

## Executive Summary

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

#### 1. Introduction

This document is the 2025-2029 Consolidated Plan for the City of Saint Paul, Minnesota, to be submitted to the U.S. Department of Housing and Urban Development (HUD). 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 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 one-year Annual Action Plan (AAP) for 2025 program year is also included in this document. The AAP includes the City's application for 2025 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.

The City expects to receive funding allocations in 2025 similar to its 2024 allocations: \$6,765,326 in CDBG funding, \$1,534,711 in HOME funding, and \$591,281 in ESG funding. In addition, the City estimates using about \$235,000 in CDBG program income and approximately \$206,000 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 2025 are not yet passed upon drafting this 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 will be adjusted in direct proportion to the difference in actual allocations, and estimated Program Income may adjust. This document will be submitted to HUD by April 15, 2025, which is forty-five days before the City's June 1, 2025, program year begins. However, if the 2025 budget is delayed, that submission will be delayed until known allocations are provided by HUD.

## **2. Objectives & outcomes identified in the Plan Needs Assessment Overview**

Through the needs assessment and market analysis, citizen participation process, and agency consultation during the development of this 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**

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. Since the COVID-19 pandemic, economic and social impacts have been felt in myriad ways by residents of Saint Paul, but the effects have been especially hard on marginalized and less stable residents. The need for affordable housing and related services has not lessened in recent years, making these HUD dollars even more important.

During the 2023-2024 program year, the City and its partners provided housing assistance to 101 households through CDBG-funded activities. For these households: 46 were white, 15 were Black/African American, 31 were Asian, and 11 identified as a mixed-race household, 11 households identified as Hispanic, and 30 were female-headed households. 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 sub-grantees, whose programs were available to income-eligible residents residing in the sub-grantee's service areas: Districts 1 through 8, 11, and 17.

During the 2023-2024 program year, the City's ESG program funded eligible activities for 1,545 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**

Throughout the development of the Consolidated Plan, interested individuals, local and regional organizations, and government agencies were encouraged to contribute information, ideas, opinions, and suggested priorities for improving community public facilities, increasing affordable housing, creating job and business opportunities, and enhancing public services.

Many opportunities were available to residents to provide input for the Plan, including Safe Summer Nights community outreach events on August 1 and 15, where City staff gathered input through conversations and polls, and shared information on the Consolidated Plan and opportunities for public input. Additionally, opportunities for public input were available at two public meetings dedicated to collecting input on the Consolidated Plan, presentations and discussions at District Council meetings, consultation with the City's CIB Committee, and an online engagement survey for both local organizations and residents.

The City consulted with a diverse array of public, non-profit and private sector organizations via phone, email, online survey, and face-to-face interviews. The following groups were invited to participate in the process:

- City of Saint Paul Departments

## DRAFT

- City of Saint Paul Capital Improvement Budget (CIB) Committee
- Saint Paul District Councils
- Saint Paul Business Associations and Chambers of Commerce
- Saint Paul Community Development Corporations
- Saint Paul Public Housing Agency
- Ramsey County Community and Economic Development
- Ramsey County Continuum of Care
- Saint Paul-Ramsey County Public Health
- Capitol Region Watershed District
- Local and regional social service organizations

These groups represent a range of interests including:

- Saint Paul residents (including cultural communities)
- Affordable housing providers
- Economic development organizations
- Local government offices
- Fair housing service providers
- Victim services
- Homeless shelters and providers
- Providers for elimination of lead-based paint hazards
- Health and human service providers, including those focusing on elderly, veterans, homelessness, and persons with disabilities and mental illness
- Organizations working to narrow the digital divide and increase internet access
- Management of flood prone areas, public land, or water resources

The public comment period for this document is March 10 through April 9, 2025. Notification of the availability of the draft document was sent out through the City's Early Notification System (ENS) and a public notice was published in the *Pioneer Press*. The notice included information for persons needing special accommodations and assistance for non-English speaking residents. The document is made available for review at the Department of Planning and Economic Development, on its website, and at the Saint Paul Public Library Bookmobile. Saint Paul public libraries do not require a library card to access public library computers. The City held a public hearing on March 27<sup>th</sup> at the Sun Ray Public Library. No comments were received during the public comment period [or *Public comments received are included in Attachment F*].

## 5. Summary of public comments



A summary of the comments received during the CIB public hearing held on August 12, 2024, at Rondo Community Library is included in Attachment A.

The public comment period for this 2025-2029 Consolidated Plan was March 10 through April 9, 2025, and a public hearing was held on March 27<sup>th</sup> at the Sun Ray Public Library. No comments were received at the public hearing or during the public comment period [*or Public comments received are included in Attachment F*].

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

The public comment period for this document was March 10 through April 9, 2020. No comments were received [*or Public comments received at this meeting are included in Attachment F*].

## **7. Summary**

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 non-profit community housing providers, and non-housing service agencies.

Developing the Consolidated Plan included gathering input and data from residents, local and regional organizations, and government agencies through a citizen participation and agency consultation process. Opportunities available to residents included voting activities at City-sponsored events, engagement and commenting at public meetings, discussions at District Council meetings, and an online survey available in 5 languages with paper copies available at all local libraries. In addition, the City consulted with a diverse array of public, non-profit, and private sector organizations via phone, email, online survey, and face-to-face interviews.

Through the Plan's needs assessment, market analysis, and citizen participation and consultation process, the City identified priority needs as well as strategies to address those needs. The resulting Consolidated Plan and subsequent Annual Action Plan provide a unified vision of services, activities, and initiatives designed to improve the quality of life for Saint Paul residents by providing affordable housing construction and rehabilitation, public services, revitalized neighborhoods, support for homeless and special needs populations, elimination of blight, and the expansion of economic development opportunities for communities and businesses.

## The Process

### PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

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

The following are the agencies/entities 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	City of ST. Paul	Planning and Economic Development
HOME Administrator	City of ST. Paul	Planning and Economic Development
ESG Administrator	City of ST. Paul	Planning and Economic Development

**Table 1 – Responsible Agencies**

### Narrative

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 81 full-time employees that work on our four department teams – Administration & Finance, Economic Development, Housing, and Planning (which includes Heritage Preservation and Zoning). The 2025 adopted PED operations admin. budget is \$15.4 million and the 2025 adopted total HRA budget is \$49.6 million.

PED finances affordable housing development, offers home rehabilitation lending and mortgage foreclosure prevention programs to residents, emergency shelter grant programs, 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.

**Consolidated 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)
- Nellie Jerome, Consolidated Plan Project Lead – 651-266-6648 or [Nellie.Jerome@ci.stpaul.mn.us](mailto:Nellie.Jerome@ci.stpaul.mn.us)

Written comments should be sent to the following address:

City of Saint Paul, Planning and Economic Development  
Attn: Nellie Jerome  
City Hall Annex, Suite 1400  
25 West 4th street  
Saint Paul, MN 55102

## **PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.215(I) and 91.315(I)**

### **1. Introduction**

The City of Saint Paul consulted with numerous organizations, local government agencies, and City departments throughout the Consolidated Plan process. 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.

The City's Housing staff consults with the Saint Paul Public Housing Agency (PHA), 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 August 12, 2024, at the Rondo Community Library. The CIB committee heard public testimony regarding preliminary recommendations for funding of Community Proposals for 2024 and for 2025 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, 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 with Ramsey County, through August 2026, 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.

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 Needs, the CoC's current strategic priorities, quarterly ESG Provider Meetings, and CoC leadership. Due to an influx of rental assistance monies, the CoC is coordinating with the Performance and Ranking committee to re-examine the FY 2024-25 ESG priorities.

Ramsey County, with technical guidance from a U.S. Department of Housing and Urban Development (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 Joint Powers Agreement 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 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 and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS**

The City continues its current Joint Powers Agreement with Ramsey County, through August 2026, 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 Heading Home Ramsey Needs, 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, with technical guidance from a U.S. Department of Housing and Urban Development (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 and City and its funded subrecipients adhere to HUD ESG requirements. 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, with 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.

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

1	Agency/Group/Organization	Ramsey County Social Services
	<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>	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	City ESG staff consult with the Ramsey County Continuum of Care (CoC) Governing Board and/or Steering Committee, as well as the Ramsey County Emergency Solutions Grant Coordinator and the Heading Home Ramsey (HHR) Performance and Ranking Committee to attend required meetings that assist homeless individuals as well as those at-risk of being homeless. ESG staff and the Performance Ranking Committee recommend funding allocations for ESG services. Other outcomes include the development of ESG and CoC program evaluations, additional service provider staff training, and increased service coordination.

<b>2</b>	<b>Agency/Group/Organization</b>	<b>Saint Paul-Ramsey County Public Health</b>
	<b>Agency/Group/Organization Type</b>	Services-Health Health Agency Other government - County
	<b>What section of the Plan was addressed by Consultation?</b>	Lead-based Paint Strategy Homelessness Strategy Homeless Needs - Families with children
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This agency was consulted through phone conversations and evaluation of department plans. Outcomes of consultation include a better understanding of the County programs and priorities for addressing lead-based paint hazards and the need for better coordination with the City’s Department of Safety and Inspections enforcement staff to keep families safe from lead hazards. Department plans demonstrate an increased need for health and social services, affordable housing and transportation, and educational services and activities that include the elderly, as the number of people 65+ will double by 2040. The most recent Community Health Improvement Plan emphasized racial equity, healthy food, active living, access to health care, mental health, violence prevention, homelessness and housing instability, climate change and opioid crisis and response as community priorities.
<b>3</b>	<b>Agency/Group/Organization</b>	<b>YMCA of the North - Youth and Family Services - Prevention Program</b>
	<b>Agency/Group/Organization Type</b>	Services-Children Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless needs assessment
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This agency was consulted through email and an online survey. The agency’s Youth and Family Services provides housing resources and supportive services throughout Ramsey County and operates a Homeless Prevention program that targets youth 18-24yrs who are at imminent risk of homelessness.
<b>4</b>	<b>Agency/Group/Organization</b>	<b>Neighborhood Development Alliance, Inc (NeDA)</b>
	<b>Agency/Group/Organization Type</b>	Services - Housing



	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Housing Community Development Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The organization was consulted through email and through an online survey. The Neighborhood Development Alliance (NeDA) builds affordable housing and empowers communities to create sustainability through financial education and guidance. Consulting and coordinating with this organization will improve the coordination of housing and financial resources for resident and businesses.
<b>5</b>	<b>Agency/Group/Organization</b>	<b>Charles Thompson Memorial Hall</b>
	<b>Agency/Group/Organization Type</b>	Services-Persons with Disabilities Services-Children Services-Elderly Persons
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The organization was consulted through email and through an online survey. Nonprofit Charity serving Deaf, hard of hearing, and DeafBlind in Minnesota. Consultation and coordination will improve future services, like infrastructure and ASL access, for residents who have disabilities related to deafness.
<b>6</b>	<b>Agency/Group/Organization</b>	<b>Keystone Community Services</b>
	<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 Services - Narrowing the Digital Divide
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs Assessment Non-Housing Community Development

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The organization was consulted through email and through an online survey. Keystone Community Services provides basic needs, youth, senior and case management services. Coordination with this organization will help improve insight into current community housing and non-housing needs.
<b>7</b>	<b>Agency/Group/Organization</b>	<b>Saint Paul Public Housing Agency</b>
	<b>Agency/Group/Organization Type</b>	Housing PHA
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	City and PHA representatives participate on an on-going basis with the CoC and Family Homelessness Prevention Assistance Program Committee and other housing initiatives. The City and PHA have a working partnership which recognizes the challenges faced by the PHA administration and PHA residents. The PHA was consulted over the phone and by email regarding this plan. Outcomes include an understanding of the PHA's conversion of public housing via HUD's 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.
<b>8</b>	<b>Agency/Group/Organization</b>	<b>City of Saint Paul Committees</b>
	<b>Agency/Group/Organization Type</b>	Other government - Local Services-Elderly Persons Business and Civic Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Market Analysis Non-Homeless Special Needs Economic Development

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City of Saint Paul has several community committees that provide policy guidance to the City. Staff to these committees share the online survey, which asked respondents to rate community needs based on the level of importance and the results were used to establish the priority community needs. City staff also offered to attend a regularly scheduled committee meeting to discuss the Consolidated Plan and needs and priorities and presented to the Business Review Council and Advisory Committee on Aging. The outcome was a greater understanding of community needs, especially related to the application process to receive funds as a subrecipient.
9	<b>Agency/Group/Organization</b>	<b>Independent School District #625 (Saint Paul Public Schools)</b>
	<b>Agency/Group/Organization Type</b>	Services-Education
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	City staff and the 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 Saint Paul Public Schools on efforts related to data collection on children experiencing homelessness.
10	<b>Agency/Group/Organization</b>	<b>State of Minnesota Department of Employment and Economic Development Office of Broadband Development</b>
	<b>Agency/Group/Organization Type</b>	Services - Narrowing the Digital Divide Other government - State
	<b>What section of the Plan was addressed by Consultation?</b>	Broadband Needs of Housing occupied by Low- and Moderate-Income Households
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Office of Broadband Development was consulted through email. The outcomes include a better understanding of the broadband service connectivity in Saint Paul and the barriers to broadband connectivity.
11	<b>Agency/Group/Organization</b>	<b>Comcast</b>
	<b>Agency/Group/Organization Type</b>	Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide

	<b>What section of the Plan was addressed by Consultation?</b>	Broadband Needs of Housing occupied by Low- and Moderate-Income Households
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The organization was consulted through a virtual meeting conversation. The outcomes include a better understanding of the work Comcast is doing to make broadband connectivity more accessible, which includes the Internet Essentials program. To assist users with internet usage, Comcast Internet Essentials includes access to free, online training materials related to digital skills and internet safety. Their Internet Essentials Partnership Program (IEPP) also helps sponsoring agencies cover the cost of internet service for their clients. Comcast’s commitment to digital inclusion also includes Lift Zones, designated community partners where high-speed internet access is available for free.
<b>12</b>	<b>Agency/Group/Organization</b>	<b>Capitol Region Watershed District</b>
	<b>Agency/Group/Organization Type</b>	Agency - Managing Flood Prone Areas Agency - Management of Public Land or Water Resources
	<b>What section of the Plan was addressed by Consultation?</b>	Hazard Mitigation
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The organization was consulted through email regarding the 2021-2030 Watershed Management Plan. In this plan, the District delineated additional flood areas for the 10-, 50-, 100- and 500-year storms in the Trout Brook and Como Lake watersheds and ranked priority floor areas. The District is actively working with the City on how to best coordinate floor mitigation efforts.
<b>13</b>	<b>Agency/Group/Organization</b>	<b>City of Saint Paul Department of Emergency Management</b>
	<b>Agency/Group/Organization Type</b>	Agency - Emergency Management
	<b>What section of the Plan was addressed by Consultation?</b>	Hazard Mitigation
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Project staff consulted Emergency Management staff on the City’s All-Hazard Mitigation Plan. It was learned that Emergency Management staff is currently working on integrating the plan into Ramsey County’s Multi-Hazard Mitigation Plan as part of a joint effort.

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

**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. Starting in FY2020, 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.
Thrive MSP 2040	Metropolitan Council	The City’s strategic priorities for anti-poverty measures, fair housing, equal economic opportunity, business development, economic development, and job creation are in line with the strategies identified in the Metropolitan Councils Thrive MSP 2040 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.

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

**Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(I))**

The City of Saint Paul is one of 19 municipalities located within Ramsey County and represents approximately 40% of the county's land area. Ramsey County is the lead human service agency in these jurisdictions. Both Saint Paul and Ramsey County participate in the Community Development Block Grant (CDBG) program, and consistently keep each other informed in all areas of the program, including non-housing community development needs. This includes ongoing communication and dialogue, and collaborations in the delivery of healthcare, senior services, and employment programs. The City has a close collaboration with Ramsey County, holding monthly meetings to discuss projects of common interests and collaborating in various County's housing solicitations.

Ramsey County is required to prepare its own five-year Consolidated Plan. For consistency, Ramsey County reviews Saint Paul's Consolidated Plan and Saint Paul reviews Ramsey County's Consolidated Plan.

The Saint Paul Public Housing Agency (PHA) is the principal direct provider of housing assistance to the City's low- and moderate-income residents. In Saint Paul, the PHA is a separate legal entity, and not a part of City government. The City works closely with the PHA to develop housing goals, strategies, and program implementation. This close relationship is based on mutual goals, staff cooperation, joint planning, and program development.

The City works closely and cooperatively with the Minnesota Housing Finance Agency (Minnesota Housing) through programs that fund all types of housing needs. Minnesota Housing offers various funding opportunities through an annual competitive application process. These opportunities include housing tax credits (HTCs) as well as deferred and amortized funding sources. During this application process, City and Minnesota Housing staff have routine meetings and on-going conversations to discuss project rankings and work together to determine funding priorities to match limited funding resources with projects that meet the highest local affordable rental housing needs. In addition, City and Minnesota Housing staff meet monthly as part of the Intergovernmental Stabilization Group (ISG) that includes other funding partners such as HUD, Ramsey County, Family Housing Fund, and Local Initiatives Support Corporation (LISC) to collaborate on preserving existing affordable rental housing. For single-family home ownership needs, the City applies and receives funding from Minnesota Housing through their homeowner rehabilitation loan programs. For acquisition, rehabilitation, and new construction of single-family properties, Minnesota Housing provides the City funding through their competitive application process for Community Housing Impact Funds (CHIF).

Through applications to pass-through grants, the City actively participates in the activities of the Metropolitan Council, the state authorized policy-making body, planning agency, and provider of essential services, including transportation and infrastructure, for the Twin Cities metropolitan region. In addition, the City also collaborates with the Metropolitan Council to project and track affordable housing units developed in Saint Paul.

Finally, the City of Saint Paul works closely with the City of Minneapolis. The Minneapolis Saint Paul Housing Finance Board that includes both the Saint Paul HRA and the Minneapolis City Council is a sub allocator of low-income housing tax credits.

**Narrative (optional):**

## **PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(c)**

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

The priority needs for the 2025-2030 Consolidated Plan were identified through the needs assessment and market analysis and using input from the consultation and citizen participation process.

During August 2024, City staff attended City-sponsored Safe Summer Nights events held in different locations throughout the city. At these events, staff provided flyers and informational boards about the Consolidated Plan and the opportunity for attendees to participate in a goal voting activity. As a result, hundreds of residents of all ages were informed about the Plan and approximately

During November and December 2024, City staff attended several District Council Board of Directors and Committee meetings. The District Councils are independent, non-profit, resident organizations that engage and represent the people living in each district. District Council Boards of Directors and Committees are made up of volunteers elected by the neighborhood residents. At these meetings, staff provided information about the Consolidated Plan, answered questions, and led discussions on the community needs in each district.

In addition, the Consolidated Plan online survey was open from November 15, 2024, to January 15, 2025, and was available in English, Somali, Hmong, Karen, and Spanish languages. There were two ways to take the survey: (1) as a Saint Paul resident (2) as a staff member of a community organization serving Saint Paul residents. Both surveys were available online and paper versions were available at local libraries. Multiple posts were made on the City's social media platforms, and emails were sent out to District Councils and to government agencies, area chambers of commerce and business associations, community development corporations, and other community social service groups. Organizations were also encouraged to share the resident survey with the communities with whom they work with. The survey asked respondents to rate community needs based on the level of importance. There were four different categories of needs: (1) housing, (2) economic development, (3) public facilities and infrastructure, and (4) public services. Approximately 351 people completed at least one category of the resident survey and 27 staff members from organizations completed at least one category of the organization survey.



DRAFT

The public comment period for this document was March 10 through April 9, 2025. Notification of the availability of the draft document was sent out through the City's Early Notification System (ENS) and a public notice was 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 at the Department of Planning and Economic Development, on its website, and at the Saint Paul Public Library Bookmobile.

A summary of the comments received during the public hearing held on August 12, 2025, as part of the CIB funding cycle is included in Attachment A. An additional public hearing for comment on this document was held March 27, 2025, at Sun Ray Public Library. There were no comments received during the public comment period [or *Public comments received at this meeting are included in Attachment F*].

DRAFT

## Citizen Participation Outreach

DRAFT

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons
1	Public Hearing	Non-targeted/ broad community	On August 12, 2024, at the Rondo Community Library, the Capital Improvement Budget (CIB) Committee held a Public Hearing to solicit comments regarding funding selection and priorities for CDBG allocations. Four people spoke.	Comments at the Public Hearing focused traffic calming and frustration over the CIB process. A summary of the comments is included in Attachment A.	All comments were considered.

DRAFT

2	Public Meeting	Non-targeted/ broad community	Over two Safe Summer Nights events at two different parks, a total of approximately 300 people were informed about the Consolidated Plan and 238 participated in a voting activity.	<p>Participants selected their top three out of seven needs that they felt were the most important priorities for the City. The results of the voting activity in terms of percentage of votes are as follows:</p> <ul style="list-style-type: none"> <li>• emergency shelter - homeless 25%</li> <li>• mental health services 30%</li> <li>• affordable housing 23%</li> <li>• rec and sports facilities 4%</li> <li>• financial assistance for businesses 5%</li> <li>• housing rehab assistance 7%</li> <li>• renter and landlord education 4%</li> </ul>	
3	Internet Outreach	Non-targeted/ broad community	An online survey was open from November to January and received 378 total responses.	Respondents were asked to rate the level of importance of community needs on a scale of 1 (not important at all) to 5 (extremely important).	

DRAFT

4	Internet Outreach	Government agencies, local and regional nonprofit organizations	An online survey was open from November to January and received 378 total responses. The survey was sent out to 44 local community and government organizations.	Representing their organizations, respondents were asked to rate the level of importance of community needs on a scale of 1 (not important at all) to 5 (extremely important).	
5	Public Meeting	Non-targeted/ broad community	Offer to attend Board of Directors or Committee meetings at every District Council. Two District Councils were interested in meeting with staff. Each meeting had approximately 15-20 board/committee members and additional neighborhood residents in attendance.	Discussions focused on project ideas for future funding, questions about current housing being built, and how the City planned to engage the community further.	
6	Newspaper Notice	Non-targeted/ broad community	A Public Hearing notice was published in the Pioneer Press ahead of the public comment period, noticing the public about the Plan and about how and when to view the plan and submit comments.	No comments were received [ <i>or Public comments received at this meeting are included in Attachment F</i> ].	

DRAFT

7	Internet Outreach	Non-targeted/ broad community	A public hearing notice was sent to the Early Notification System email list (approximately 3,000 people) ahead of the public comment period, noticing the public about the Plan and about how and when to view the plan and submit comments.	No comments were received [or <i>Public comments received at this meeting are included in Attachment F</i> ].	
8	Public Hearing	Non-targeted/ broad community	A public hearing for the Plan was held on March 27, 2025, at Sun Ray Public Library.	No comments were received. [or <i>Public comments received at this meeting are included in Attachment F</i> ].	

**Table 4 – Citizen Participation Outreach**

## Needs Assessment

### NA-05 Overview

#### Needs Assessment Overview

The Needs Assessment examines several key areas critical to creating a livable community for all residents of Saint Paul. Most of the housing data presented is from the HUD Comprehensive Housing Affordability Strategy (CHAS). Other non-housing data is provided by HUD and supplemented with local data.

The section specifically undertakes the following:

- Completes an overall housing needs assessment
- Identifies disproportionate need among the city's racial and ethnic groups in relationship to housing problems and cost burden
- Examines public housing
- Undertakes a homeless needs assessment
- Carries out a non-homeless special needs assessment
- Identifies non-housing community development needs

**NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)**

**Summary of Housing Needs**

<b>Demographics</b>	<b>Base Year: 2009</b>	<b>Most Recent Year: 2020</b>	<b>% Change</b>
Population	295,045	305,875	4%
Households	112,990	114,740	2%
Median Income	\$48,757.00	\$59,717.00	22%
Median Income adjusted for inflation to 2009*	\$48,757.00	\$48,876.00	0.2%

**Table 5 - Housing Needs Assessment Demographics**

**Data Source:** 2000 Census (Base Year), 2016-2020 ACS (Most Recent Year). \*US Bureau of Labor Statistics inflation calculator

**Number of Households Table**

(HAMFI is HUD Area Median Family Income)

	<b>0-30% HAMFI</b>	<b>&gt;30-50% HAMFI</b>	<b>&gt;50-80% HAMFI</b>	<b>&gt;80-100% HAMFI</b>	<b>&gt;100% HAMFI</b>
Total Households	24,170	17,855	24,385	12,440	35,890
Small Family Households	6,220	4,925	7,045	3,940	17,570
Large Family Households	2,815	2,640	2,440	1,245	2,685
Household contains at least one person 62-74 years of age	4,750	3,330	4,990	2,525	6,400
Household contains at least one person age 75 or older	2,635	1,450	2,055	845	1,800
Households with one or more children 6 years old or younger	4,585	4,015	3,520	1,745	3,830

**Table 6 - Total Households Table**

**Data Source:** 2016-2020 CHAS



**Housing Needs Summary Tables**

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>										
Substandard Housing - Lacking complete plumbing or kitchen facilities	400	135	175	35	745	50	35	10	10	105
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	940	415	375	200	1,930	110	110	120	155	495
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	1,240	845	490	25	2,600	170	380	355	225	1,130
Housing cost burden greater than 50% of income (and none of the above problems)	9,855	1,655	100	0	11,610	2,460	925	345	40	3,770
Housing cost burden greater than 30% of income (and none of the above problems)	3,185	5,240	2,010	290	10,725	865	1,955	2,555	675	6,050

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Zero/negative Income (and none of the above problems)	865	0	0	0	865	145	0	0	0	145

**Table 7 – Housing Problems Table**

Data Source: 2016-2020 CHAS

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>										
Having 1 or more of four housing problems	12,435	3,050	1,145	255	16,885	2,795	1,450	835	430	5,510
Having none of four housing problems	7,235	8,685	10,505	4,760	31,185	1,705	4,670	11,905	6,995	25,275
Household has negative income, but none of the other housing problems	0	0	0	0	0	0	0	0	0	0

**Table 8 – Housing Problems 2**

Data Source: 2016-2020 CHAS

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	4,290	1,985	540	6,815	600	980	900	2,480
Large Related	1,795	1,025	30	2,850	345	370	200	915
Elderly	3,310	1,155	530	4,995	1,710	930	934	3,574
Other	5,600	3,535	1,050	10,185	900	730	865	2,495
Total need by income	14,995	7,700	2,150	24,845	3,555	3,010	2,899	9,464

Table 9 – Cost Burden > 30%

Data Source: 2016-2020 CHAS

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	0	0	435	435	425	265	0	690
Large Related	0	0	90	90	305	35	0	340
Elderly	2,080	395	50	2,525	1,160	325	74	1,559
Other	0	4,640	770	5,410	790	0	0	790
Total need by income	2,080	5,035	1,345	8,460	2,680	625	74	3,379

Table 10 – Cost Burden > 50%

Data Source: 2016-2020 CHAS

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	2,035	1,165	530	220	3,950	265	430	340	245	1,280

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Multiple, unrelated family households	100	80	165	0	345	15	95	129	140	379
Other, non-family households	65	30	180	35	310	0	0	4	0	4
Total need by income	2,200	1,275	875	255	4,605	280	525	473	385	1,663

**Table 11 – Crowding Information – 1/2**

Data Source: 2016-2020 CHAS

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	<i>Data not available</i>							

**Table 12 – Crowding Information – 2/2**

**Describe the number and type of single person households in need of housing assistance.**

According to the 2023 ACS 5-Year Estimates, there are 45,613 single-person households in Saint Paul with approximately 13,630 single-person households age 65 or older. Elderly nonfamily households, which includes single households, are approximately 12 times more likely to be below the poverty level than elderly family households. Many elderly single-person households may be on fixed incomes and require housing assistance. The number of “other” renter households earning up to 50% AMI represent the most cost-burdened household type (in number) across owners and renters with 9,135 cost-burdened “other” renter households and 4,640 severely cost-burdened “other” households. These very low income “other” households earning up to 50% AMI, which includes single-person households, need housing assistance.

**Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.**

The City of Saint Paul does not collect the number of disabled persons or victims of domestic violence, dating violence, sexual assault, and/or stalking. However, the City contracts with the Saint Paul &

Ramsey County Domestic Abuse Intervention Project, an organization serving women who have experienced domestic violence in their household, which reports the number of housing-related services they provide to their clients. Annually, this organization refers approximately 1,248-1,560 domestic violence victims for emergency sheltering with one of the three organizations in the city that provide that service. These providers include Women’s Advocates with the capacity to house 25 women and approximately 35 children, Casa de Esperanza that can house up to 11 total people in six rooms, and Women of Nations Eagle’s Nest can house up to 44 women and children. In addition to referring women to emergency shelters, Saint Paul & Ramsey County Domestic Abuse Intervention Project also provides housing advocacy to approximately 3,400 clients annually. This includes helping to locate financial assistance for housing and/or moving, housing resources, help with breaking leases for safety reasons, advocacy with landlords, lock changes, assistance in filing protection orders to be safe at home so they don’t have to relocate, and connecting to legal assistance when needed for tenants’ rights issues. Breaking Free (an ESG subrecipient of Ramsey County) has been supporting victims of sex trafficking in Minnesota for over 25 years. Its mission is empowering survivors of sex trafficking and prostitution to build new lives through safe housing, direct services, healing programs, survivor advocacy, worldwide policy change and hope. The organization primarily serves, though not exclusively, Black females in the age range of 18-60 years old who have experienced sexual exploitation.

### **What are the most common housing problems?**

According to the 2016-2020 CHAS data, 40% of households earning up to 100% of AMI have at least one or more housing problems. HUD defines housing problems as: 1) lacks complete kitchen facilities; 2) lacks complete plumbing facilities; 3) More than one person per room; 4) Cost burden over 30%.

Cost burden is the most reported housing problem in Saint Paul across all tenure types and household income levels. According to 2017-2021 ACS data, 45% percent of renter households are identified as being cost burdened (with housing costs greater than 30% of income) and 23% severely cost burdened (with housing costs greater than 50% of income). For homeownership households, 19% of households are cost burdened and 7% are severely cost burdened.

Sixty percent of the renter households up to 80% of AMI that are cost burdened earn a household income of 30% of the AMI or less. Sixty percent of the renter households that are severely cost burdened earn between 30%-50% of AMI or less. Ownership households experience cost burden at an overall similar rate to rental with slightly different trends at income levels. While 69% of ownership households up to 80% of AMI that are cost burdened earn a household income of 0%-50% of AMI, 79% of ownership households that are severely cost burdened earn a household income of 30% of AMI or less.

Crowding is the second most reported housing problem. Among the households earning up to 100% of AMI with a housing problem, 16% of renter households and 14% of ownership households were

considered either overcrowded (with 1.01 to 1.5 people per room) or severely overcrowded (with more than 1.51 people per room). Sixty-eight percent of households that are considered overcrowded or severely overcrowded earn up to 50% AMI. Forty-eight percent of the renter households that are overcrowded or severely overcrowded earn up to 30% of AMI, while 37% of the ownership households that are overcrowded or severely overcrowded earn 30%-80% of AMI.

**Are any populations/household types more affected than others by these problems?**

Extremely low- and low-income renters are particularly impacted by cost burden and overcrowding. Sixty-two percent of renter households at extremely low incomes (earning 30% AMI or less) are cost burdened and 9% are severely cost burdened. Forty-three percent of renter households at low incomes (earning 30-50% AMI) are cost burdened and 28% are severely cost burdened.

Those households experiencing the highest rate of cost burden are small, related, renter households and “other” renter households earning 0% to 30% of AMI. Of the rental households earning up to 100% AMI experiencing overcrowding, 75% earn 50% AMI or less. This is a much higher rate than the proportion of overcrowded ownership households earning 50% AMI or less, which is 48%.

**Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance.**

Household characteristics of low-income individuals or families with children that lead to instability include poverty; mental, physical and developmental disabilities; and incidents of domestic violence. Renters facing severe housing cost burden exhibit characteristics linked with housing instability in that when people are unable to pay their rent because of severe cost burden or job disruption, they are at a greater risk for imminent homelessness. Rental rates have increased faster than wages, and competition for lower cost units is high in Saint Paul, which puts low-income households at risk for future homelessness.

The needs of formerly homeless families and individuals receiving rapid re-housing assistance, whose assistance is or will be terminated, continue to need connections to mainstream services as well as continued, but less frequent, monitoring by the case manager that has been working with them.

**If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:**

Not applicable.

**Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness.**

Particular housing characteristics that have been linked with instability and increased risk of homelessness include:

- Insufficient supply of decent housing affordable to those at the extremely and very low income levels;
- Inadequate supply of Section 8 vouchers and other mainstream subsidized housing vouchers; and
- Insufficient number of permanent supportive housing units.

## **Discussion**

Highlights of the information and analysis provided through this needs assessment include:

- While there are almost the same number of rental households as there are ownership households, rental households are almost two times more likely to experience cost burden and more than three times more likely to experience severe cost burden than ownership households.
- Low- and medium-income small family households make up over a third of all households, while large family households with low- and medium-income make up only 8% of all households.
- Extremely low income (<30% AMI) renters and owners make up roughly half of respondents who experience substandard housing problems.
- Elderly nonfamily households, which includes single households, are approximately 12 times more likely to be below the poverty level than elderly family households.
- Over 72% of SPIP clients, who are victims of domestic violence and their children, are Indigenous, people of color, or refugees/immigrants and the majority have dependent children. An estimated 80% of participants were from Saint Paul and 10% were

homeless and over 80% were assisted in sustaining their housing. The majority were at or below the poverty level.

- 16% of renter households and 14% of ownership households were considered either overcrowded (with 1.01 to 1.5 people per room) or severely overcrowded (with more than 1.51 people per room).
- Forty-eight percent of the renter households that are overcrowded or severely overcrowded earn up to 30% of AMI
- Extremely low- and low-income renters are particularly impacted by cost burden and overcrowding. Sixty-two percent of renter households at extremely low incomes (earning 30% AMI or less) are cost burdened and 9% are severely cost burdened.
- Renters facing severe housing cost burden exhibit characteristics linked with housing instability in that when people are unable to pay their rent because of severe cost burden or job disruption, they are at a greater risk for imminent homelessness. Rental rates have increased faster than wages, and competition for lower cost units is high in Saint Paul, which puts low-income households at risk for future homelessness.



**NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)**

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

**Introduction**

HUD requires communities to identify disproportionately greater need in terms of members of a racial or ethnic group experiencing severe housing problems at a greater rate than the income level as a whole. For the purposes of HUD, a disproportionately greater need exists when the percentage of households (of a particular racial or ethnic group) that experience one or more housing problems is at least 10 percentage points higher than the percentage of households (of the income level as a whole) that experience one or more housing problems. The different income levels include 0-30% of AMI, 30-50% of AMI, 50-80% of AMI, and 80-100% of AMI. HUD defines housing problems as: 1) lacks complete kitchen facilities; 2) lacks complete plumbing facilities; 3) More than one person per room; 4) Cost burden over 30%.

The HUD-defined analysis of disproportionate housing needs shows that there is close to a disproportionate number of Asian households earning 30-50% of AMI and 80-100% of AMI that are experiencing housing problems. The City recognizes that communities of color in Saint Paul statistically have higher unemployment rates and lower incomes and be disproportionately impacted by barriers to housing access including restrictive tenant screening criteria and discrimination. The City has a strong focus on addressing racial disparities, and has funds allocated to programs intended to close these gaps and to ensure that we are Affirmatively Furthering Fair Housing.

**0%-30% of Area Median Income**

<b>Housing Problems</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	19,710	4,330	955
White	8,550	1,805	525
Black / African American	5,405	1,545	194
Asian	3,110	550	125
American Indian, Alaska Native	240	65	10
Pacific Islander	0	0	0
Hispanic	1,640	210	80

**Table 13 - Disproportionally Greater Need 0 - 30% AMI**

Data Source: 2016-2020 CHAS

\*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

**30%-50% of Area Median Income**

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	12,100	5,465	0
White	6,275	3,165	0
Black / African American	2,245	1,070	0
Asian	2,005	575	0
American Indian, Alaska Native	105	50	0
Pacific Islander	0	0	0
Hispanic	1,070	465	0

**Table 14 - Disproportionally Greater Need 30 - 50% AMI**

Data Source: 2016-2020 CHAS

\*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

**50%-80% of Area Median Income**

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	6,310	12,970	0
White	3,875	8,025	0
Black / African American	925	1,890	0
Asian	805	1,585	0
American Indian, Alaska Native	35	70	0
Pacific Islander	4	20	0
Hispanic	625	920	0

**Table 15 - Disproportionally Greater Need 50 - 80% AMI**

Data Source: 2016-2020 CHAS

\*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

**80%-100% of Area Median Income**

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,770	10,235	0
White	1,180	7,555	0
Black / African American	120	955	0
Asian	265	845	0
American Indian, Alaska Native	0	20	0
Pacific Islander	0	20	0
Hispanic	170	590	0

**Table 16 - Disproportionally Greater Need 80 - 100% AMI**

Data Source: 2016-2020 CHAS

\*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

**Discussion**

Comparing the percentage of households with one of the four housing needs by race with the percentage of the total population by race provides another lens by which to look at disproportionate need. Twenty-seven percent of households at extremely low incomes (0-30% of AMI) with one or more of the four housing problems are African American households, while African Americans represent only 18% of the city’s population. White households follow a similar pattern for low and moderate-income households. While this group represents 51% of the City’s population, 61% of low-income households (50-80% of AMI) and 67% of moderate-income households (80-100% of AMI) experiencing one or more housing problems are white households. However, white households make up 62% of low-income households and 73% of moderate-income households, which leads to an overrepresentation of white households with a housing problem at those income levels.

**NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)**

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

**Introduction**

HUD requires communities to identify disproportionately greater need in terms of members of a racial or ethnic group experiencing severe housing problems at a greater rate than the income level as a whole. For the purposes of HUD, a disproportionately greater need exists when the percentage of households (of a particular racial or ethnic group) that experience one or more housing problems is at least 10 percentage points higher than the percentage of households (of the income level as a whole) that experience one or more housing problems. The different income levels include 0-30% of AMI, 30-50% of AMI, 50-80% of AMI, and 80-100% of AMI. HUD defines severe housing problems as: 1) lacks complete kitchen facilities; 2) lacks complete plumbing facilities; 3) More than 1.5 persons per room; 4) Cost burden over 50%. The "severe housing problems" category differs from the "housing problems" category by households being more overcrowded and experiencing a greater cost burden.

The HUD-defined analysis of disproportionate housing needs shows that there is a disproportionate number of Asian and Hispanic households experiencing severe housing problems. The City recognizes that communities of color in Saint Paul statistically have higher unemployment rates and lower incomes and be disproportionately impacted by barriers to housing access including restrictive tenant screening criteria and discrimination. The City has a strong focus on racial equity and addressing disparities, and has funds allocated to programs intended to close these gaps and to ensure that we are Affirmatively Furthering Fair Housing.

**0%-30% of Area Median Income**

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	15,565	8,475	955
White	6,740	3,615	525
Black / African American	4,120	2,835	194
Asian	2,600	1,060	125
American Indian, Alaska Native	200	100	10
Pacific Islander	0	0	0

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Hispanic	1,255	595	80

**Table 17 – Severe Housing Problems 0 - 30% AMI**

Data 2016-2020 CHAS  
Source:

\*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

**30%-50% of Area Median Income**

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	5,135	12,435	0
White	2,490	6,945	0
Black / African American	920	2,395	0
Asian	1,250	1,330	0
American Indian, Alaska Native	10	140	0
Pacific Islander	0	0	0
Hispanic	325	1,215	0

**Table 18 – Severe Housing Problems 30 - 50% AMI**

Data 2016-2020 CHAS  
Source:

\*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

**50%-80% of Area Median Income**

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	1,910	17,370	0
White	790	11,115	0
Black / African American	335	2,475	0
Asian	550	1,840	0
American Indian, Alaska Native	0	100	0
Pacific Islander	0	24	0
Hispanic	235	1,305	0

**Table 19 – Severe Housing Problems 50 - 80% AMI**

Data 2016-2020 CHAS  
Source:

\*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

**80%-100% of Area Median Income**

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	455	11,550	0
White	95	8,640	0
Black / African American	55	1,020	0
Asian	220	895	0
American Indian, Alaska Native	0	20	0
Pacific Islander	0	20	0
Hispanic	90	680	0

**Table 20 – Severe Housing Problems 80 - 100% AMI**

Data 2016-2020 CHAS  
Source:

\*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

## **Discussion**

Under the HUD-defined analysis of disproportionate housing need by race, the following disproportionate needs were identified in the City of Saint Paul:

- Asian households at 30%-50%, 50%-80%, and 80%-100% of AMI
- Hispanic households at 80%-100% of AMI

Comparing the percentage of households with one of the four housing needs by race with the percentage of the total population by race provides another lens by which to look at disproportionate need and confirms the HUD-defined analysis. At low incomes (50-80% of AMI) and moderate incomes (80-100% of AMI), 29% and 48%, of households, respectively, experiencing one or more of the four severe housing problems is an Asian household, while this group represents 18% of the City's population. While Hispanics represent 10% of the city's population, Hispanic households make up 20% of the moderate-income households (80-100% of AMI) experiencing a severe housing problem.

**NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)**

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

**Introduction:**

HUD requires communities to identify disproportionately greater need in terms of households of a particular racial or ethnic group experiencing a housing cost burden at a greater rate than the jurisdiction as a whole. For the purposes of HUD, a disproportionately greater need exists when the percentage of households (of a particular racial or ethnic group) that experience housing cost burden is at least 10 percentage points higher than the percentage of households (of the jurisdiction as a whole) that experience housing cost burden. The different levels of housing cost burdens include: <=30% (households without a cost burden, the housing cost to income ratio is less than 30%), 30-50% (cost-burdened households that pay between 30% and 50% of their income on housing-related costs), and >50% (severely cost-burdened households that pay more than 50% of their income on housing-related costs).

The HUD-defined analysis of disproportionate housing cost burden shows a disproportionate severe cost burden for African American households. The City recognizes that communities of color in Saint Paul statistically have higher unemployment rates and lower incomes and be disproportionately impacted by barriers to housing access including restrictive tenant screening criteria and discrimination. The City has a strong focus on racial equity and addressing disparities and has designed funding programs intended to close these gaps to ensure we are Affirmatively Furthering Fair Housing.

**Housing Cost Burden**

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	73,805	19,510	18,170	1,010
White	52,610	11,060	9,510	550
Black / African American	8,005	3,675	4,250	194
Asian	7,150	2,250	2,285	155
American Indian, Alaska Native	410	160	185	10
Pacific Islander	40	4	0	0
Hispanic	3,820	1,840	1,250	80

**Table 21 – Greater Need: Housing Cost Burdens AMI**

Data Source: 2016-2020 CHAS



**Discussion:**

Under the HUD defined analysis of disproportionate housing cost burden need by race, the following disproportionate needs were identified in the City of Saint Paul:

- African American households experiencing a severe cost burden of greater than 50% of their income.

Comparing the percentage of households that experience housing cost burden by race with the percentage of the total population by race provides another lens by which to look at disproportionate need. The HUD-defined disproportionate severe housing cost burden for African American households was also demonstrated through this comparison to the percentage of the total population by race. African Americans represent 18% of the city's population, yet they make up 23% of the households experiencing severe cost burden. Additionally, 51% of the city's population is white, but they make up 57% of the households experiencing housing cost burden that pay between 30% and 50% of their income on housing-related costs.

## **NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)**

### **Are there any income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?**

Using the HUD-defined analysis of disproportionate housing need, there are income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category.

Close to disproportionate housing needs (lacks complete kitchen facilities; lacks complete plumbing facilities; More than one person per room; Cost burden over 30%) were identified for the following groups:

- Asian households at 30-50% of AMI and at 80-100% of AMI

Disproportionate severe housing needs (lacks complete kitchen facilities; lacks complete plumbing facilities; More than one person per room; Cost burden over 30%) were identified for the following groups:

- Asian households at 30%-50%, 50%-80%, and 80%-100% of AMI
- Hispanic households at 80%-100% of AMI
- African American households experiencing a severe cost burden

### **If they have needs not identified above, what are those needs?**

Additional disproportionate housing needs were identified by comparing the percentage of households with housing problems by race or ethnicity with the percentage of the total population by race or ethnicity. Twenty-seven percent of households at extremely low incomes (0-30% of AMI) with one or more of the four housing problems are African American households, while African Americans represent only 16% of the city's population. White households follow a similar pattern for low and moderate-income households. While this group represents 51% of the City's population, 61% of low-income households (50-80% of AMI) and 67% of moderate-income households (80-100% of AMI) experiencing one or more housing problems are white households.

At low incomes (50-80% of AMI) and moderate incomes (80-100% of AMI), 29% and 48%, of households, respectively, experiencing one or more of the four severe housing problems is an Asian household, while this group represents 18% of the City's population. While Hispanics represent 10% of the city's population, Hispanic households make up 20% of the moderate-income households (80-100% of AMI) experiencing a severe housing problem.

Disproportionate housing cost burden were also identified for African American households experiencing a severe cost burden.

Because African American households are disproportionately facing more cost burden issues, it can be concluded that more Hispanic and Asian households are experiencing more housing problems such as housing quality and overcrowding issues. These groups identified, people of color including Asians, Hispanics, African Americans, and American Indian, Alaska Native, may face disproportionate housing needs of cost burden and housing problems due to greater unemployment rates and lower incomes.

According to the 2022 5-Year ACS estimates, the City's overall employment was 5%, while the unemployment rate for people of color was 7%. These groups are also more likely to have employment in jobs that pay wages lower than the median income level. According to the 2013-2022 5-Year ACS estimates, the citywide median household income is \$69,919, while the median household income for African American households is \$40,218, the median household income for Asian households is \$66,016, the median household income for Hispanic households is \$53,113 and the median household income for American Indian, Alaska Native households is \$34,474. The higher unemployment rates and lower incomes combined with a tight rental market and low supply of affordable housing lead many in these groups to experience disproportionate housing needs.

**Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?**

The City has geographic areas where the racial and ethnic groups that have disproportionately greater housing need are concentrated. To be considered an area of higher concentration, such subpopulations of disproportionately greater need represent at least one-third of the residents living in a particular census tract for racial groups or at least one-fourth of the residents living in a particular census tract for ethnic groups. These census tracts are illustrated in a map titled Concentrations of Disproportionately Greater Need Subpopulations in Attachment B and include:

- African American residents in census tracts 335, 336, 337, 339 in the Summit-University neighborhood, census tracks 324 and 428 in the Frogtown neighborhood, census tract 376.03 in the Highland Park neighborhood, and census tract 374.03 in the Battle Creek/Highwood Hills neighborhood;
- Asian residents in census tract 327 within the Frogtown neighborhood, census tracts 313 and 305 within the North End neighborhood, census tracts 306.01, 306.02, 309, 310, 311, 315, and 316 within the Payne-Phalen neighborhood, census tracts 317.01 within the Dayton's Bluff neighborhood, census tracts 307.03 and 317.02 within the Greater East Side neighborhood;

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- Hispanic residents in census tract 372 within the West Side neighborhood and census tract 318.01 within the Greater East Side neighborhood.

## **NA-35 Public Housing – 91.205(b)**

### **Introduction**

The Saint Paul Public Housing Agency (PHA) owns and operates the City's public housing units. PHA's mission statement is “The PHA helps families and individuals with low incomes achieve greater stability and self-reliance by providing safe, affordable, quality housing and links to community services.”

The PHA owns and manages 418 public housing units and 3,836 units with Project-Based Rental Assistance (PBRA) that were converted from public housing via HUD’s Rental Assistance Demonstration (RAD) effective January 1, 2020. The PHA also administers 5,243 Housing Choice Vouchers (as of January 2025). These include 175 Family Unification Program (FUP) vouchers, 318 Mainstream Program/Disability vouchers, 276 Veterans Affairs Supportive Housing (VASH) vouchers and 157 Emergency Housing Vouchers (EHV). PHA has allocated 864 project-based vouchers (PBVs); and more than half of those (510) are in supportive housing developments. In total, the PHA provides nearly 9,500 affordable homes to more than 21,000 people.

The PHA has maintained its High Performer status under HUD’s Public Housing Assessment System (PHAS) for 32 consecutive years. The PHA does not administer HOPE VI activities or Mixed-Finance Modernization and Development. PHA has also maintained its High Performer status under HUD’s Section 8 Management Assessment Program (SEMAP) for 23 consecutive years. The PHA 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 Saint Paul with their plans to end homelessness.

PHA serves households with low to extremely low incomes. Most (79%) of residents and participants are “extremely low-income” households, earning an income of less than 30% of AMI. The average household size is 1.94 in the multifamily program and 4.6 in the public housing program. The average household income is \$18,947 in multifamily and \$38,495 in public housing.

**Totals in Use**

Program Type									
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	0	387	4,570	610	3,960	NO DATA	NO DATA	NO DATA

**Table 22 - Public Housing by Program Type**

\*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source: PIC (PIH Information Center)

**Characteristics of Residents**

Program Type									
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	
Average Annual Income	0	0	38,495	18,588	14,680	19,189	NO DATA	NO DATA	
Average length of stay	0	0	NO DATA	NO DATA	NO DATA	NO DATA	NO DATA	NO DATA	NO DATA

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Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers				
				Total	Project - based	Tenant - based	Special Purpose Voucher	
							Veterans Affairs Supportive Housing	Family Unification Program
Average Household size	0	0	4.6	2.4	2.1	2.4	NO DATA	NO DATA
# Homeless at admission	0	0	0	NO DATA	NO DATA	NO DATA	NO DATA	NO DATA
# of Elderly Program Participants (>62)	0	0	NO DATA	1,264	127	1,137	NO DATA	NO DATA
# of Disabled Families	0	0	NO DATA	NO DATA	NO DATA	NO DATA	NO DATA	NO DATA
# of Families requesting accessibility features	0	0	NO DATA	NO DATA	NO DATA	NO DATA	NO DATA	NO DATA
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 23 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

**Race of Residents**

Program Type									
Race	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	22	1,227	157	1,070	NO DATA	NO DATA	NO DATA

Program Type									
Race	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Black/African American	0	0	162	2,828	372	2,456	NO DATA	NO DATA	NO DATA
Asian	0	0	185	216	18	198	NO DATA	NO DATA	NO DATA
American Indian or Alaska Native	0	0	7	103	24	79	NO DATA	NO DATA	NO DATA
Pacific Islander	0	0	0	0	0	0	NO DATA	NO DATA	NO DATA
Other	0	0	11	196	37	159	NO DATA	NO DATA	NO DATA

\*Includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Table 24 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

**Ethnicity of Residents**

Program Type									
Ethnicity	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	5	171	235	37	198	NO DATA	NO DATA	NO DATA
Not Hispanic	0	72	4,005	4,335	573	3,762	NO DATA	NO DATA	NO DATA

\*Includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Table 25 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)



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**Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:**

It is Saint Paul PHA's policy to fully comply with all applicable federal, state, and local laws and ordinances, including Section 504, such that Saint Paul PHA shall give a qualified person with a disability, through a reasonable accommodation, an equal opportunity to participate in and benefit from its housing, aid, benefit, or service.

As of January 2025, approximately 20% of the over 5,500 households on the Saint Paul PHA multifamily waiting list had reported that they were disabled. Households with a disabled head of household, cohead, or spouse may be eligible for a disability allowance. Many applicants for public housing, multifamily, or housing choice vouchers need housing with one or more accessibility features, such as no-step approaches, grab bars in bathrooms, and easily operated door handles. At the same time, many PHA applicants need accessible housing that is affordable, as their average household income is often just slightly over the federal poverty rate (defined in 2024 as \$15,060 for an individual, \$31,200 for a household of four).

Since Section 504 also recognizes that residents with challenges may need additional services, Saint Paul PHA also offers the following services:

- **Congregate Housing Services Program (CHSP)** provides an individualized program for residents who are elderly or disabled and require a moderate amount of non-medical services to maintain independence.
- **Wilder Assisted Living Program (ALP)** provides comprehensive supportive services to assist frail or disabled residents at risk of nursing home placement.
- **The Accessible Space Inc. (ASI)** provides up to 24-hour personal care attendant service and support services for residents who experienced brain injuries. Other ASI participants include PHA residents with memory impairments, mobility impairments and/or complications from diabetes.

PHA also maintains past improvements at its hi-rises, community centers and other locations that made the common restrooms, common areas, corridors, elevators, parking lots and entries fully accessible. The PHA Central Administrative Office building meets all Section 504 and ADA requirements.

**Most immediate needs of residents of Public Housing and Housing Choice voucher holders**

There is a great need for more affordable housing for all bedroom sizes. All PHA waiting lists (public housing, multifamily, and Housing Choice Voucher) are currently closed with thousands of applicants on the lists and expected wait times of multiple years.

### **How do these needs compare to the housing needs of the population at large**

Applicants for Saint Paul Public Housing programs have similar housing needs to many Saint Paul residents. Low- and moderate-income households need housing that is affordable compared to their income and family size. However, such affordable housing demands exceed the city's current housing supply. Currently, Saint Paul PHA consistently operates at a 99% occupancy rate and its waiting lists remain closed. At the same time, low- and moderate-income residents have few private market alternatives especially when the private rental market of the Twin Cities has a 4.6% rental vacancy rate metro-wide (CoStar, January 2020), which is less than the nationwide average rental vacancy rate of 6.8% (U.S. Census Bureau, third quarter 2019). Consequently, the lack of affordable housing in the Twin Cities effectively reduces housing choice for many low- and moderate-income residents.

### **Discussion**

The lack of affordable housing effectively reduces housing choice for many Saint Paul residents. At the same time, economic conditions can discourage the preservation of affordable housing. In response, the City Council passed resolution 18-1204, calling for action to create and preserve housing that is 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; and continue to fund down payment assistance for first-time homebuyers. This resolution is a public acknowledgement that housing, especially affordable housing, is a priority for the City.

The 2040 Comprehensive Plan supports affordable housing development. Affordable housing priorities are preservation and production of rental housing affordable for those at or below 30% of AMI; create homeownership opportunities for households with low- and moderate-incomes; housing preservation for low-income elderly homeowners between 0-50% of AMI; and provide housing for special needs populations. Policy H-32 states "Continue to use City/HRA resources to support affordable rental housing citywide with at least 30 percent of the total rental units (both market-rate and affordable) financially assisted by the City/HRA being affordable to households earning 60 percent or less of AMI with at least: 10% of all units being affordable to households earning 30% of AMI; 10% of all units being affordable to households earning 50% of AMI; and 10% of all units being affordable to households earning 60% of AMI."

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Even with significant barriers, there have been 119 market rate and 246 affordable housing units built in Saint Paul in 2024. With limited financial capacity, the City must partner with HUD, Minnesota Housing Finance Agency, and private foundations to finance affordable housing developments.

## **NA-40 Homeless Needs Assessment – 91.205(c)**

### **Introduction:**

This section provides statistical data to describe the needs for shelters for adults and families experiencing homelessness. That said, the number of people in shelters - including adult singles, youth, and families – often exceed the capacity of shelters. The groups discussed in this section are:

- Homeless families
- Homeless adults
- Homeless youth/unaccompanied youth
- Homeless veterans and their families
- Chronically homeless individuals
- Persons with HIV
- Sheltered and unsheltered homeless

Ramsey County Continuum of Care (CoC) annually conducts a point-in-time study those experiencing homelessness in Ramsey County. Most recently available data is from January 2023. Additionally, every three years since 1991, Wilder Research has conducted a statewide survey of those experiencing homelessness. The most recent study took place on October 26, 2023. That said, point-in-time surveys identify needs and characteristics of homeless residents on a certain day. Wilder Research states that if the point-in-time study was extended over a longer period, many short-term episodes of homelessness would be reported, but relatively few long-term episodes would be captured.

## Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	566	15	671	NO DATA	NO DATA	166
Persons in Households with Only Children	23	0	NO DATA	NO DATA	NO DATA	NO DATA
Persons in Households with Only Adults	723	353	NO DATA	NO DATA	NO DATA	315
Chronically Homeless Individuals	197	250	NO DATA	NO DATA	NO DATA	NO DATA
Chronically Homeless Families	15	2	NO DATA	NO DATA	NO DATA	NO DATA
Veterans	75	15	NO DATA	NO DATA	NO DATA	NO DATA
Unaccompanied Child	73	49	NO DATA	NO DATA	NO DATA	NO DATA
Persons with HIV	87	7	NO DATA	NO DATA	NO DATA	NO DATA

Table 26 - Homeless Needs Assessment

Alternate Data Source Name: Ramsey County CoC

Data Source Comments: Data Source: Point-in-Time Ramsey County CoC 2023

**If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):**

Definition of Homeless Residents: individuals are considered homeless if they lack a fixed, regular, & adequate nighttime residence and either (a) have 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, (b) have a primary nighttime residence that is a supervised, publicly- or privately- operated shelter designated to provide temporary living arrangements (i.e. emergency shelters, transitional housing, battered women's shelters), or (c) are an individual who resided in a shelter or place not meant for human habitation and is exiting an institution where he or she temporarily resided.

Definition of Long-term Homeless Residents: individuals are considered chronically homeless if they have either (a) been homeless for a year or longer or (b) been homeless at least four times in the past three years.

Definition of Homeless Youth: youth (including minors aged 17 and under and young adults aged 18-24) are considered homeless if they have no parental, substitute, foster or institutional home to which they can safely go. They are unaccompanied by an adult and have spent at least one night in a formal emergency shelter, improvised shelter, doubled up or on street.

Wilder Research's most recent 2023 Minnesota Homeless Study and studies from previous years provide general statistics about populations experiencing homelessness in Minnesota and the Twin Cities,

#### Homeless Families

- Families with children under 18 make up nearly half (48%) of the homeless population in the Twin Cities metro.

- There's been a 19% decrease in the number of children who were homeless with their parents since 2018.

#### Homeless Adults

- More than three-quarters (77%) of people experiencing homelessness identify as a person of color, and nearly half the homeless population identifies as Black (45%) in the Twin Cities metro, even though they make up only 16% of St Paul residents
- In the Twin Cities metro, 19% of homeless adults were diagnosed with substance abuse disorder, 51% reported a physical health condition, 56% reported a significant mental illness
- More than half (51%) of people experiencing homelessness in Minnesota first experienced homelessness before they turned 24.
- People who do not stay in a formal shelter but stay outside, on transit, or temporarily doubled up make up about 18% of experiencing homeless.
- Older adults (age 55+) were the only age group that saw an increase over 2018 (7%). Although older adults are a growing group of people experiencing homelessness, they are still least likely to be homeless compared to their numbers in the overall population of Minnesotans.

#### Homeless Youth/Unaccompanied Youth:

- 60% of homeless youth in Minnesota are living in the Twin Cities
- 36% of homeless youth have lived in a foster home
- 18% of homeless youth identified as lesbian, gay, bisexual or unsure about sexual orientation
- 57% of homeless youth report some type of significant mental illness; 36% report some type of chronic physical health issues
- Children and youth (age 24 and younger) account for 17% of those experiencing homelessness in Ramsey County.
- Since 2018, there was a 19% decrease in the number of children who were homeless with their parents.
- There was a 17% decrease in the number of homeless youth (age 24 and younger) on their own without their parents.

#### Homeless Veterans

- In Ramsey County, 17% of men experiencing homelessness have served in the U.S. Military, compared to 2% of women



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- 46% of Minnesota Veterans experiencing homelessness identify as Native American, Black, Asian, or Hispanic/Latino, which is an overrepresentation compared to Minnesota’s overall Veteran population (less than 10% of the population)
- 87% of Veterans experiencing homelessness in Minnesota reported having at least one serious or chronic disability (mental health condition, substance abuse disorder, chronic medical condition, cognitive impairment, or other condition that limits work or activities of daily living).
- 57% of homeless Veterans are part of the Minnesota Homeless Veteran Registry, a program that connects Veterans experiencing homelessness with housing and services in their community.

### Long-Term (Chronically) Homeless Individuals

- In Ramsey County, 59% of women and 60% of men experiencing homelessness have been without a regular or permanent place to live for a year or more.
- 64% of long-term homeless have a serious mental illness, compared to 54% of other homeless adults
- 25% have a substance abuse disorder diagnosis, compared to 15% of other homeless adults
- 47% of long-term homeless have a condition that limits work, compared to 37% of other homeless adults

**Nature and Extent of Homelessness: (Optional)**

<b>Race:</b>	<b>Sheltered (emergency shelter)</b>	<b>Sheltered (transitional housing)</b>	<b>Unsheltered (optional)</b>
Black/African American	242	105	127
American Indian or Alaska Native	40	6	32
Asian or Pac Islander	40	5	34
Multiracial	33	5	26
White	230	38	127
<b>Ethnicity:</b>	<b>Sheltered (emergency shelter)</b>	<b>Sheltered (transitional housing)</b>	<b>Unsheltered (optional)</b>
Latinx	42	14	21

**Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.**

**Homeless Families with Children:** According to Saint Paul/Ramsey County CoC 2023 Point-in-Time data, there are 194 households in Ramsey County with at least one adult and one child that are experiencing homelessness, and 17 that are chronically homeless. The 2023 Minnesota Homeless Study conducted by Wilder Research reports a 19% decrease in the number of children homes with their parents since 2018. According to that study, 60% of Ramsey County respondents that have children aged 17 or younger are women. People in families (with children under 18) account for 4 out of 10 people experiencing homelessness in Minnesota and children under age 18 with parents make up 29% of people experiencing homelessness in the Twin Cities Metro. In Ramsey County, 56% of the children living with parents experiencing homelessness are age 5 or younger.

Data collected by Saint Paul Public Schools (SPPS) identified approximately 1,739 children who experienced homelessness in Saint Paul during the 2023-2024 school year. So far in the 2024-2025

school year, over 1,000 students have experienced homelessness. The following narrative is from SPPS staff who work closely with students and families that experience unstable housing:

*For students and their families in St Paul schools, affordable housing is very difficult to find and there are limited choices of available housing. For those with vouchers for section 8 housing, there is limited housing stock and some who run out of time finding their housing and lose their vouchers due to the limited availability. Students and families want to stay in St Paul so that their children can attend SPPS and without housing, this becomes really challenging.*

*Another challenge is with our students and their families seeking shelter. There are over 30 families on the waitlist with Coordinated Access for Housing for families and the waitlist can last up to four weeks. This means that there can be upwards of 28 days for a family to wait and try to piece together a plan for their children while waiting. In Ramsey County at this time, there are only 165 family shelter beds available on any given night, so over 70% of our students are typically doubled up and precariously housed.*

*St Paul students and families struggle to find safe, reliable and adequate housing. Having a concerted look at housing access is necessary to maintain a healthy community and will help our schools stay healthy and will assist with our enrollment levels.*

Wilder Research reports that the median income for people experiencing homelessness is only \$300 per month in the Twin Cities Metro Area. While homeless families may have higher incomes than homeless single adults, private market housing is still an unattainable goal. The average monthly rent for a one-bedroom apartment in the Twin Cities Metro Area is \$1,115, which is too costly for residents with incomes such as Minnesota Family Investment Program (MFIP), General Assistance, Social Security, and Day Labor. Consequently, the inability of low-income families to secure and maintain affordable housing can severely impact a child's development. In addition to the trauma of having no stable residence, homeless children often go without necessities, such as medical care, meals, and clothing, and experience learning problems. Most homeless residents cannot secure permanent housing especially when government-assisted housing is limited.

**Homeless Families of Veterans:** According to Saint Paul/Ramsey County CoC 2023 Point-in-Time data, there were 90 veterans experiencing homelessness in Ramsey County. According to the Veterans Experiencing Homelessness – Findings from the 2018 Minnesota Homeless Study, (Wilder Research, January 2020), 56% of women reported that they had children under the age of 18, while 22% of men reported the same. Twenty-five percent of women and 2% of men were accompanied by their children on the night of the study.

### **Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.**

There is an overrepresentation of Native American, Black, and Hispanic/Latino people experiencing homelessness in the Twin Cities metro. According to the 2023 Minnesota Homeless Study Issue Brief, 77% of people experiencing homelessness in the Twin Cities metro identify as a person of color, and 45% of the homeless population identifies as Black or African American, 20% identifying as Hispanic or Latino, 18% as Native American, and 4% as Asian.

In Ramsey County, 56% of women and 49% of men experiencing homelessness identify as Black or African American, while only 13% of the county's population is Black or African American. Nine percent of Ramsey County's population is Hispanic or Latino, while 10% of women and 11% of men experiencing homelessness identify as Hispanic or Latino. One percent of Ramsey County's population are Native American, compared to 16% of the women and 12% of the men experiencing homelessness are Native American. This trend differs for white and Asian population. In Ramsey County, 16% of the population is Asian, compared to the statistic that 5% of women and 7% of men experiencing homelessness are Asian.

### **Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.**

According to recent Ramsey County CoC Point-in-Time surveys, the number of persons in an emergency shelter has increased each year. In 2021, the number of persons in emergency shelter rose to 1133, an increase of 28 percent. Further, in 2021, the number of unsheltered persons rose to 314. – an increase of 76 percent.

**Sheltered Homelessness-Single Adults:** Over the last few years, Catholic Charities has developed new facilities and services that will greatly improve their ability to reach out and help the community. The Dorothy Day Center campus has two new buildings. The first building, *Higher Ground Saint Paul*, opened in January 2017. This five-story building has emergency shelter and permanent homes for 470 people, along with added space for medical services. The second building, The St. Paul Opportunity Center, or SPOC, opened in October of 2019 and helps to serve the homeless population in Saint Paul by providing 177 affordable apartments as well as a resource center. The facility is open daily and connects people to key services to improve their health, income, housing stability, and overall well-being. This In addition, overflow shelter demands have been so great that the City and Ramsey County have committed to extending the 64-bed winter overflow homeless shelter, now called *Safe Space Shelter*, to be operated year-round by Model Cities.

**Sheltered Homelessness-Homeless Families:** Catholic Charities Family Service Center is the main Ramsey County emergency shelter (65 beds) for homeless families in addition to the 40 shelter beds provided by Project HOPE. The need for housing for families remains great. In 2018, Ramsey County

Coordinated Access received 1,204 total calls from eligible Ramsey County families seeking housing or shelter and 795 families were placed on the waitlist for shelters.

**Unsheltered homelessness:** In years past, it has been difficult to determine the actual number of unhoused people who are unsheltered on a particular day. However, due to the creation of winter warming spaces located throughout areas in St. Paul (with high concentration of homeless individuals in Ramsey County), staff have been better able to accurately capture the numbers of unsheltered in Ramsey County. The CoC’s 2024 Point-in-Time (PIT) survey reports an unsheltered population of 410 – an increase of 23 percent since 2019. Although the PIT count has been enhanced to capture those in warming spaces, as well as outdoor encampments, the annual survey may still miss persons who are doubled-up, sleeping outside, or living in unknown locations not typically meant for human habitation. It can be extrapolated that estimates of the “non-shelter users” may be 20 percent of the shelter-using population, depending upon the availability of shelter openings, seasons, and weather conditions. Still, more spaces in emergency shelters are needed. More importantly, chemical dependency, mental illness, and traumatic brain injury are often major reasons why unsheltered homeless residents are reluctant to choose living in a shelter, transitional housing, or permanent supportive housing.

**Discussion:**

While the unhoused and unsheltered populations are increasing, there has been improvements in shelter spaces and services. These improvements are still insufficient to meet ideal outcomes that include enough housing and related support services to get everyone on a pathway to stable housing and general well-being.

## **NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)**

### **Introduction:**

This section discusses the special needs assessment of Saint Paul residents who are not homeless but require supportive housing or support services. Within the City, many families and individuals struggle with multiple barriers to secure and maintain housing. Consequently, these residents are more likely to have lower incomes, have difficulty paying housing and utility costs, or have individual concerns that require enhanced community services. The groups discussed in this section include:

- Elderly
- Frail Elderly
- Persons with Physical Challenges, Persons with Developmental Challenges, and Persons with Mental Health Challenges
- Persons with Chemical Dependency Issues, such as alcohol or other drug addictions
- Persons with Limited English Proficiency
- Persons with HIV/AIDS

### **Describe the characteristics of special needs populations in your community:**

**Elderly and Frail Elderly:** According to the 2023 5-Year ACS estimates, Saint Paul has 36,352 elderly (age 65 and older) persons, and the State Demographic Center forecasts dramatic growth for Saint Paul elderly during the next 20 years as the "baby boomers" continue to enter retirement age. Saint Paul has 3,574 cost-burdened elderly homeowner households and 4,995 cost-burdened elderly renter households (2016-2020 CHAS). In 2021, Ramsey County provided case management to 1,192 County residents for services for people 65 years old and older who require the level of care provided in a nursing home but choose to live in the community. Saint Paul elderly will need to maintain their homes, make updates, or seek housing alternatives with universal design. Moreover, as elderly live longer, the frail elderly will place significant demands on both institutional and community-based long-term care services (i.e. assisted-care housing or in-home care services).

**Residents with Developmental, Physical, Mental Health Challenges or Persons with Chemical Dependency:** According to 2022 5-Year ACS estimates, Saint Paul has approximately 19,108 residents with a cognitive difficulty. These residents may have difficulty remembering, concentrating, or making decisions because of a physical, mental, or emotional problem. In 2021, Ramsey County provided case management to 3,159 County residents through its Developmental Disability waiver and non-waiver programs, 5,592 County residents through its Community Access for Disability Inclusion waiver program, and 133 County residents through its Brain Injury waiver program. 59% of these residents were under age 55. The 2022 5-Year ACS also estimates Saint Paul has 15,017 residents with an ambulatory difficulty - highlighting the need for accessible-designed housing. In 2023, Ramsey County provided mental health case management to approximately 4,126 individuals for services to provide comprehensive psychiatric treatment and support so that people with serious and persistent mental illness can live in the

community. Residents in recovery from chemical dependency issues need sober housing. In contrast, chronically inebriated residents need a "Housing First", harm-reduction housing program.

**Residents living with HIV/AIDS:** According to Minnesota Department of Health 2023 data, there are 1,137 residents living with HIV/AIDS in Saint Paul.

**Residents with Limited English Proficiency:** According to 2022 5-Year ACS estimates, Saint Paul has approximately 38,771 residents who speak English "less than very well".

### **What are the housing and supportive service needs of these populations and how are these needs determined?**

**Housing and supportive needs for Elderly and Frail Elderly:** Saint Paul elderly and frail elderly residents continue to need affordable housing options, accessible design modifications, and supportive services to support independent living, especially when elderly residents may place significant demands on both institutional and community-based long-term care services. Wilder Research also reports the need to offer multi-lingual and multi-cultural programs since many of Saint Paul's elderly residents are African American, Latino, and Asian-American, which was corroborated by the public engagement and consultation process. For cost-burdened homeowners, home improvement programs and community services, such as utility and rehabilitation assistance, may be needed for the elderly to maintain their homes. That said, cost-burdened renters will always need affordable rental housing. These needs were corroborated through the public engagement and agency consultation process with service providers.

**Housing and supportive needs for persons with Developmental, Physical, Mental Health Challenges, and Persons with Chemical Dependency:** There is a need for affordable housing with support services as well as community-based services and case management. The Minnesota Council on Disability also recommends affordable accessible-designed housing for physically challenged residents with limited incomes. Accessible-designed housing with support services can empower residents to achieve self-sufficiency. The State Mental Health Act encourages community integration for persons with mental health challenges. Affordable housing is a priority concern for individuals with serious and persistent mental illness, especially for those individuals on fixed income whose social security income is insufficient to pay rent. In addition to affordable housing, access to supportive services and treatment opportunities is important for those with mental illness. Persons with chemical dependency need supportive services, affordable sober housing, and safe haven for the chronically inebriated. These needs were corroborated through the agency consultation process.

**Housing and supportive needs for Persons with Limited English Proficiency (LEP):** Community development and social service organizations expressed that Saint Paul's new Americans and immigrant population can experience housing problems due to language barriers, vulnerable residency status, and lack of access to, or knowledge of, resources. Saint Paul's new Americans and newly arrived refugees

need stable affordable housing that is adequate for their family size, which may include accommodating multi-generational living. Since refugees and immigrants are simultaneously learning a new language, new culture, and marketable job skills, these residents need to be able to access housing information, programs, and services in their primary language. Increased culturally relevant outreach and programs are needed to ensure that these residents have equal opportunity to accessing facilities and services. In response, the City and community service providers have multi-lingual staff to provide resources and community organizations offer culturally relevant, multi-lingual support programs and services directed to these populations.

**Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:**

According to Minnesota Department of Health 2023 data, there are 1,137 residents living with HIV/AIDS in Saint Paul. According to the *2020 HIV/AIDS Comprehensive Needs Assessment* of people living with HIV in Minnesota and Minneapolis-St. Paul Transitional Grant Area conducted by the Hennepin County Public Health, Minnesota Department of Human Services, and the Minnesota Council for HIV/AIDS Care and Prevention, 17% of Minnesotans living with HIV reported to have unstable housing, which includes having unsafe and/or unaffordable housing and/or are homeless.

Persons living with HIV/AIDS often have lower incomes than the rest of the population. According to the *2020 HIV/AIDS Comprehensive Needs Assessment*, 41% of the Minnesotans living with HIV are living at or below the poverty level. An estimated 27% of Minnesotans living with HIV received emergency financial assistance and another 22% needed the service but did not access it. According to Saint Paul/Ramsey County CoC 2023 Point-in-Time data, there were 94 persons with HIV/AIDS that experienced homelessness. For medical reasons, persons living with HIV may have difficulty maintaining long-term employment.

Most importantly, persons with HIV/AIDS need affordable housing. Virtually, all adults receiving supplemental security income (SSI) benefits without government housing assistance would qualify under federal guidelines as households with “worst case” housing needs. Thus, persons living with HIV/AIDS have a strong need for affordable housing, rental housing, mortgage assistance, and supportive housing alternatives.

**If the PJ will establish a preference for a HOME TBRA activity for persons with a specific category of disabilities (e.g., persons with HIV/AIDS or chronic mental illness), describe their unmet need for housing and services needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2) (ii))**

**Discussion:**



While the City of Saint Paul is aggressively providing financing for affordable housing and affordable supportive housing, the overall demand remains overwhelming. The City recognizes the diversity of its residents. Housing data for the City demonstrates that the greatest needs and highest housing priorities are affordability, choice, and supply. Consistent with the City's 2040 Comprehensive Plan – Housing Chapter, affordable housing priorities are: preservation and production of rental housing affordable for those at or below 30% of AMI; create homeownership opportunities for households with low and moderate incomes; housing preservation for low-income elderly homeowners between 0-50% of AMI; provide housing for special needs populations. During the next five years, the City will continue to serve low- and moderate-income residents by preserving existing affordable housing, increasing production of affordable housing units, supporting the development of wider variety of housing types to meet a continuum of housing needs. The City will continue to actively work with its partners to produce affordable housing and affordable supportive housing opportunities. The City, County, State, and community agencies are providing support services that encourage independent living, as needed, for persons with special needs.

## **NA-50 Non-Housing Community Development Needs – 91.215 (f)**

### **Describe the jurisdiction’s need for Public Facilities:**

Saint Paul has over 30 recreational facilities (which include senior centers, youth centers, and neighborhood facilities), 4,000 acres of parkland, more than 80 tot lots, a zoo and conservatory, four golf courses, and 13 library facilities located throughout the city. This property and assets require regular maintenance, periodic improvement, expansion, or replacement. Currently, 25 of the 42 recreation center buildings have been evaluated to be of poor quality. The Parks & Recreation Department has estimated the costs of its needed improvements to be approximately \$5.4 million each year to maintain their facility condition sustainability target, in addition to an approximate \$42 million backlog of deferred maintenance for those buildings.

Over the next five years, the Saint Paul Public Library foresees having significant capital improvement needs across its system (estimated \$15-20 million) for deferred maintenance, repairs, equipment replacement, and renovations. Major capital initiatives during this period are encompassed in the Transforming Libraries project which is comprised of construction of a new Hamline Midway Library and large-scale renovation at the Hayden Heights and Riverview Library locations, as well as system-wide technology upgrades and development of dynamic play and learn spaces for youth and families.

The primary source for park and library capital investments is property taxes, but CDBG funding is also used for capital investments in facilities which primarily serve low- and moderate-income areas of the City. The City anticipates that it will continue to use CDBG funding for eligible public facility activities over the next five years.

### **How were these needs determined?**

Each City of Saint Paul department is responsible for assessing its needs. The Parks and Recreation Department worked with a consultant throughout 2022-2023 to develop the City of Saint Paul Parks and Recreation System Plan, which was largely based on community and stakeholder input, policy direction from the City’s 2040 Comprehensive Plan, and innovative research and analysis. Adopted in 2023 with the intended implementation of recommendations for 2024 onwards, this plan serves as a comprehensive guide to physical improvements and modifications to parks, athletic fields, recreation centers, trails and other parks and recreation facilities. In addition, the Department continues to utilize the data to inform capital investment decision-making from the comprehensive asset management study that was completed in 2018 and included an assessment of the current condition of every facility/asset owned by the department and a list of needs with costs for each asset over the next 30 years.

After an extensive community and professional engagement effort, the Saint Paul Public Library adopted the 2024-2027 Strategic Direction to guide the department’s work for the next four years. The department engaged a consultant to develop a Facilities Master Plan. Completed in 2020, the Plan

analyzes how the facilities can best meet programmatic, community, and workflow needs and address structural, design and physical needs for all buildings, grounds, furnishings, and signage. The Plan includes recommendations, priorities, and cost estimates for implementation through 2025.

**Describe the jurisdiction’s need for Public Improvements:**

The City owns and maintains \$3 billion worth of infrastructure, including more than 1,874 miles of streets, 806 miles of sanitary sewer, 450 miles of storm sewer, 107 bridges, and 229 miles of bike lanes. The repair and replacement of this infrastructure is very important to the City, and these types of improvements are predominantly financed with several local, County, State, and other Federal funding sources. Because of this, CDBG funds are generally not used for infrastructure activities. The City does not anticipate using CDBG funds for infrastructure improvements over the next five years, but sidewalks, street, and sewer improvements may possibly be funded with CDBG if they meet a national objective of the program and if other funding sources are not available.

**How were these needs determined?**

The Department of Public Works relies heavily on the CIB process to finance its capital plan. The CIB budget is prepared on bi-annual basis. The CIB committee is comprised of 18 Saint Paul citizens representing each of the Minnesota senate districts located in Saint Paul. The committee is charged with hearing project proposal presentations, scoring projects, and offering comments. After review and public hearing, the CIB Committee makes recommendations to elected officials on capital investments over the next two years. These recommendations are transmitted to the Mayor for review and approval by the City Council. The CIB Committee also reviews community partner requests for sub-recipient grants of CDBG funds.

The Department of Public Works has established a five-year plan that is updated and reviewed annually. Public Works has established criterion for inclusion of road improvement projects into the five-year plan. This criterion relies on the pavement condition index score of the road, the average daily traffic, maintenance demand and the age of the street. Other considerations include adjacent development, safety concerns, utility work, small area plans, bike plan and matching funds from other sources.

**Describe the jurisdiction’s need for Public Services:**

Ramsey County is the primary provider of public services in the City of Saint Paul. The County receives Federal, State, and local funding for health services, employment and training services, environmental services, and other human/social services. Since there is a significantly greater need for these types of activities in Saint Paul than the City/County collaboration can provide, City funding is also used (including traditionally up to 15 percent of CDBG funds) to provide additional public services for Saint Paul residents. Health services, senior services, crime prevention, community organizing, youth employment training, other youth services, as well as other public service activities are all currently funded with CDBG dollars. The City anticipates that it will continue to fund these types of activities over

the next five years. Based on the comments received through the Consolidated Plan agency consultation and public engagement process, the City is also seeing a need for bilingual and culturally relevant services, service-enriched housing, home buyer education, tenant and landlord education and counseling, additional youth services, and better coordination between agencies to allow for greater access to information for residents and business owners.

### **How were these needs determined?**

The City of Saint Paul is divided into 17 defined districts. Each of these districts is represented by a separate 501(c)3 organization known as a District Council. The City of Saint Paul contracts with these organizations for planning and advising on the physical, economic, and social development of their areas; identifying needs; initiating community programs; recruiting volunteers; and sponsoring community events. The City consults with these groups regularly, and additionally reached out as part of the Consolidated Plan development process in November and December 2024, specifically to weigh in on the needs and priorities of their districts. The results of the online survey also revealed public service needs.

City staff also consulted with City Departments, several public service providers, community organizations, and agencies, including Ramsey County, on the status of their current levels of services, unmet needs, and projected needs for the communities they serve.

# Housing Market Analysis

## MA-05 Overview

### Housing Market Analysis Overview:

The Market Analysis of the Consolidated Plan focuses on the following areas:

- Number and type of housing units within the City;
- Cost of housing;
- Condition of housing;
- Public and assisted housing;
- Homeless facilities and services;
- Special needs facilities and services;
- Barriers to affordable housing;
- Non-housing community developments assets; and
- Needs and market analysis discussion.

## MA-10 Number of Housing Units – 91.210(a)&(b)(2)

### Introduction

Saint Paul has a traditional housing stock that consists of single-family detached homes, single-family attached homes, including townhomes and twinhomes, as well as multi-family housing that includes duplexes, triplexes, apartments, and condominiums. According to 2020 ACS five-year data, Saint Paul’s one-unit detached housing (single-family homes), accounts for 49% of the housing units in the city while low-density housing with 2-4 dwelling units only accounts for 10% (down from 12% five years ago). Seventy percent of the ownership units are three or more bedrooms, while one-bedroom apartments represent 37% and two-bedroom apartments represent 32% of the rental units. Only 20% of rental units have three or more bedrooms. Saint Paul’s housing suppl increased by about 1,500 units over the last decade, the population grew by over 10,000 in about that same time frame (2011-2015 ACS, 2016-2020 ACS).

### All residential properties by number of units

Property Type	Number	%
1-unit detached structure	59,755	49%
1-unit, attached structure	5,440	4%
2-4 units	12,735	10%
5-19 units	14,470	12%
20 or more units	29,015	24%
Mobile Home, boat, RV, van, etc.	470	0%
<b>Total</b>	<b>121,885</b>	<b>100%</b>

**Table 27 – Residential Properties by Unit Number**

Data Source: 2016-2020 ACS

### Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	460	1%	5,760	10%
1 bedroom	2,605	4%	20,860	37%
2 bedrooms	14,735	25%	18,125	32%
3 or more bedrooms	40,740	70%	11,455	20%
<b>Total</b>	<b>58,540</b>	<b>100%</b>	<b>56,200</b>	<b>99%</b>

**Table 28 – Unit Size by Tenure**

Data Source: 2016-2020 ACS

**Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.**

According to information maintained by HousingLink, a Twin Cities-based non-profit housing advocacy organization, accessed in November 2024, there are 519 properties, including public housing, that have received federal, state, or local financial assistance in Saint Paul. Of the 22,840 housing units at these properties, 19,675 are affordable: 6,379 units for households earning up to 30% of AMI, 3,532 units for up to 50%, 9,141 units for up to 60%, and 593 units for up to 80%. Of the housing units that report the unit type, approximately 9% are efficiencies, 53% are one-bedrooms, 28% are two-bedrooms, 9% are three-bedrooms, and 1% are four- or more bedrooms.

**Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.**

According to HousingLink data accessed in November 2024, Saint Paul has approximately 1,485 affordable units that could be lost between 2025 and 2029 from the affordable housing and rent subsidized inventory due to the expiration of contractual affordability requirements or Section 8 contracts. This assessment only represents those units that could potentially be lost due to contract expiration. According to the information maintained by HousingLink, there are six LIHTC-funded housing developments with earliest affordability contractual release between these dates. These properties contain 914 units of affordable housing—40 affordable units for households up to 30% AMI and 874 units for households up to 60% of AMI. HousingLink data identifies five developments that have 611 project-based Section 8 vouchers with contracts set to expire between 2025 and 2029. The City and Minnesota Housing are working and will continue to work with property managers and owners to preserve these affordable and rent-subsidized units.

**Does the availability of housing units meet the needs of the population?**

The available housing units do not meet the overall needs of the population. Overall, the housing units that have the adequate space to accommodate larger households are ownership units while the supply of larger rental units is limited. The converse is true for smaller households, where small rental units are ample, but small ownership units are limited. The CHAS data does not break out available senior housing opportunities or housing that has been designed for the needs of individuals with physical disabilities. Throughout the citizen engagement and agency consultation process, consultation groups identified a need for units that can accommodate low-income households, seniors, and residents needing services and support. Groups also highlighted a need for housing that would allow seniors to age in place. Affordable homeownership opportunities and affordable rental units were also indicated as highly needed.

### **Describe the need for specific types of housing:**

Since the City's population continues to grow, there is a need for all types and sizes of affordable housing. Specifically, there is a need for affordable homeownership units for small families and seniors who want to age in place, as only 4% of the ownership units are 1-bedroom units and 25% are 2-bedroom units. According to 2016-2020 CHAS data, only 46% of small family households earn up to 80% HAMFI and only 67% of large family households earn up to 80% HAMFI. There is a need for more affordable homeownership units that accommodate large families. There is also a need for affordable rental units for larger families, as only 20% of rental units are 3-bedroom units. Larger units are also needed to accommodate multi-generational families with elderly persons living in the household. Universally-designed, affordable, rental and ownership housing is needed for those with disabilities and the growing number of seniors who desire to age in place.

### **Discussion**

The City recognizes the need for more affordable housing units and a diverse stock of housing types to accommodate changing household demographics. The existing housing stock does not meet the overall needs for the population and there is a need for both affordable rental and homeownership units to accommodate small and large families, those with disabilities, and seniors.



## MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

### Introduction

As described in Section NA-10 of this Plan, one of the predominate housing-related problems in Saint Paul is the cost of housing for its extremely low- to moderate-income households. According to the HUD-reported 2009 Census and 2016-2020 ACS data, the median home value increased by 25% and median rent increased by 22%, while median household income increased by 22%. Although the 2016-2020 estimates were the most recent data provided by HUD, a review of more recent 2018-2022 ACS data reveals an increase in median home value since 2020 to \$264,900 and median rent since 2020 to \$1,174.

This section examines housing cost, rent paid, housing affordability, and monthly rents paid through federal programs.

### Cost of Housing

	Base Year: 2009	Most Recent Year: 2020	% Change
Median Home Value	173,900	217,100	25%
Median Contract Rent	757	925	22%

**Table 29 – Cost of Housing**

**Data Source:** 2000 Census (Base Year), 2016-2020 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	8,385	14.9%
\$500-999	25,330	45.1%
\$1,000-1,499	16,265	28.9%
\$1,500-1,999	4,525	8.1%
\$2,000 or more	1,705	3.0%
<b>Total</b>	<b>56,210</b>	<b>100.0%</b>

**Table 30 - Rent Paid**

**Data Source:** 2016-2020 ACS

### Housing Affordability

Number of Units affordable to Households earning	Renter	Owner
30% HAMFI	7,265	No Data
50% HAMFI	25,135	6,100

Number of Units affordable to Households earning	Renter	Owner
80% HAMFI	43,995	20,800
100% HAMFI	No Data	29,095
<i>Total</i>	<i>76,395</i>	<i>55,995</i>

**Table 31 – Housing Affordability**

Data Source: 2016-2020 CHAS

### Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	1,007	1,149	1,410	1,916	2,209
High HOME Rent	763	915	1,151	1,636	1,828
Low HOME Rent	763	915	1,125	1,300	1,450

**Table 32 – Monthly Rent**

Data Source: HUD FMR and HOME Rents

### Is there sufficient housing for households at all income levels?

There is not sufficient housing for households at all income levels in Saint Paul. The 2016-2020 CHAS data shows that there are only 7,265 rental housing units affordable to households earning 0-30% of AMI with 24,170 households at this income level. For owner-occupied housing, there is a lack of housing that is affordable to households earning 50% of AMI—approximately 6,100 ownership units are affordable to 17,885 households at 30-50% of AMI. This directly correlates to the significant number of households within these groups experiencing housing cost burden.

### How is affordability of housing likely to change considering changes to home values and/or rents?

According to the HUD-reported 2009 Census and 2016-2020 ACS data, the median home value increased by 25% and median rent increased by 22%, while median household income increased by 22% or 0.2% when adjusted for inflation. More recent 2018-2022 ACS data reports an increase in median home value by 22%, an increase in median rent by 27% and an increase in median household income of 17% between 2020 and 2022. With housing costs continuing to rise and wages not increasing at the same rate, housing cost burden is likely to continue to increase in Saint Paul over the next five years.

### How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

According to HousingLink, the median rent for Saint Paul in November 2024 is \$1,516 for two-bedroom units and \$1,969 for three-bedroom units, which is \$106 and \$53 greater than HUD's fair market rates for a two-bedroom unit and three-bedroom unit, respectively. This indicates that naturally occurring affordable housing (NOAH) will be increasingly difficult to find and attention to the preservation of affordable housing, especially those units that are contracted with for affordable rents.

According to the 2020 ACS data, the median monthly rent was \$925, which most closely aligns to Fair Market Rent for an efficiency unit and HOME rents for a one-bedroom unit. As there are significantly fewer larger apartments with resulting higher rents, this information could indicate a need to preserve or create larger affordable units with more bedrooms.

## **Discussion**

The predominant housing-related problem in Saint Paul is housing cost burden. Over the last decade, median home values and rents have increased at a level greater than median household incomes are increasing. There is not sufficient housing for households all income levels, specifically rental units affordable to households earning 0-30% of AMI and owner-occupied units affordable to households earning 0-50% of AMI. With housing costs continuing to rise and wages not increasing at the same rate, housing cost burden is likely to continue to increase in Saint Paul over the next five years.

## MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

### Introduction

The housing portion of the housing and market analysis section provides an overview of the city of Saint Paul’s housing stock. The section examines condition and age of housing units, risk of lead-based paint exposure, and vacant or abandoned buildings and their suitability for rehabilitation. This analysis uses 2016-2020 ACS and CHAS data provided by HUD and vacant housing data generated by the City of Saint Paul’s Department of Safety and Inspections.

### Definitions

HUD requests that the terms "standard condition" and "substandard suitable for rehabilitation" be defined within the Consolidated Plan. These terms are used when replacement housing is determined to be a desired use of HUD funds. HUD has determined that cities are in the best position to define these terms as they relate to their individual community. As such, Saint Paul has defined the terms as follows:

- Standard Condition: Properties which meet the Minimum Property Maintenance Standards for all structures and premises, as defined in Chapter 34 of the Saint Paul Legislative Code.
- Substandard Condition but Suitable for Rehabilitation: Properties that are not in standard condition but are structurally and financially feasible for rehabilitation. These properties have no serious structural deficiencies and the cost of rehabilitation to meet the Minimum Property Maintenance does not exceed 50% of the appraised value of the property after rehabilitation.

The Condition of Units table below displays the number of housing units by tenure, based on the number of “selected conditions” the unit has. A selected condition refers to one of the following problems: (1) lacks complete plumbing facilities, (2) lacks complete kitchen facilities, (3) more than one person per room, and (4) cost burden greater than 30%. Housing units with one or more selected conditions may be considered either "standard condition" or "substandard condition but suitable for rehabilitation".

### Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	12,465	21%	25,115	45%
With two selected Conditions	410	1%	2,835	5%
With three selected Conditions	15	0%	125	0%
With four selected Conditions	0	0%	4	0%
No selected Conditions	45,650	78%	28,125	50%
<b>Total</b>	<b>58,540</b>	<b>100%</b>	<b>56,204</b>	<b>100%</b>

**Table 33 - Condition of Units**

Data Source: 2016-2020 ACS

**Year Unit Built**

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	3,260	6%	6,250	11%
1980-1999	4,100	7%	8,710	16%
1950-1979	14,015	24%	21,955	39%
Before 1950	37,165	63%	19,280	34%
<b>Total</b>	<b>58,540</b>	<b>100%</b>	<b>56,195</b>	<b>100%</b>

**Table 34 – Year Unit Built**

Data Source: 2016-2020 CHAS

**Risk of Lead-Based Paint Hazard**

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	51,180	87%	41,235	73%
Housing Units build before 1980 with children present	4,310	7%	1,085	2%

**Table 35 – Risk of Lead-Based Paint**

Data Source: 2016-2020 ACS (Total Units) 2016-2020 CHAS (Units with Children present)

**Vacant Units**

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	367	22	389
Abandoned Vacant Units	NO DATA	NO DATA	NO DATA
REO Properties	NO DATA	NO DATA	NO DATA
Abandoned REO Properties	NO DATA	NO DATA	NO DATA

**Table 36 - Vacant Units**

**Alternate Data Source Name:** Vacant Properties

**Data Source Comments:** Saint Paul Vacant Building List, Saint Paul Open Information Portal, updated 12/27/2024. Class I and II shown under "Suitable for Rehabilitation". Class III shown under "Not suitable for Rehabilitation". Data is not available for Abandoned Vacant Units, REO Properties, and Abandoned REO Properties.

**Need for Owner and Rental Rehabilitation**

The data identifies a need for both owner and rental housing rehabilitation, which was corroborated by stakeholder input during the citizen participation process. The condition information provided through

the 2016-2020 CHAS data identifies that 22% of owner-occupied units and 50% of renter-occupied units have one of the selected conditions: (1) lacks complete plumbing facilities, (2) lacks complete kitchen facilities, (3) more than one person per room, and (4) cost burden greater than 30%. Only 1% of owner-occupied housing units and 5% of renter-occupied housing units have two or more selected conditions. It is estimated that most housing units with a selected condition have more than one person per room or a cost burden greater than 30% and that a very small number of housing units in Saint Paul suffer from the facilities deficits (e.g. lack of plumbing or complete kitchens) reported.

Age of the City's housing stock is an overall indicator for the ongoing need to focus on property maintenance efforts. Eighty-seven percent of owner-occupied units (primarily single-family homes) were built before 1980 with 63% being built before 1950. The age of the single-family housing stock coupled with the level of cost burden experienced by low-to-moderate income owners makes home maintenance issues critically important in the city. From a rental perspective, 73% of the units were built before 1980 with 34% built before 1950. The age and building type of buildings suggests that investments will need to be made in these units to provide decent rental housing stock into the future.

### **Estimated Number of Housing Units Occupied by Low- or Moderate-Income Families with LBP Hazards**

The City has 92,415 housing units that were built before 1980, indicating a Risk of Lead-Based Paint (LBP) Hazard. Approximately 68% of Saint Paul households are low- or moderate-income households earning up to 100% AMI; therefore, approximately, 63,000 of these 92,415 housing units are occupied by low- or moderate-income households.

### **Discussion**

As housing ages, it requires maintenance. If housing maintenance is deferred, it can lead to a decline in the city's housing stock. While maintenance is generally a good investment for property owners, major rehabilitation can sometimes cost more than it adds to the property value. This can create an economic disincentive for property owners to make substantial repairs to older properties. Another concern is that many households cannot afford maintenance for their properties, especially expensive major rehabilitations that may be required. There are both City and community housing rehab programs available with a variety of financial options to assist, many utilizing CDBG funds.

## **MA-25 Public and Assisted Housing – 91.210(b)**

### **Introduction**

The Saint Paul Public Housing Agency (PHA) is an important provider of affordable housing for thousands of Saint Paul households with the greatest need (households at or below 30% of AMI). The PHA owns and manages 418 public housing units and 3,836 units with Project-Based Rental Assistance (PBRA) that were converted from public housing via HUD’s Rental Assistance Demonstration (RAD) program, effective January 1, 2020. The PHA also administers 5,243 Housing Choice Vouchers (as of January 2025). These include 175 Family Unification Program (FUP) vouchers, 318 Mainstream Program/Disability vouchers, 276 Veterans Affairs Supportive Housing (VASH) vouchers and 157 Emergency Housing Vouchers (EHV). PHA has allocated 864 project-based vouchers (PBVs); and more than half of those (510) are in supportive housing developments. In total, the PHA provides over 9,500 affordable homes to more than 21,000 people.

Saint Paul PHA strives to provide excellent property management and maintenance for 16 hi-rises, 4 family housing developments and its 418 scattered site homes. Saint Paul PHA has strict but fair standards for its rental leases. Saint Paul PHA prepares its vacant units to high standards for each new resident. All emergency work orders are performed within 24 hours, and routine work orders in less than three days on average. All apartments are inspected at least twice annually to ensure local codes and HUD's standards are met. Saint Paul PHA's excellent property management and maintenance helps to maintain and improve the city's housing stock and promote neighborhood stability. Saint Paul PHA provides community policing in coordination with the Saint Paul Police Department, assisted living services for frail elderly and disabled residents, and others.

Effective January 1, 2020, most of the public housing units converted, debt-free, to HUD’s Project-Based Rental Assistance (PBRA) program via HUD’s Rental Assistance Demonstration (RAD). The conversion does not constitute “privatization of public housing”, because the PHA continues to own, manage, maintain and improve those former public housing units through long-term PBRA contracts. The initial 20-year contracts, by law, must be renewed; this ensures that the units remain permanently affordable to low-income households. Residents continue to pay 30 percent of their adjusted income towards the rent and will retain the same basic rights as living in PHA-owned housing. The primary benefit is more predictable, reliable funding.

## Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
				Veterans Affairs Supportive Housing	Family Unification Program	Disabled *			
# of units vouchers available	0	0	418	5243	864	4,379	276	175	318
# of accessible units	No Data	No Data	No Data	No Data	No Data	No Data	No Data	No Data	No Data
<b>*Includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition</b>									

**Table 37 – Total Number of Units by Program Type**

Data Source: PIC (PIH Information Center)

### Describe the supply of public housing developments:

### Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

The Saint Paul PHA owns and manages a total of 4,273 units comprised of 2,553 hi-rise units (including 19 special purposes units that house police officers or support services offices) and 1,720 family units (both now in Project-Based Rental Assistance/PBRA), and 418 scattered site single family houses and duplexes (still public housing). As explained below, 3,836 former public housing units were converted to PBRA via HUD’s Rental Assistance Demonstration (RAD) effective January 1, 2020.

All the PHA’s public housing and PBRA units are in good to excellent physical condition. The PHA has consistently achieved "High Performer" status under HUD's Public Housing Assessment System and a “Superior” rating in the initial HUD Management and Occupancy Review (MOR) in the Multifamily program. Saint Paul PHA properties continue to be managed to the highest possible standards, including thorough and uniform applicant eligibility determination, fair lease enforcement, regular preventative maintenance, prompt responses to maintenance work orders,



full occupancy, timely turnover of vacant units, and accurate reporting of financial data and all other components of quality property management and maintenance.

Many PHA units have been improved over the last five years, including the following:

- From 2020-2025, the PHA has completed 244 vacant unit modernizations in public housing units, which have included projects such as kitchen and bathroom remodels, electrical and plumbing upgrades, flooring replacements, and painting. Additionally, the PHA has completed capital improvements including siding replacements at 10 units, window replacements at 81 units, roof replacements at 113 units, retaining wall replacements at 28 units, driveway replacements at 19 units, and furnace/boiler replacements at 90 units.
- Installation of new plumbing at Front Hi-Rise (151 units).
- Exterior modernization of family dwelling units at Mt. Airy Homes. As of 12/31/2021, all 273 units in 91 buildings have been completed.
- Elevator modernization at Edgerton Hi-Rise, Valley Hi-Rise, Exchange Hi-Rise, Neill Hi-Rise, Central Hi-Rise, Cleveland Hi-Rise, and Dunedin Hi-Rise.

In addition to HUD funding, the PHA received financial assistance for these projects from the Minnesota Housing Finance Agency and the Federal Home Loan Bank of Des Moines.

**Public Housing Condition**

Public Housing Development	Average Inspection Score
Scattered	96b

**Table 38 - Public Housing Condition**

**Describe the restoration and revitalization needs of public housing units in the jurisdiction:**

The PHA’s 5-Year Capital Plan identifies how the PHA will renovate/modernize public housing units (using HUD Capital Fund Program (CFP) grants). The emphasis is on improvements for life safety and residents’ quality of life. The PHA plans to start rehabilitation of the PHA’s Central Duplex development, including roofing replacement, window replacement, exterior repairs, kitchen and bathroom modernization, new flooring and doors, plumbing upgrades, unit painting, concrete sidewalk replacements, landscaping and playground improvements. Staff plan to perform the Central Duplex Modernization work in multiple phases using a portion of each future CFP grant until all the work is complete.

The PHA also plans to continue to complete capital improvements at scattered site during unit vacancy. These projects vary based on the individual needs of the property and include things like kitchen and bathroom remodels, electrical and plumbing upgrades, and the replacement of flooring, siding, windows, roofs, retaining walls, driveways, and furnace/boilers replacements.

The PHA has maintained its High Performer status under HUD’s Public Housing Assessment System (PHAS) for 32 consecutive years.

As stated above, the Saint Paul PHA has converted most of its public housing units with traditional Capital Fund subsidies and Operating Fund subsidies to a long-term contract with HUD under the Project-Based Rental Assistance (PBRA) program.

**Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:**

- Saint Paul PHA promotes fire safety and life safety as well as preserving the asset of public housing facilities. Saint Paul PHA maintains high quality and timely design, bidding and construction utilizing “green and sustainable” principles to conserve energy and water while protecting the environment to the greatest possible.

Furthermore, as part of its Capital Fund Program (CFP) Action Plan, Saint Paul PHA consults with its staff, residents, PHA Resident Advisory Board, PHA’s Hi-Rise President’s Council, and individual Resident Councils to inform them how Saint Paul PHA is using its Capital Fund Program funds; seek their input for future grant applications; and provide updates on ongoing and upcoming CFP work.

**Discussion:**

**Public Housing:** The Saint Paul PHA owns and manages a total of 4,273 units comprised of 2,553 hi-rise units (including 19 special purposes units that house police officers or support services offices) and 1,720 family units (both now in Project-Based Rental Assistance/PBRA), and 418 scattered site single family houses and duplexes (still public housing). As explained below, 3,836 former public housing units were converted to PBRA via HUD’s Rental Assistance Demonstration (RAD) effective January 1, 2020.

The PHA’s rental units are consistently fully occupied (over 99%). Saint Paul PHA has maintained its “High Performer” status under HUD’s Public Housing Assessment System (PHAS) for 29 consecutive years. Saint Paul PHA manages its properties to the high standards, including thorough and uniform applicant eligibility determination, fair lease enforcement, regular preventative maintenance, prompt response to maintenance work orders, full occupancy and timely turnover of vacant units, timely and accurate reporting of financial data, and all other components of quality property management and maintenance.

Saint Paul PHA follows its Five-Year Action Plan and an annual plan to use its HUD Capital Fund Program (CFP) grants, approximately \$11 million annually prior to the RAD conversion, to maintain and to renovate its family and hi-rise apartments. Similar work will continue in the PBRA buildings and units using Housing Assistance Payment (HAP) funding. The work includes creating new hi-rise community rooms and kitchens, and enlarging community centers on PHA family housing developments.

Still, it is important to note that Saint Paul PHA needs stable federal funding to maintain its High Performer status. The PHA anticipates that the PBRA-HAP funding will provide that stability and predictability, that was lacking in public housing.

**Publicly-Assisted Affordable Housing:** For non-Saint Paul PHA housing, the City provides financing for the preservation, renovation, or new construction of rental housing affordable at or below 60% of area median income – using a combination of financing, including low-income housing tax credits, federal funds including CDBG and HOME, state housing dollars, City TIF, and other City funds. Still, with limited

financial capacity, the City must partner with HUD, Minnesota Housing Finance Agency, and private foundations to finance affordable housing developments.

It should also be noted that the City needs stable federal funding, such as CDBG and HOME, to construct and preserve affordable housing in Saint Paul.

**MA-30 Homeless Facilities and Services – 91.210(c)**

**Introduction**

**Facilities and Housing Targeted to Homeless Households**

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	439	NO DATA	278	828	NO DATA
Households with Only Adults	204	NO DATA	292	849	NO DATA
Chronically Homeless Households	NO DATA	NO DATA	NO DATA	NO DATA	NO DATA
Veterans	NO DATA	NO DATA	NO DATA	NO DATA	NO DATA
Unaccompanied Youth	15	NO DATA	21	0	NO DATA

**Table 39 - Facilities and Housing Targeted to Homeless Households**

**Data Source:** Ramsey County Housing Inventory Count (HIC), MN HMIS

**Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons**

To ensure full range of services, without duplication, Saint Paul has a coalition of community services including HousingLink, Ramsey County Family Homelessness Prevention Assistance Program Advisory Committee, Ramsey County Continuum of Care (CoC), and affordable supportive housing providers. The City of Saint Paul, in partnership with Ramsey County is launching the new “Familiar Faces” Programming to further coordination along with the City’s Homeless Assistance Response Team.

**Short Term Emergency Financial Assistance for rent, utility payments or other emergencies which threaten the loss of housing:**

Agencies/Programs include: City of Saint Paul planning underway for new emergency rental assistance, Ramsey County Social Services, St. Paul Foundation – Community Sharing Fund, City of Saint Paul Mortgage Foreclosure Prevention Program, Sewer Abatement fund, Community Action Programs –utility assistance, Salvation Army Heat Share, HouseCalls, United Way.

**Homelessness Prevention Programs that assist households secure and maintain housing:**

Agencies/Programs include: Saint Paul Public Library Outreach, Saint Paul Home Rehab Loan Programs, Dispute Resolution Center, Southern Minnesota Regional Legal Services (SMRLS) legal representation (tenant/rights, fair housing, emergency assistance).

**Homelessness Prevention Services that address basic needs:**

Food: Community Food pantries, CAP-utility assistance, free meals at Saint Paul Opportunity Center, Neighborhood House and faith communities.

Health Care: Health service programs include Community Clinics in Saint Paul such as Minnesota Community Care (formerly West Side Community Health Services), Open Cities Health Center, United Family Medicine, and Family Tree Clinic. These facilities can provide primary and preventative care, mental health services, and dental services to people who experience barriers to care, including those who experience homelessness. Programs through these clinics also include health screenings at the City’s emergency shelters. AIDS and STD testing and treatment are provided by area organizations, including Family Tree Clinic, Face to Face Clinic, JustUs Health, and Saint Paul - Ramsey County Public Health. Health Care for the Homeless provides medical services to homeless residents. Saint Catherine University Master of Nursing-Entry Level Nursing students conduct supervised in-home services to residents of the YWCA Saint Paul’s transitional housing program.

Furniture Programs: Goodwill, St. Vincent de Paul, Disabled Americans, Bridging.

Personal Care: Showers and laundry services at Saint Paul Opportunity Center and Health Care for the Homeless.

Job and Employment Training: Ramsey County Workforce Solutions, City's Right Track summer youth program, Goodwill Industries (employment and training).

Educational: Saint Paul Public Schools Title 1 partners with many community agencies to ensure that homeless students are transported to their school of origin. Additionally, Title 1 provides some tutoring and related educational services to children living in transitional housing.

Mental Health Services: Ramsey County Community Services, RADIAS Health (formerly South Metro Human Services), MN Department of Human Services, Adult Rehabilitative Mental Health Services (ARMHS).

**List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.**

**Homeless Adults:** There is a constant need for emergency shelter beds for homeless individuals as well as supportive services, including permanent supportive housing opportunities and medical respite.

The City and Ramsey County currently partners with 3 single adult shelter providers (Catholic Charities, Higher Ground Shelter, Model Cities, Safe Space Shelter, and Union Gospel Mission. Ramsey County partners with 2 family shelter providers (Catholic Charities, Family Service Center and Beacon Interfaith, Provincial House. Shelter Capacity is typically full and as a result unsheltered homelessness is increasing in Ramsey County. Ramsey County CoC is working to strengthen service delivery offered at traditional homeless service shelters and day centers and offer new programs such as Familiar Faces. The Familiar Faces program will serve individuals who are frequent utilizers of emergency response and who have not been served well in traditional emergency response settings. Familiar Faces will provide personalized, intensive support and service connection to address the unique needs of everyone within the "Familiar Faces" group.

**Homeless Families:** There is a constant need for emergency shelter beds for homeless families in addition to transitional housing, permanent supportive housing, and domestic violence facilities. Wilder Research (*Homelessness in Minnesota - 2015 results*, November 2016) reports that almost half of all homeless children are age 5 or younger and 78% of homeless families with children are single parent-headed households. Family homelessness is often considered to be caused by a shortage of affordable rental housing and by poverty. The federal monthly Temporary Assistance to Needy Families (TANF), implemented locally as the Minnesota Family Investment Program (MFIP), cash allowances have not increased since 1986 and are insufficient to pay for a modest apartment. Homeless families often are

more vulnerable due to the lack of job skills and employment, domestic violence, and mental health issues and often require a continuum of services provided in a structured, supportive setting.

The City, working in collaboration with Ramsey County, allocates ESG funds to various organizations, such as Catholic Charities - Family Service Center, the YWCA transitional housing, and the YWCA rapid re-housing for families. Theresa Living Center transitional housing also assists single women and single-parent families, and Lutheran Social Services Life Haven provides transitional housing for teenaged parents. In addition, the City has provided capital funding to Casa Guadalupana for building improvements, and is currently working with YWCA St. Paul to fund capital improvements for transitional housing for families.

**Homeless Youth:** There is a constant need for culturally-sensitive and age-appropriate emergency shelter beds for homeless youth. Wilder Research Center and homeless youth service providers recognize that official numbers of homeless youth significantly under-represent the total number of youths who are experiencing homelessness since homeless youth often “couch-hop” or stay temporarily with an acquaintance or relative. This is partly due to the lack of youth-specific shelters and housing programs.

The City allocates ESG funds to Lutheran Social Services Safe House (emergency youth shelter), Salvation Army Booth Brown House (emergency youth shelter), and Face to Face *Safe Zone* (drop-in center and rapid re-housing services for homeless youth).



## MA-35 Special Needs Facilities and Services – 91.210(d)

### Introduction

This section discusses the special needs facilities and services for Saint Paul residents who are not homeless but require supportive housing or support services. Within the city, many families and individuals struggle with multiple barriers to secure and maintain housing. Consequently, these residents are more likely to have lower incomes, have difficulty paying housing and utility costs, or have individual concerns that require special needs facilities and enhanced community services. The groups discussed in this section are:

- Elderly
- Frail Elderly
- Persons with Physical Challenges
- Persons with Developmental Challenges
- Persons with Mental Health Challenges
- Persons with Chemical Dependency Issues, such as alcohol or other drug addictions
- Persons with HIV/AIDS and their families
- Public Housing residents

**Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs**

Saint Paul elderly and frail elderly residents need accessible design modifications and supportive services to support independent living, especially when elderly residents may place significant demands on both institutional and community-based long-term care services. Legislative directives (Olmstead decision) require that special needs residents seek independent living arrangements. Thus, there is a need for affordable housing with support services, including affordable accessible-designed housing for physically challenged residents, supportive housing programs for persons with mental health challenges, and sober housing and safe haven "Housing First" programs for chronically-inebriated. In Saint Paul, there are a wide variety of housing options ranging from independent living and housing with support services, such as, but not limited to:

- **Independent living** (housing with support services).
- **City's Home Rehab Programs** (home improvements, energy conservation, accessibility).

- **Minnesota Homeownership Center’s (MNHOC) Mortgage Counseling** (explains reverse mortgages).
- **Affordable Rental Housing** (publicly-assisted affordable housing).
- **ADA-designed housing** (accessible units in compliance with ADA).
- **Saint Paul PHA's Assisted Living Programs** (PHA-Congregate Housing Services and PHA/Wilder Assisted Living Program that assist frail or disabled residents at risk of nursing home placement). Payment is made by client reimbursement, Alternative Care, Elderly Waiver funds and/or Minnesota Supplemental Assistance.
- **PHA /Accessible Space New Beginnings - Brain Injury Program** (24-hour personal care attendant service and support services for residents who sustained brain injuries).
- **PHA /Accessible Space, Inc.** (housing with 24-hour personal care attendant service and support services for residents with mobility impairments and/or complications from diabetes).
- **HUD Section 811 Program** (service-enriched housing for older adults and physically-challenged residents so they can live more independently).
- **Congregate living facilities and assisted living facilities** (private market and affordable congregate living facilities-service-enriched housing for older adults and younger disabled persons).
- **Nursing facilities** (long-term care facilities providing nursing services, rehabilitative care and assistance meeting daily living needs of individuals with physical disabilities).
- **State of Minnesota Home and Community-Based Services (HCBS) waiver programs** (environmental modifications and housing placement assistance).
- **Case management services** (Ramsey County Social Services provides case management services to residents with developmental disabilities, residents with chemical dependency, residents with mental health challenges).
- **ARC Minnesota** (services to persons with developmental disabilities).
- **CBDG-funded Block Nurse Program**

### **Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing**

The City of Saint Paul is launching its new Familiar Faces programming, which focuses on providing shelter and services for those cycling in and out of institutional settings. Ramsey County Social Services provides supportive services to individuals with mental illness. For residents leaving mental health treatment facilities, there are some housing subsidies being administered by the County with its partners, including RADIAS Health (formerly South Metro Human Services), Mental Health Resources, and Guild, Inc. Ramsey County Continuum of Care works closely with County staff and State Department of Human Services to ensure that there are housing solutions in place before a resident is discharged from a mental health treatment facility. Additionally, the Saint Paul Opportunity Center features partner

organizations, such as Catholic Charities, Ramsey County, and Minnesota Community Care, to provide physical, mental and chemical healthcare services, housing search and placement services, access to Veteran's benefits, SNAP, Medical Assistance, and other supports. The County also administers the state-funded Housing Support Program, which aims to reduce and prevent people from living in institutions or becoming homeless.

Extended Care facilities provide housing for individuals with mental illness who had multiple Rule 36 placements and need supportive services. Extended Care facilities enable clients to live independently in their own apartment while receiving supportive services and illness management support from the Rule 36. The level of service the individual receives under Rule 36 is based on each client's individual desires and needs.

**Bridges Rental Assistance Program:** Bridges, a statewide program, provides temporary rental assistance payments and security deposits paid directly to property owners on behalf of participants with serious and persistent mental illnesses who are on a waiting list for a permanent rent subsidy. Other eligible uses include utility deposits, contract rent for up to 90 days during a medical or psychiatric crisis, and payments to utility companies for up to 90 days during medical or psychiatric hospitalization.

**Crisis Housing Assistance:** The Minnesota Department of Human Services provides a flexible pool of money to provide short-term housing assistance to persons receiving in-patient psychiatric care. Persons must have a serious and persistent mental illness requiring less than 90 days of assistance and be able to retain their current housing.

**Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)**

Saint Paul 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. While Ramsey County is the primary provider of most social services, the City will continue to provide funding for public services, including supportive services that assist those with special needs. Additionally, the City finances multi-family affordable housing developments that must also comply with ADA requirements - which provides additional opportunities for persons with physical challenges. It is anticipated that the City will continue to do so during the next year. The City is also continuing to explore options for supportive housing with community agencies and may be working with private housing developers and non-profit housing developers to develop senior housing alternatives. Goals of this Consolidated Plan include Development of New Housing, which includes housing for special needs and Public Services, which includes supportive services.

**For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))**

Saint Paul 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. While Ramsey County is the primary provider of most social services, the City will continue to provide funding for public services, including supportive services that assist those with special needs. Additionally, the City finances multi-family affordable housing developments that must also comply with ADA requirements - which provides additional opportunities for persons with physical challenges. It is anticipated that the City will continue to do so during the next year. The City is also continuing to explore options for supportive housing with community agencies and may be working with private housing developers and non-profit housing developers to develop senior housing alternatives. Goals of this Consolidated Plan include Development of New Housing, which includes housing for special needs and Public Services, which includes supportive services.

## **MA-40 Barriers to Affordable Housing – 91.210(e)**

### **Negative Effects of Public Policies on Affordable Housing and Residential Investment**

Housing data for Saint Paul demonstrates that the greatest needs and highest housing priorities are affordability, choice, and supply. Consistent with the City’s 2040 Comprehensive Plan-Housing Chapter, affordable housing priorities include preservation and production of rental housing affordable for those at or below 30% of AMI; create homeownership opportunities for households with low and moderate incomes, 60-80% AMI; housing preservation for low-income elderly homeowners between 0-50% of AMI; provide housing for special needs populations.

The 2040 Comprehensive Plan supports affordable housing development and Policy H-32 states “Continue to use City/HRA resources to support affordable rental housing citywide with at least 30 percent of the total rental units (both market-rate and affordable) financially assisted by the City/HRA being affordable to households earning 60 percent or less of AMI with at least: 10% of all units being affordable to households earning 30% of AMI; 10% of all units being affordable to households earning 50% of AMI; and 10% of all units being affordable to households earning 60% of AMI.”

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 household 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 costs and lack of funding 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 and insufficient allocation of LIHTCs 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. The City’s LIHTC allocation also continues to shrink.

## MA-45 Non-Housing Community Development Assets – 91.215 (f)

### Introduction

This section discusses the non-housing community development assets and needs in terms of employment sectors and business activity, workforce and infrastructure needs, workforce training initiatives, and economic development initiatives. The City of Saint Paul works to support businesses that create jobs and ensure that city residents are competitive for those jobs. This work is funded with a combination of discretionary City dollars and state and federal funding, including CDBG funds for eligible activities.

### Economic Development Market Analysis

#### Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	389	73	0	0	0
Arts, Entertainment, Accommodations	16,582	17,355	13	12	-1
Construction	3,286	4,676	3	3	1
Education and Health Care Services	33,249	53,578	26	37	11
Finance, Insurance, and Real Estate	9,601	13,644	7	9	2
Information	2,795	3,402	2	2	0
Manufacturing	12,155	7,556	9	5	-4
Other Services	5,352	7,033	4	5	1
Professional, Scientific, Management Services	15,790	11,788	12	8	-4
Public Administration	0	0	0	0	0
Retail Trade	11,838	10,402	9	7	-2
Transportation and Warehousing	3,816	1,382	3	1	-2
Wholesale Trade	4,825	6,517	4	5	1
Total	119,678	137,406	--	--	--

**Table 40 - Business Activity**

**Data Source:** 2016-2020 ACS (Workers), 2020 Longitudinal Employer-Household Dynamics (Jobs)

## Labor Force

Total Population in the Civilian Labor Force	166,235
Civilian Employed Population 16 years and over	157,990
Unemployment Rate	4.97
Unemployment Rate for Ages 16-24	15.17
Unemployment Rate for Ages 25-65	3.38

**Table 41 - Labor Force**

Data Source: 2016-2020 ACS

Occupations by Sector	Number of People
Management, business and financial	43,570
Farming, fisheries and forestry occupations	6,820
Service	17,945
Sales and office	31,555
Construction, extraction, maintenance and repair	7,385
Production, transportation and material moving	7,710

**Table 42 – Occupations by Sector**

Data Source: 2016-2020 ACS

## Travel Time

Travel Time	Number	Percentage
< 30 Minutes	95,529	71%
30-59 Minutes	33,739	25%
60 or More Minutes	5,169	4%
Total	134,437	100%

**Table 43 - Travel Time**

Data Source: 2018-2022 ACS

## Education:

### Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	10,230	745	8,955
High school graduate (includes equivalency)	22,890	1,455	8,075



Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Some college or associate's degree	33,020	1,725	7,195
Bachelor's degree or higher	60,145	1,585	6,795

**Table 44 - Educational Attainment by Employment Status**

Data Source: 2016-2020 ACS

**Educational Attainment by Age**

	Age				
	18-24 yrs	25-34 yrs	35-44 yrs	45-65 yrs	65+ yrs
Less than 9th grade	460	2,206	3,189	4,473	3,680
9th to 12th grade, no diploma	2,920	1,670	2,116	2,207	883
High school graduate, GED, or alternative	7,781	9,143	8,561	15,311	8,890
Some college, no degree	13,860	6,719	8,337	9,879	8,188
Associate's degree	2,727	3,519	2,727	4,148	1,587
Bachelor's degree	5,284	19,390	8,721	15,792	8,409
Graduate or professional degree	376	8,483	10,733	13,696	7,969

**Table 45 - Educational Attainment by Age**

Data Source: 2018-2022 ACS

**Educational Attainment – Median Earnings in the Past 12 Months**

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	24,883
High school graduate (includes equivalency)	28,973
Some college or associate's degree	36,262
Bachelor's degree	50,134
Graduate or professional degree	67,921

**Table 46 – Median Earnings in the Past 12 Months**

Data Source: 2016-2020 ACS

**Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?**

The major employment sectors include Education and Health Care Services (employs 33,249 employees), Arts, Entertainment, Accommodations (employs 16,582 employees), Professional, Scientific, Management Services (employs 15,790 employees), Manufacturing (employs 12,155 employees) Retail Trade (employs 11,838) and Finance, Insurance and Real Estate (employs 9,601 employees).

**Describe the workforce and infrastructure needs of the business community:**

The reported 2016-2020 ACS unemployment rate of 4.97% is outdated. The State of Minnesota Department of Employment and Economic Development (DEED) reports an unemployment rate for 3.1% in October 2024. This low unemployment rate means that businesses in growing sectors are having difficulties attracting and retaining talent. In Saint Paul, this low unemployment rate also masks racial disparities in unemployment. According to the 2022 ACS 5-Year estimates, the City's overall unemployment was 5.0%, while the unemployment rate was 8.2% for the Black or African Americans population and 16.5% for the American Indian and Alaska native population.

These disparities persist. The Metropolitan Council has identified Areas of Concentrated Poverty (ACP50) – Census Tracts where at least half of the residents are people of color and at least 40% of the residents live below 185% of the federal poverty line – and has committed to using its public resources to catalyze investment in these areas. Saint Paul's ACP50 areas show a concentration of the highest percentages by Census Block Group of households without a car, families living in poverty, non-English speaking households, severely cost-burdened households, and population 25 years and older with no bachelor's degree. The ACP50 areas also exhibit the lowest high school graduation rates in Saint Paul. The City's 2040 Comprehensive Plan supports the equitable geographic allocation of public funding and investment (especially for land use, housing, transportation, community wealth creation, public utilities and parks) to ensure that residents in these areas have the resources they need to thrive and prosper.

The State of Minnesota Department of Employment and Economic Development (DEED) Regional Industry Employment Projections for the Twin Cities Planning Region (accessed in December 2024) projects the greatest industry employment growth from 2022 to 2032 to occur in Health Care & Social Assistance (9.2% growth), Professional Services & Management of Companies (9.1% growth), Wholesale Trade (7.8% growth), Transportation & Warehousing (7.7% growth), and Information (7.7% growth)

Challenges for many of these growing industries relate to the availability of talent, skills, and competencies demanded by employers in the changing economy and technology growth. Labor shortages and racial disparities in training/educational outcomes also remain a challenge for the region, which can impact the ability to grow the regional economy in an inclusive way, sharing the benefits of increased prosperity. Employers need to revise hiring practices and increase well-rounded and representative employment. While academic institutions and training partners need to undertake initiatives to support different learning models and ongoing skill building.

In 2017, the City of Saint Paul launched a tech sector growth initiative called Full Stack that uses City funds for scholarships to low-income residents to tech credentialing programs with high replacement rates and significant increases in hourly wages. In other employment sectors, the City works with Ramsey County and other partner organizations to provide employment and training services to businesses and job seekers.

Infrastructure needs of businesses also continue to grow more complex and infrastructure ages. The need for optic fiber and other high-speed access to the internet connections and data analysis will continue to put pressure on existing systems. Other infrastructure needs of businesses include transit expansion, roadway and utility upgrades to aging infrastructure, freight transportation, and land development to support job growth and creation. Plans are underway for transit lines serving Saint Paul and the surrounding metro area, connecting workers to jobs more efficiently.

**Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.**

The City supports initiatives to provide business assistance and develop strategies aimed at building an environment where more innovative businesses can locate, start up, and continue to grow. Ongoing initiatives include:

**Full Stack** – A public/private partnership co-led by the City and St. Paul Area Chamber of Commerce, provides services to help tech/innovation sector businesses start-up/scale up and attract, retain, and expand tech/innovation jobs. Workforce Innovation and Opportunity Act (WIOA) dollars granted to Ramsey County have supported scholarships and wrap-around services since 2019. The State of MN has provided grant funds to augment City and Federal dollars, and the City is pursuing foundation funds as well.

**Minimum Wage Ordinance** – Sets the lowest hourly pay rate for work done in Saint Paul. The minimum wage varies based on a business's size and increases in phases. The City will require businesses of all sizes to pay their employees a minimum wage of \$15 an hour by 2027.

**Open for Business** – A one-stop shop for start-up and existing businesses to get information and leverage resources to starting a business in Saint Paul; connection with information and resources to start, move or expand a business; and help from a Business Project Facilitator as a guide through the permitting and licensing process of opening, expanding or moving to the City.

**Commercial Corridor Pilot Fund** – The HRA is exploring a more flexible new grant fund to advance the economic well-being of the City of Saint Paul by supporting commercial corridors

citywide. The fund will build capacity at business-support organizations to enhance their commercial corridors by planning events, marketing and promotion, supporting individual business needs, and making infrastructure or streetscape improvements.

**How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?**

There is a need for a skilled and educated workforce in Saint Paul. There are eleven colleges and universities located within City boundaries, which are a strength of the region. However, despite very low unemployment rates overall in both Saint Paul and the region, unemployment rates are much higher and labor force participation rates are much lower for people of color. At the same time, employers have difficulty recruiting and retaining staff with the needed skills and job posting boards demonstrate tens of thousands of unfilled jobs at any given time.

The State of Minnesota Department of Employment and Economic Development (DEED) Twin Cities Planning Region Occupations in Demand data indicates a variety of in-demand occupations requiring different levels of education required, ranging from “less than high school” to “bachelor’s degree or higher”. However, many of the higher-income occupations require skills training and other educational programs. There is a general need to increase the number of people with bachelor’s degrees and two-year degrees (Associate’s and technical degrees) and skill credentialing programs.

**Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.**

Ramsey County is the lead agency that handles job training for Saint Paul. The City will continue to work with the County as its partner. The Workforce Innovation Board (WIB) of Ramsey County, a legislatively mandated Workforce Board that works to help maintain the economic health of Ramsey County, identifies current and emerging workforce issues and needs, creates partnerships to serve the needs of businesses and job seekers, and oversees publicly funded workforce programs in Ramsey County. Workforce services are offered by Ramsey County Workforce Solutions, the Minnesota Department of Employment and Economic Development (DEED), and a network of dedicated partner organizations. Workforce Solutions is overseen by the WIB and provides employment and training services to businesses and job seekers in Ramsey County. These efforts support the City’s Consolidated Plan by

providing thousands of Saint Paul residents with employment resources and job skill training. In 2023, Ramsey County Workforce Solutions provided service to 7,274 Saint Paul residents.

Other workforce training opportunities and business development services are available through Full Stack Saint Paul, Construction Careers Foundation, YWCA Saint Paul, Latino Economic Development Center, Neighborhood Development Center, local Chambers of Commerce and Trade Associations, as well as other community organizations and community colleges.

**Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?**

No.

**If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.**

While not a CEDS, the goals identified in the 2040 Comprehensive Plan that focus on economic development includes efforts to improve the economic well-being and quality of life of a community by creating and/or retaining jobs and supporting or growing incomes and the tax base. In Saint Paul, economic development is a critical component of meeting our equity, diversity and growth goals, especially as we seek out innovative economic models for our culturally rich neighborhoods.

**Neighborhood STAR** - 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. Proposals can be for either a project or program that results in capital improvements in Saint Paul. Innovative proposals are encouraged. Eligible applicants include any public, private, nonprofit, or for-profit organization located in or doing business in Saint Paul. Neighborhood STAR is funded by Saint Paul's half-cent sales tax.

**Cultural STAR** - The Cultural STAR Program provides grants and loans to Saint Paul cultural projects and organizations. Most projects are located 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. The Cultural STAR Program is funded by Saint Paul's half-cent sales tax.

The four major goals of the Cultural STAR Program are:

- Build and diversify audiences
- Promote a broad range of cultural offerings
- Produce a long-term impact
- Leverage additional financial support

The City also supports other regional economic development initiatives which are coordinated with the Consolidated Plan. Greater MSP is a regional economic development effort that brings the regional planning focus on development. This effort takes as given that economic development in the region supports all the communities in the region. Thrive MSP is a vision for the Twin Cities region that includes strategies for creating regional economic competitiveness and promoting equity, which align with the City's priorities.

## **Discussion**

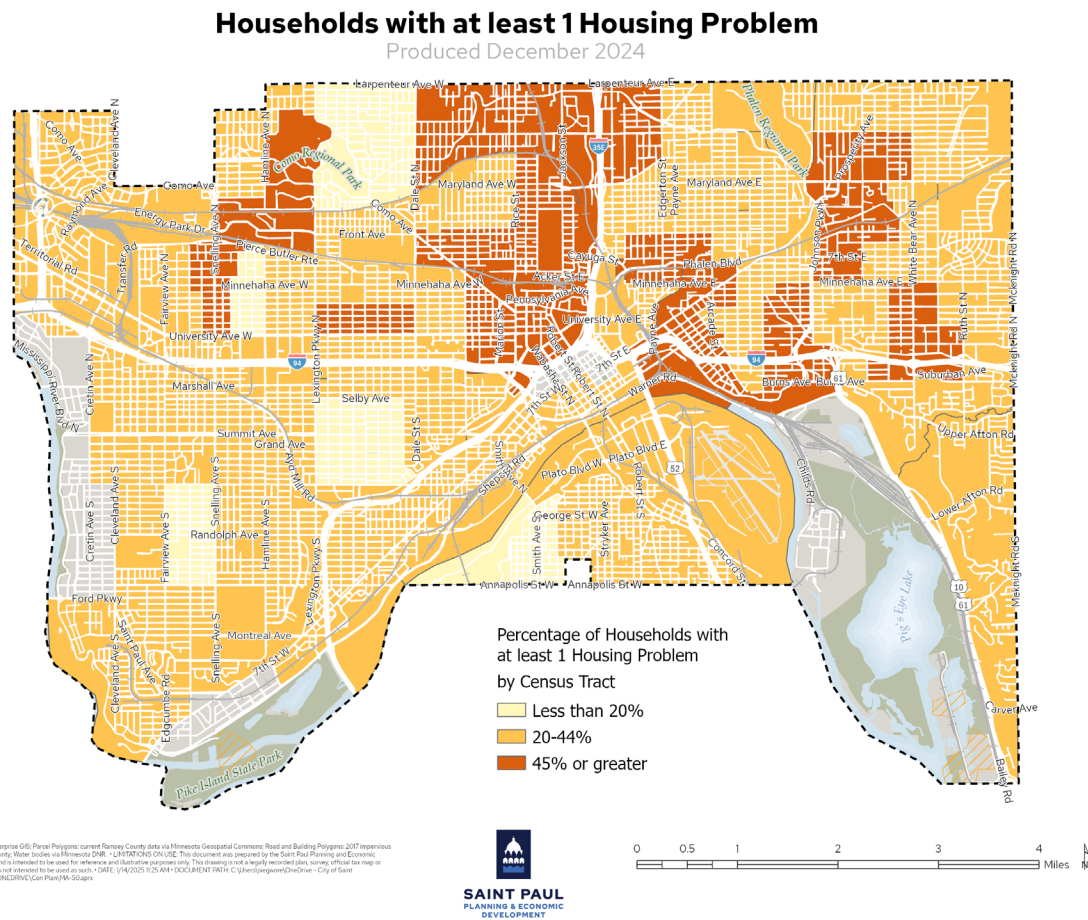
The City and its subgrantees have used CDBG funding to assist about 35 businesses over the last five years, and it is anticipated that we will continue to fund economic development activities over the next five years. Projects are carried out by series of subrecipients and the City's Planning and Economic Development department to provide small businesses funding for façade improvements, rehabilitation, and code correction. The activities help to retain and attract businesses to the city and create jobs for city residents. The businesses that are assisted with CDBG funding must either have a low/moderate income service area or create jobs for low/moderate income persons. CDBG dollars under the Public Service spending category are also invested in the City's youth workforce development internship program. The City also invests local dollars in commercial real estate development and business loans to support job creation and tax base growth and places a strong priority on investing City contracting dollars in doing business with certified Disadvantaged Business Enterprises. The State of Minnesota also provides loans and grants to support job growth.

# MA-50 Needs and Market Analysis Discussion

## Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

2017-2021 CHAS data includes location of households experiencing one or more housing problems (lacks kitchen or plumbing, more than one person per room, or cost burden greater than 30%). Shown in Map MA-50-1 below, there are areas in Saint Paul where concentrations of households with housing problems exist. These are census tracts where 45% or more households experience at least one housing problem, which are primarily located in the central northern part of the city, which includes along the northern segment of Interstate 35E (I-35E) in the North End and Payne-Phalen neighborhoods, portions of neighborhoods close to downtown including Dayton’s Bluff, Frogtown, and Summit-University neighborhoods, and pockets of Greater East Side, Battle Creek/Highwood Hills, Como Park, and Hamline-Midway near Snelling Avenue. Many of these parts of the city contain some of oldest housing stock and most affordable rents.

**Map MA-50-1: Households with at least 1 Housing Problem**



**Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")**

Shown in Map MA-50-2 below, there are areas in Saint Paul where concentrations of minorities and low-income households are located. These concentrations are in the central part of the city just outside of downtown, including the neighborhoods of Dayton's Bluff, West Side, Frogtown, and Summit-University, along the northern segment of I-35E in the North End and Payne-Phalen neighborhoods, the east side neighborhoods, along I-94 and Highway 10.

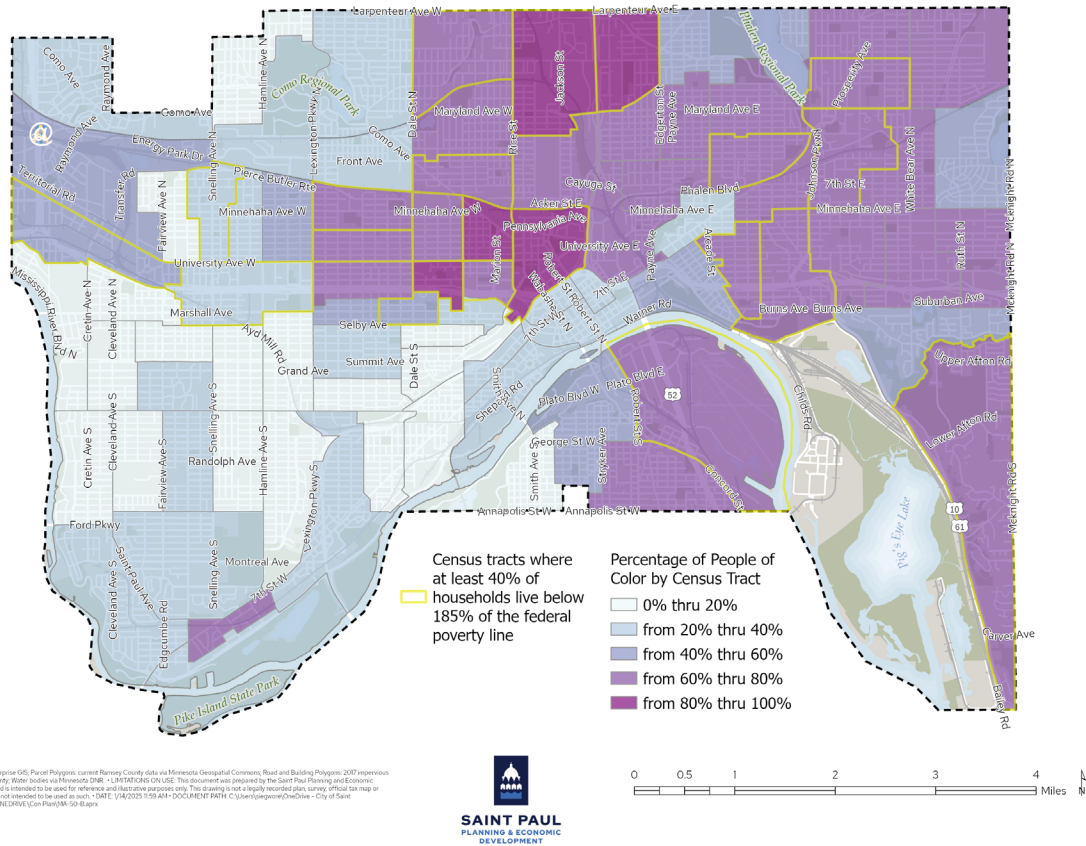
This map is informed by 2023 ACS 5-year data and indicates census tracts where at least 40% of the population has incomes below 185% of the federal poverty threshold and where at least 60% of the population is people of color. These areas also have the highest percentages by census tract of carless households, cost-burdened households, and population without a college degree, and track patterns of historic redlining and housing discrimination. Recent immigrants from countries from around the world over the last decade has followed this historic residential pattern for people of color and has contributed to the concentration of racial and ethnic communities. Furthermore, the lack of availability of lower cost housing in higher-income parts of the city has also contributed to the concentration.



**Map MA-50-2: Racial and Ethnic Minorities and Low-Income Census Tracts**

**Racial and Ethnic Minorities and Low-Income Census Tracts**

Developed in January 2025



**What are the characteristics of the market in these areas/neighborhoods?**

In general, these areas are locations where the most affordable housing options are available. Rents and home values are lower than other areas in the city. These are also areas of older homes that often suffer from deferred maintenance, absentee owners, and areas of disinvestment. Several of these areas are currently experiencing reinvestment, particularly in the areas adjacent to the Green Line, Allianz Field at University and Snelling, Metropolitan State University, and revitalizing commercial corridors, which are described in more detail below.

**Are there any community assets in these areas/neighborhoods?**

These areas benefit from a variety of investments in public transportation, housing, and other development. A major community asset for the neighborhoods along University Avenue is the Green

Line, Saint Paul's first light rail line that connects downtown Saint Paul to downtown Minneapolis, and the development that has occurred along the corridor as a result. United Village, guided by the Snelling Midway Redevelopment Site Master Plan, is also a community asset with Allianz Field, the Minnesota United FC Major League Soccer Stadium, inclusive playground, 'The Calling' sculpture, and planned future development at University Avenue and Snelling Avenue. Additional community assets in these areas include the Rice Street commercial corridor and the Trout Brook Nature Sanctuary for the North End neighborhood, Phalen Creek, Lake Phalen, Phalen Village, and the Payne Avenue corridor for the Payne-Phalen and Greater East Side neighborhoods, Swede Hollow Park, the Bruce Vento Nature Sanctuary, and East 7<sup>th</sup> Street corridor for the Dayton's Bluff neighborhood, White Bear Avenue corridor for the Greater East Side neighborhood, and Battle Creek Regional Park and Sun Ray Shopping Center for the Battle Creek/Highwood Hills neighborhood.

### **Are there other strategic opportunities in any of these areas?**

Many of these areas are designated as Opportunity Zones by the City of Saint Paul Department of Planning and Economic Development. Through the Tax Cuts and Jobs Act of 2017, Congress incentivized investment in lower-income areas through the Opportunity Zones program. The program provides tax relief for investors who re-invest their unrealized capital gains into specific low-income communities. By providing tax breaks to investors, the program attracts investment dollars into low-income communities. The City works in partnership with Opportunity Funds, developers, investors, and the community to leverage capital gains equity and other investments in projects that meet City and community values.

Like the Cultural Destination Areas, Opportunity Zones are full of community assets that present strategic opportunities for redevelopment. In the St. Anthony Park Neighborhood, the Creative Enterprise Zone is an emerging mixed-use neighborhood with creative and industrial uses and the Frogtown and Summit-University neighborhood includes the Green Line East Focus Area that is poised for growth and investment to reflect the diverse culture of the area's residents. The North End neighborhood includes the North End Nexus Focus Area, an area that provides opportunities for coordinated redevelopment with Roseville and Maplewood in the area surrounding the intersection of Rice Street and Larpenteur Avenue and redevelopment of vacant or underutilized industrial sites. The Rice-Larpenteur Vision Plan provides a strategy to manage future growth of the area surrounding that intersection. The Dayton's Bluff and Greater East Side neighborhoods includes the Phalen Corridor Focus Area, which has seen significant revitalization, while presenting additional opportunities for redevelopment, especially at the East 7th and Arcade business district. The Gold Line East Opportunity Zone in the heart of the city's East Side and is planned for denser development in tandem with the Gold Line Bus Rapid Transit (BRT) line connecting Saint Paul and the eastern suburbs along I-94. The West Side neighborhood contains City Center and Riverfront Focus Area, which includes the West Side Flats area adjacent to the Mississippi River and home to the city's riverfront esplanade. The West Side Flats Master Plan and Development Guidelines set a framework for reinvestment in the West Side neighborhood that includes sites for new housing and job opportunities.

In addition, leveraging planned and future transit improvements within these neighborhoods to help spark reinvestment and provide connection to residents and jobs is a key strategic opportunity. Many transit investments are planned outside of the associated neighborhoods around the Green Line. Slated to open in 2025, the Gold Line BRT has stations in the Dayton's Bluff and Battle Creek/Highwood Hills neighborhoods and is expected to help drive transformations in the land use and market conditions nearby. The Purple Line BRT is a proposed transit line between downtown Saint Paul and Maplewood, with stations locations in the Payne-Phalen neighborhood and near Dayton's Bluff and being evaluated in the Greater East Side neighborhood.

## **MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)**

### **Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.**

According to the State of Minnesota Office of Broadband Development, broadband refers to Internet connections that can transfer data and information (like web pages) at high speeds. Broadband service is delivered through the fiber and coaxial networks of cable providers; DSL service over the telephone network; optical fiber to the home or business; mobile and fixed wireless systems; and satellite connections. Broadband plays a vital role in connecting people to employment, health care, education, and the global economy.

According to State of Minnesota Office of Broadband Development 2019 data, 99.98% of Ramsey County households have broadband availability or access to at least 100Mbps download/20Mbps upload speeds. Statewide, this percentage is 88.03%. The Office of Broadband Development also provides data on underserved broadband service areas (defined as having wireline broadband of at least 25Mbps download and 3Mbps upload but less than 100Mbps download and 20Mbps upload) and unserved broadband service areas which is defined as having broadband service of at least 25Mbps download and 3Mbps upload and via a wired connection. As shown in Map MA-60-1, there are few areas in Saint Paul that are unserved and underserved in terms of wired access to broadband. While some of these areas lie within areas in which 50% of households have incomes below 60% of the Area Median Gross Income (AMGI) or census tracts that have a poverty rate of 25% or more, most are not developable residential land apart from the Highland Bridge development site, which is currently being developed as a mixed-use community.

While Saint Paul is well connected regarding access to wired connectivity infrastructure, other barriers exist, including the cost of internet service and devices and digital literacy. Many Saint Paul households are unable to afford the cost of internet service as well as the devices, including a modem and computer, tablet, or smart phone required to access the service. In addition, many households lack digital literacy about how to connect to broadband and use a computer and/or the importance of broadband in staying connecting to family and friends, employment, health care, education, and the global economy.

There are organizations that are working towards reducing barriers to broadband connectivity by providing low-cost internet and computers to low-income households. PCs for People is a non-profit organization with a mission to offer affordable technology to provide a bridge across the digital divide that offers employment and educational opportunities to low-income individuals and non-profits. PCs for People offers low-cost computers and nationwide high-speed LTE internet service for households

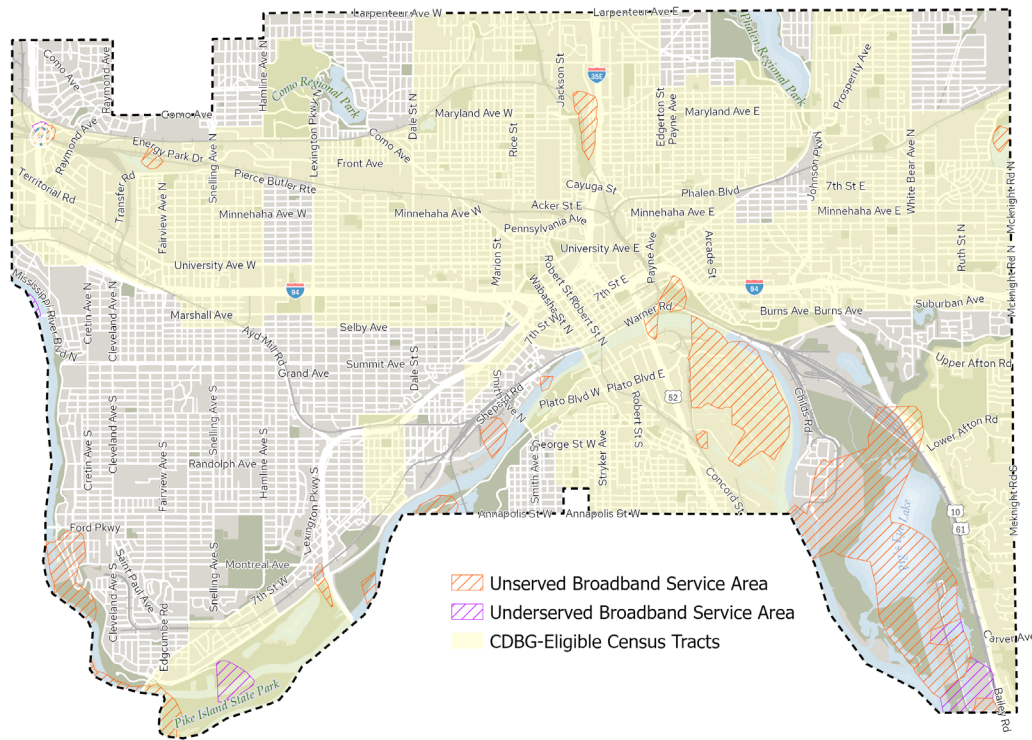
under 200% of the federal poverty level, 60% of area median income, or enrolled in an income-based government assistance program. Comcast’s Internet Essentials Program offers low-cost computers and affordable home internet to households that are eligible for public assistance programs such as the National School Lunch Program, Housing Assistance, Medicaid, SNAP, SSI, and others, and they recently lowered those eligibility requirements to reach a greater number of people. Saint Paul Public Libraries and other community organizations offer computer classes and technology help, as well as a mobile internet bus that can visit residents in needed areas of the city.

In addition, Saint Paul Public Libraries provide free wireless internet access and public internet computers that do not require a library card to use at all Library locations, as well as trained staff to provide computer assistance and classes. Saint Paul residents can also check out a wireless internet hotspot for free, high-speed Internet service.

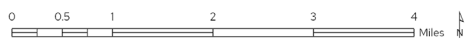
**Map MA-60-1: Unserved and Underserved Broadband Service Area**

### Unserved and Underserved Broadband Areas

Developed in January 2025



DATA CREDITS: St. Paul Enterprise GIS Parcel Polygons current Ramsey County data via Minnesota Geospatial Commons, Road and Building Polygons 2017 Impervious Surface dataset, Ramsey County, Water Bodies via Minnesota DNR - LULU/ROD/CR/USG. This document was prepared by the Saint Paul Planning and Economic Development Department and is intended to be used for reference and illustrative purposes only. This drawing is not a legally recorded plan, survey, official tax map or engineering schematic and is not intended to be used as such. DATE: 1/14/2025 10:22:09 AM | SOURCE: N/A | FILE: C:\Users\jgordon\OneDrive - City of Saint Paul\Documents\GIS PROJ ONE DRIVE\Cen Plan\MA-60 Broadband.aprx



**Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.**

According to the Office of Broadband Development, there are eight broadband providers in Saint Paul that provide at least 100Mbps download/20Mbps upload speeds. There are a variety of providers that offer fiber, fixed wireless, cable, and DSL. The largest providers for the city are Comcast Xfinity and CenturyLink. Increased competition can lead to lower service costs for customers.

## **MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)**

### **Describe the jurisdiction's increased natural hazard risks associated with climate change.**

The City of Saint Paul has been experiencing climate change for many years and increased natural hazard risks as a result. Building on decades of Saint Paul's framework for community resilience, the City developed a Climate Action & Resilience Draft Plan (CARP), which focuses on achieving carbon neutrality in city operations by 2030, and citywide by 2050 with a suite of targets and actions to decrease emissions across every sector in the city. It also identifies ways to cultivate long-term resilience, enhance the natural infrastructure of the city, and promotes a vision for Saint Paul's future with diminished threats of climate change.

The CARP references a report from the Interagency Climate Adaptation Team prepared by the Minnesota Pollution Control Agency, which identifies warmer summers and winters and more frequent and intense weather events as the hallmarks of climate change in Saint Paul, which can impact health, livability, landscape, and the environment. The report states that the frequency and severity of extreme cold conditions are declining rapidly, adding that the heaviest snowstorms have also become larger even as winter has warmed. Heavy downpours in Minnesota are now twice as frequent as they were a hundred years ago, and scientists expect events like these to become an increasingly common part of our daily lives.

In April of 2016, Saint Paul-Ramsey County Public Health developed a climate change vulnerability assessment, which identified populations and geographic areas that may be particularly vulnerable to climate hazards. As documented in the CARP, the climate hazards likely to impact Saint Paul are:

**Extreme Heat Events:** Heatwaves are expected to become more common by the middle of the 21st century. Extreme heat will be exacerbated in urban areas where impervious pavement and limited vegetation result in the urban heat island effect.

**Poor Air Quality:** Air pollutants, such as ozone, particulate matter, and allergens pose acute and chronic respiratory and cardiovascular threats. Rising temperatures and changes in precipitation patterns may lead to increased air pollution. Increased frequency of wildfires in the western United States and Canada have also impacted local air quality.

**Changes in Precipitation:** Increased precipitation has already been observed in Minnesota and is likely to increase into the future. This increase occurs in all seasons, but spring and summer are becoming wetter at a faster rate than fall and winter. Changes in precipitation patterns will likely lead to more river and flash flooding.

**Ecological Changes:** Vector-borne disease transmission is expected to increase due to changes in the distributions of ticks, mosquitoes, and other insect vectors because of warming temperatures and

changing precipitation patterns. Diseases include West Nile Virus, Lyme disease, and human anaplasmosis. The urban forest is directly impacted by invasive species like Emerald Ash Borer, that can lead to changes in the canopy and reduce the benefits that a healthy forest provides.

In 2019, the City updated the All-Hazard Mitigation Plan which addresses how to mitigate against hazards such as dam/levee/floodwall failure, damaging winds/thunderstorms, drought, extremely heat/cold, flood, human infectious disease, landslide/slope failure, severe winters storm, tornado, urban fire/wildfire. Hazard mitigation planning ultimately helps to protect Saint Paul residents. By working with city, county, state, and federal departments and agencies, we can identify vulnerabilities and develop strategies to reduce or eliminate the effects of a potential hazard.

**Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.**

A natural hazard due to climate change that may impact housing occupied by low- and moderate-income households is flooding. The risk of flash flooding varies across Saint Paul and is influenced by topography, watershed, and land use. Areas that are more susceptible to flash flooding tend to be low-lying with high levels of impervious surfaces, like roads and parking lots. Areas with greater biomass and vegetation coverage, as well as higher elevation, are at a relatively lower risk.

Saint Paul has a long history of flood events. Based on historical occurrences, federal disaster declarations, and analysis of impacts and consequences, flooding is one of the most frequent and costliest natural hazards impacting Saint Paul. With the availability of flood mitigation assistance in recent years, large tracts of the flood-prone riverfront have been mitigated by relocating structures from repetitively flooded areas and converting areas to permanent open space and recreational sites. Saint Paul faces risks and vulnerabilities associated these heavy precipitation events that will continue to increase in frequency and duration as the climate changes. Although Saint Paul's previous flood mitigation projects have reduced the impacts of flooding along the Mississippi River, the area's topography continues to make it prone to flooding and flash flooding during significant rain events.

Floods often cause damage to homes and businesses if they are placed in natural flood plains of rivers. Floods can result in partial or complete loss of facilities. Most property losses occur to residential structures, which would cause an economic hardship for people who do not have flood insurance. Flooding events may also result in a temporary loss of power and/or phone service lasting from a few hours to several days. Results of these impacts often complicate communications with responders, which could affect availability of personnel and the ability to continue operations at acceptable levels.

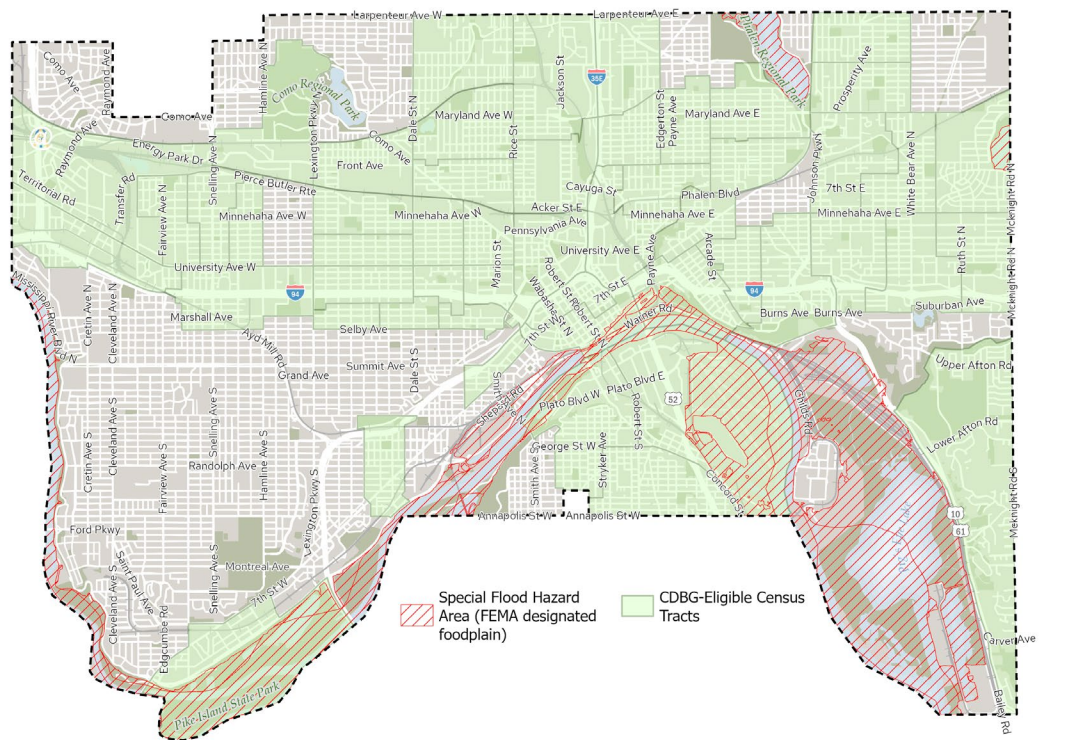
People and buildings located in or near a floodplain are at the greatest risk, and although there is still a risk, people and businesses located outside of a floodplain are at a lower risk. The density of downtown is a vulnerable aspect in the event of a major flooding event for both residents, visitors, and responders



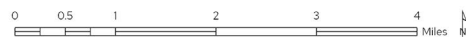
as flooding is dangerous to navigate in and around. Vulnerable populations identified by the City include people who speak limited English, the elderly, lower socioeconomic status, disabled (physical and mental) and people who do not have access to traditional methods of communication to receive warnings (i.e., no TV, radios or internet; or are vision or hearing impaired).

The City has conducted modeling on historic flooding events and continues to monitor the risk of flooding by evaluating and understanding infrastructure. Based on this analysis, Saint Paul’s highest risk areas for flooding are those near the Mississippi River, particularly in the FEMA designated floodplain which includes areas like Lowertown, Childs Road, Barge Channel Road, and Harriet Island. The Capitol Region Watershed District additionally delineated inundation area adjacent to Trout Brook Interceptor and Como Golf Course. Outside of these areas, risk of flooding in Saint Paul is largely dependent on circumstances. As shown in Map MA-65-1 below, some of the areas of highest risk to flooding (Special Flood Hazard Areas designated by FEMA) are also areas occupied with CDBG-eligible census tracts (with at least 51% low/moderate income persons). However, most of these areas are industrial or park land, and there are very few residential properties located within the floodplain.

### Flood Hazard Areas Produced January 2025



DATA CREDITS: St. Paul Enterprise GIS; Parcel Polygons current Ramsey County data via Minnesota Geospatial Commons; Road and Building Polygons: 2017 Impervious surface dataset, Ramsey County, State; bodies via Minnesota DNR - LIMITATIONS ON USE: This document was prepared by the Saint Paul Planning and Economic Development Department and is intended to be used for reference and illustrative purposes only. The mapping is not a legally recorded plan, survey, official engineering schematic and is not intended to be used as such. DATE: 1/14/2025 1:07 AM - DOCUMENT PATH: C:\Users\jgasper\OneDrive - City of Saint Paul\Documents\GIS PROJ ONE\DWG\Cen Plan\Map 65.gxd



# Strategic Plan

## SP-05 Overview

### Strategic Plan Overview

Saint Paul is an older, fully developed city with infrastructure, housing, and commercial properties that are in constant need of repair and replacement. As described in the needs assessment, the City also has several other housing and community development needs for its residents. The process of prioritizing these improvements, addressing needs, and allocating scarce resources is a difficult task. The City utilizes plans, policies, and resident and organizational input to help make these decisions. The priorities reflect the needs of the entire City and assume that all funding sources, including HUD funding, will not change significantly over the next five years. The City will undertake a variety of strategies to address its priority needs:

- Continue to provide community services through an institutional delivery structure based on strong partnerships among public, private, and non-profit partners. The City, Ramsey County, and community service agencies work together to use community-wide gaps analysis to assess needs and provide comprehensive services to assist unhoused residents and residents with special needs.
- Address barriers to affordable housing through city policies and initiatives, including creating and preserving housing that is affordable at all income levels; addressing racial, social and economic disparities in housing; creating infrastructure needed to stabilize housing; funding an Affordable Housing Trust Fund; and funding down payment assistance for first-time homebuyers. Recent zoning changes will also allow more creative housing density on existing residential lots, like ADUs.
- Address homelessness by working with Ramsey County and the Ramsey County CoC to ensure that comprehensive homelessness prevention and rapid rehousing services can be provided to all people experiencing homelessness. The City and County work to provide funding support to emergency shelters, transitional housing services, street outreach to residents experiencing homelessness, homelessness prevention resources, and rapid re-housing programs that support the needs of residents experiencing homelessness or those at risk of becoming homeless. Saint Paul non-profit organizations and service providers maintain community outreach, drop-in centers, meals, and other direct services to reach out to residents experiencing homelessness and those at-risk of becoming homeless. In addition, Ramsey County provides programs and counseling to previously institutionalized or homeless residents through partnerships with non-profit service providers to aid in the transition to permanent housing, and the City has provided financing for supportive housing facilities citywide.
- Address lead-based paint hazards by complying 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.

- Work towards reducing poverty by implementing programs and policies with a goal of reducing the number of families living in poverty, funding youth workforce activities and public services, and working with partners such as Ramsey County and community organizations to carry out programs that aid businesses and create jobs for low/moderate income persons.

## SP-10 Geographic Priorities – 91.215 (a)(1)

### Geographic Area

Table 47 - Geographic Priority Areas

Area Name:	Citywide
Area Type:	Other
Other Target Area Description:	Other
HUD Approval Date:	
% of Low/ Mod:	
Revital Type:	
Other Revital Description:	
Identify the neighborhood boundaries for this target area.	
Include specific housing and commercial characteristics of this target area.	
How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	
Identify the needs in this target area.	
What are the opportunities for improvement in this target area?	
Are there barriers to improvement in this target area?	

### General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

Investments are allocated city-wide based on needs. The highest-need areas are identified on the attached map image that shows the CDBG-qualified areas, where at least 51% of persons are low/moderate income persons. The City has a strong focus on racial and social equity and reducing disparities. The City’s Comprehensive plan prioritizes a wide distribution of opportunities in education, employment, housing, health and safety, and creating opportunities for all residents to achieve their highest potential. The Comprehensive Plan also includes policies about public investments:

- Policy H-56. Improve the stability and health of communities of concentrated disadvantage by implementing placed-based investments, such as public infrastructure, improvements and maintenance.

- Policy LU-3. Prioritize public investments in areas of concentrated poverty as defined by the Metropolitan Council.

## SP-25 Priority Needs - 91.215(a)(2)

### Priority Needs

1	<b>Priority Need Name</b>	Preservation of existing affordable housing
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate
	<b>Geographic Areas Affected</b>	Other
	<b>Associated Goals</b>	Rental Housing Rehabilitation
	<b>Description</b>	Working with public- and private-sector affordable housing providers to preserve existing, contractually obligated, affordable housing that is set to expire between 2025 and 2030; providing housing rehabilitation assistance for existing affordable housing units.
	<b>Basis for Relative Priority</b>	It is one of the City's top housing priorities to preserve affordability in existing units. About 88% of the residential units in Saint Paul were built before 1980. The age of existing housing suggests that rehabilitation is needed to provide decent, affordable housing into the future. This was corroborated through the citizen participation process and agency consultation.
2	<b>Priority Need Name</b>	Development of new affordable housing
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents
	<b>Geographic Areas Affected</b>	Other
	<b>Associated Goals</b>	Development of New Housing
	<b>Description</b>	Supporting the development of new affordable housing for low/moderate income households.

	<b>Basis for Relative Priority</b>	The housing market analysis demonstrates that there is not sufficient affordable housing for households at all income levels in Saint Paul. For households earning 0-30% AMI, there are only 7,265 rental units and more than three times as many households in need of that housing. The need for affordable housing development was corroborated through the citizen participation process and agency consultation.
3	<b>Priority Need Name</b>	<b>Support stable, affordable, and well-maintained homeownership;</b>
	<b>Priority Level</b>	High
	<b>Population</b>	Low Moderate Large Families Families with Children Elderly
	<b>Geographic Areas Affected</b>	Other
	<b>Associated Goals</b>	Homeowner Housing Rehabilitation
	<b>Description</b>	Providing access to low-interest loans and down-payment assistance for new/prospective homeowners and housing rehabilitation assistance for homeownership units.
	<b>Basis for Relative Priority</b>	The housing market analysis demonstrates that 87% of owner-occupied units (primarily single-family homes) were built before 1980 with 64% being built before 1950. The age of the single-family housing stock coupled with the level of cost burden experienced by low-to-moderate income owners makes home maintenance issues critically important in Saint Paul. In addition, it was evident through the citizen participation process and agency consultation that many Saint Paul residents would like to be able to age in place, making ongoing maintenance a priority for many homeowners.
4	<b>Priority Need Name</b>	<b>Emergency shelters, unsheltered prevention and support services;</b>
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Chronic Homelessness Individuals Mentally Ill Chronic Substance Abuse Veterans Victims of Domestic Violence Unaccompanied Youth

	<b>Geographic Areas Affected</b>	Other
	<b>Associated Goals</b>	Homeless Prevention
	<b>Description</b>	Supporting the development and operation of emergency shelters, increased shelter beds, and transitional housing opportunities; providing services such as low- and no-interest rehabilitation loans, credit counseling, emergency rental assistance, mortgage foreclosure prevention, and other short-term emergency financial assistance to keep families in their current housing or prevent them from becoming unhoused; providing rapid re-housing services for those currently experiencing homelessness to help obtain housing quickly and to stay housed; and connection to supportive services for mental health, substance use treatment, and employment resources.
	<b>Basis for Relative Priority</b>	Ramsey County CoC cites homeless prevention and rapid re-housing as priorities for ESG funds. The Homeless Needs Assessment section demonstrates that there is a need for more supportive services for chronically homeless individuals, more rapid re-housing for those who are recently homeless, and more resources for homeless prevention for those at risk of becoming homeless. The homeless needs assessment also demonstrates a need for more shelter beds and warming spaces, especially for families. Ramsey County CoC cites shelter capacities, and assessors and navigators for the Coordinated Entry System, as priorities. Families with dependent children experiencing homelessness is also cited as the priority group. This was corroborated through the agency consultation process and the citizen participation process.
5	<b>Priority Need Name</b>	<b>Public services, including tenant and landlord education;</b>
	<b>Priority Level</b>	High
	<b>Population</b>	Non-housing Community Development Extremely Low Low Moderate Large Families Families with Children
	<b>Geographic Areas Affected</b>	Other
	<b>Associated Goals</b>	Public Services
	<b>Description</b>	Providing additional public services that supplement existing services, including health services, senior services, crime prevention, community organizing, youth employment training, other youth services, and landlord and tenant education on issues related to maintenance of rental housing units and tenant and landlord responsibilities.



6	<b>Basis for Relative Priority</b>	Through the non-homeless special needs assessment and non-housing community development asset analysis, it was evident that there is an increasing need for public services for Saint Paul residents. Services related to health, youth, education, and workforce skills are needed. Tenants and landlords who can access education on requirements for tenants' rights and housing maintenance can improve housing outcomes across the city. The City's Department of Safety and Inspections holds monthly workshops for landlords on property maintenance, safety standards, and city permit requirements. This was corroborated through the citizen participation and agency consultation process.
	<b>Priority Need Name</b>	Fair Housing and anti-discrimination efforts
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Families with Children Elderly Public Housing Residents Chronic Homelessness Individuals Mentally Ill Chronic Substance Abuse Veterans Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Victims of Domestic Violence
	<b>Geographic Areas Affected</b>	Other
	<b>Associated Goals</b>	
	<b>Description</b>	Supporting activities that Affirmatively Further Fair Housing and provide legal assistance to residents who have housing discrimination claims and/or are at risk of losing their housing.

	<b>Basis for Relative Priority</b>	Housing discrimination can be a significant barrier for individuals and families seeking affordable housing. While discrimination is often difficult to detect, discrimination against persons based on race/ethnicity, familial status, language, gender, age, disability, and receipt of public assistance can prevent access to safe and decent housing. In 2019, the City formed a new Office of Financial Empowerment (OFE), including a full-time Fair Housing Coordinator who works with several City departments and residents as well as with the regional Fair Housing Implementation Committee to establish policies, regulations, and programs to proactively ensure that Saint Paul residents do not experience housing discrimination and to affirmatively further fair housing. The OFE developed a Fair Housing strategy framework with overarching goals of decreasing housing displacement, increasing housing access, and focusing on Affirmatively Furthering Fair Housing. Work in four core areas will help achieve these goals: Preservation and Production, Education and Engagement, Enforcement and Compliance, and Tenant Protections. When housing discrimination occurs, the City’s Human Rights and Equal Economic Opportunity (HREEO) Department investigates complaints. The City also supports Southern Minnesota Regional Legal Services (SMRLS), which provides legal assistance to tenants at-risk of losing their housing, and the City has signed on to a national effort to increase equity in housing, hiring, and other avenues. The importance of supporting Fair Housing and anti-discrimination efforts was corroborated during the citizen participation process and agency consultation.
13	<b>Priority Need Name</b>	<b>Pre-development support, including lead-based paint abatement, acquisition, demolition, and clearance of property;</b>
	<b>Priority Level</b>	High
	<b>Population</b>	Families with Children
	<b>Geographic Areas Affected</b>	Other
	<b>Associated Goals</b>	Remediation of Substandard Properties
	<b>Description</b>	Identify properties for development or rehabilitation; Purchase and/or demolish and/or dispose of and/or clear vacant, underutilized, and/or hazardous properties. Address the HUD regulations on lead-based paint hazards in federally owned housing and housing receiving federal assistance.
	<b>Basis for Relative Priority</b>	The lead-based paint found in many homes and buildings built before 1978 are a health risk, especially for young children. Addressing lead-based paint hazards and increasing access to housing without these hazards is important for the long-term health of city residents. Vacant buildings and nuisance properties can pose a threat to the public health and safety of City residents. Since Saint Paul is fully developed with limited land available, rehabilitation or removal of these properties can be important for neighborhood redevelopment and revitalization.
10	<b>Priority Need Name</b>	<b>Improve public infrastructure, city facilities, and community spaces;</b>
	<b>Priority Level</b>	high

	<b>Population</b>	Non-housing Community Development
	<b>Geographic Areas Affected</b>	Other
	<b>Associated Goals</b>	Public Improvements
	<b>Description</b>	Renovation of existing public facilities in need of improvement; repair and replacement of infrastructure in the public realm such as sidewalks, streets, and sewer improvements. Pedestrian and bicycle infrastructure improvements. Library and community gathering space improvements, events, and programming for young people and elderly residents, and all ages in between.
	<b>Basis for Relative Priority</b>	Although public infrastructure and facilities were highly rated by survey respondents and community input, the City of Saint Paul has a variety of other funding sources that are used for infrastructure and facility projects. However, events and programming for all ages, community gathering spaces, and improved bicycle and pedestrian infrastructure, were rated as highly needed throughout the citizen participation process.
<b>11</b>	<b>Priority Need Name</b>	<b>Economic development and job growth</b>
	<b>Priority Level</b>	High
	<b>Population</b>	Non-housing Community Development
	<b>Geographic Areas Affected</b>	Other
	<b>Associated Goals</b>	Economic Development
	<b>Description</b>	Economic development activities including job creation; small business education and façade improvements; energy conservation improvements; leasehold improvements; and increased commercial and industrial development citywide.
	<b>Basis for Relative Priority</b>	The Saint Paul Comprehensive Economic Development Strategy include expanding business attraction, retention, and expansion activities; support innovative entrepreneurship and small business development; build and market the Saint Paul brand; direct new development to high-priority geographies and sites in the City; invest in Downtown; and align resources around spotlight neighborhoods. The City’s anti-poverty strategy and economic development initiatives include supporting businesses and building an environment where more innovative businesses can locate, start up, and continue to grow. The importance of economic development efforts and business support was corroborated through the agency consultation process and citizen participation.
<b>15</b>	<b>Priority Need Name</b>	<b>Community outreach and engagement;</b>
	<b>Priority Level</b>	High
	<b>Population</b>	Non-housing Community Development

	<b>Geographic Areas Affected</b>	Other
	<b>Associated Goals</b>	Community Engagement
	<b>Description</b>	Outreach to underserved populations regarding community needs and available programs, services, and resources. Improved communication and engagement with communities regarding the City’s services, projects, and programs.
	<b>Basis for Relative Priority</b>	Through the citizen participation and agency consultation process, it was evident that more outreach and improved communication is needed, especially to historically underserved communities. It was learned that many residents and businesses do not know about the programs and services available to them, and lack the ability to share their needs efficiently with the City.
12	<b>Priority Need Name</b>	<b>Community planning needs</b>
	<b>Priority Level</b>	High
	<b>Population</b>	Non-housing Community Development
	<b>Geographic Areas Affected</b>	Other
	<b>Associated Goals</b>	
	<b>Description</b>	Promoting the social, physical, and economic wellbeing of residents, property owners, and business owners through implementation of the Comprehensive Plan and neighborhood plans, administering zoning and land use regulations, completing HUD-required environmental reviews for property investments, and providing local data and mapping resources.
	<b>Basis for Relative Priority</b>	Planning efforts support the goals of the Consolidated Plan and its implementation priorities, strategies, and programming.

Table 48 – Priority Needs Summary

**Narrative (Optional)**

## SP-30 Influence of Market Conditions – 91.215 (b)

### Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	The City of Saint Paul does not participate in this program. The Saint Paul Public Housing Agency undertakes this type of activity.
TBRA for Non-Homeless Special Needs	The City of Saint Paul does not participate in this program. The Saint Paul Public Housing Agency undertakes this type of activity.
New Unit Production	Through analysis completed in both the Housing Needs Assessment and Market Assessment portion of this Consolidated Plan, the City has a substantial need for housing affordable to low-income households. The 2016-2020 CHAS data shows that there are only 7,265 rental housing units affordable to households earning 0-30% of AMI with 24,170 households at this income level. For owner-occupied housing, there is a lack of housing that is affordable to households earning 50% of AMI—approximately 6,100 ownership units are affordable to 17,855 households at 30-50% of AMI.
Rehabilitation	87% of owner-occupied units (primarily single-family homes) were built before 1980 with the majority (63%) being built before 1950. The age of the single-family housing stock coupled with the level of cost burden experienced by low-to-moderate income owners makes home maintenance issues critically important in the city. 73% of rental units were built before 1980 with 34% built before 1950. Property maintenance and rehabilitation of is critical to ensure the ongoing stability and revitalization of the City's neighborhoods.
Acquisition, including preservation	In areas where reinvestment is needed, the use of strategic property acquisition and either demolition or rehabilitation is critical to facilitate community revitalization efforts.

**Table 49 – Influence of Market Conditions**

## SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)

### Introduction

The City expects to receive funding allocations in 2025 similar to its 2024 allocations: \$6,765,326 in CDBG funding, \$1,534,711 in HOME funding, and \$591,281 in ESG funding. In addition, the City estimates using about \$800,000 in CDBG program income and approximately \$500,000 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 2025 are not yet passed upon drafting this 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 will be adjusted in direct proportion to the difference in actual allocations.

### 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	<ul style="list-style-type: none"> <li>• Acquisition</li> <li>• Admin and Planning</li> <li>• Economic Development</li> <li>• Housing</li> <li>• Public Improvements</li> <li>• Public Services</li> </ul>	6,765,326	234,674	0	7,000,000	35,000,000	Assumes steady funding.

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: \$		
HOME	public - federal	<ul style="list-style-type: none"> <li>• Acquisition</li> <li>• Homebuyer assistance</li> <li>• Homeowner rehab</li> <li>• Multifamily rental new construction</li> <li>• Multifamily rental rehab</li> <li>• New construction for ownership</li> <li>• TBRA</li> </ul>	1,534,711	206,225	0	1,740,936	8,704,682	Assumes steady funding.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	<ul style="list-style-type: none"> <li>• Conversion and rehab for transitional housing</li> <li>• Financial Assistance</li> <li>• Overnight shelter</li> <li>• Rapid re-housing (rental assistance)</li> <li>• Rental Assistance Services</li> <li>• Transitional housing</li> </ul>	591,281	0	0	591,281	2,956,405	Assumes steady funding.

Table 50 - Anticipated Resources

**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 and equity. 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 publicly 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.

## SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Ramsey County Social Services	Government	Homelessness, Non-homeless special needs	Jurisdiction
Saint Paul Public Housing Agency	PHA	Public Housing	Jurisdiction
City of Saint Paul Department of Planning and Economic Development	Government	Economic Development, Planning, Neighborhood improvements	Jurisdiction
Saint Paul Housing and Redevelopment Authority	Redevelopment authority	Economic Development, Ownership, Rental	Jurisdiction
Ramsey County Workforce Innovation Board	Other	Economic Development	Region
Ramsey County Continuum of Care	Continuum of care	Homelessness	Jurisdiction

**Table 51 - Institutional Delivery Structure**

### Assess of Strengths and Gaps in the Institutional Delivery System

**Availability of services targeted to homeless persons and persons with HIV and mainstream services**

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
<b>Homelessness Prevention Services</b>			
Counseling/Advocacy	X	X	X
Legal Assistance	X	X	X
Mortgage Assistance	X	X	
Rental Assistance	X	X	X
Utilities Assistance	X	X	X

Street Outreach Services			
Law Enforcement	X	X	
Mobile Clinics	X	X	
Other Street Outreach Services	X	X	
Supportive Services			
Alcohol & Drug Abuse	X	X	
Child Care	X	X	
Education	X	X	
Employment and Employment Training	X	X	
Healthcare	X	X	
HIV/AIDS	X	X	X
Life Skills	X	X	
Mental Health Counseling	X	X	
Transportation	X	X	
Other			
Other			

Table 52 - Homeless Prevention Services Summary

**Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)**

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 integrates mental health and county case management services into the existing outreach programs. Familiar Faces offers a more efficient crisis support, shelter, and wrap-around service planning model.

The City and Ramsey County coordinate in partnership with Ramsey County Continuum of Care (CoC). The ESG program provides funding for homelessness initiatives which include homelessness prevention services, street outreach services, supportive services, shelter operations, and rapid re-housing

programs. The City will continue to partner with Ramsey County CoC Governing Committee, and Ramsey County Family Homelessness Assistance Program (FHAP) Committee to implement *Heading Home Ramsey* – a comprehensive plan to end homelessness in Ramsey County. The City and County CoC will continue to partner with the State's Veterans Homelessness Advisory Committee to develop housing initiatives for homeless veterans.

ESG-funded community agencies provide resources to homeless or at-risk of being homeless citizens. For single adults, Higher Ground Saint Paul provides emergency shelter while providing supportive services, such as mental health counseling, during the day. Catholic Charities' Family Service Center provided emergency shelter for families for up to 60 days – allowing time for families to seek more permanent housing. The City also owns St. Paul Residence, providing supportive housing for chronically inebriated residents. Transitional housing is provided through the YWCA St. Paul (housing with supportive services for single-parent families), Theresa Living Center (housing for single women and single-parent families), Lutheran Social Services (LSS) Life Haven (housing for teen parents). Ain Dah Yung provides culturally-response emergency shelter for urban American Indian young adults; Face to Face's SafeZone - day drop-in center/supportive services and RRH; and LSS's Safe House - transitional housing services.

Housing services are complemented by community-based services for residents experiencing homelessness, such as Listening House (drop-in for homeless adults) and Interfaith Action's Project Home Day Center (a day center for families experiencing homelessness). The YWCA St. Paul collaborates with Ramsey County Coordinated Entry, Public Housing Agency, Ramsey County Workforce Solutions, Saint Paul Public Schools and other partners to provide safe affordable housing; comprehensive support services; employment and educational training; and health & wellness initiatives to advance the mission of eliminating racism and empowering women. The First Lutheran Church Wellness Center (community nursing care to homeless citizens or citizens living in extreme poverty) emerged from a collaboration among First Lutheran Church, Metro State College, RADIUS Health and other East Side service providers.

For homelessness prevention, HouseCalls (a collaboration of Minnesota Community Care and St. Paul-Ramsey County Health Department) and East Side Family Center – Neighborhood House provides emergency financial assistance, including emergency utility assistance. Southern Minnesota Regional Legal Services provides legal assistance to tenants-at-risk of losing their housing.

**Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above**

The City, Ramsey County Community Services, Ramsey County CoC, Saint Paul PHA, and community service providers provide support services responsive to the needs of special populations, persons experiencing homelessness (individuals, families, youth, and underserved populations), and veterans.

The City/County allocate federal and state funds to provide street outreach, homelessness prevention, and rapid re-housing services to adults, families, youth, and underserved populations facing homelessness. The County provides services for elderly, frail elderly, developmentally challenged, physically challenged, mental health challenged, persons with HIV, and persons with chemical dependency. Saint Paul PHA provides support services for elderly, frail elderly, persons with a brain injury, and persons with physical challenges.

As the major social service provider, Ramsey County allocates federal and state funds to community agencies that serve residents experiencing homelessness and residents with special needs. On the other hand, Saint Paul and the State of Minnesota finance the preservation or new construction of affordable housing and supportive housing in Saint Paul. Together, the County (provider of social services) and the City (builder of affordable housing) can respond to needs of residents experiencing homelessness and residents with special needs. In the past, in face of overwhelming need of shelters, organizations have worked together to take action. The City, Ramsey County, Model Cities, Catholic Charities, and Saint Paul Foundation worked together to open an additional overflow emergency shelter to meet the increasing demands of single homeless adults. Catholic Charities, MHFA, the City, and private donors worked together to develop the new Dorothy Day Center, Higher Ground Saint Paul and Dorothy Day Residence, which provides shelter beds and supportive housing units.

Through collaboration with City Departments, the Office of Financial Empowerment, and additional stakeholders, the City continues to explore tenant protections to reduce evictions, ways to increase housing, and increase resident access to stable housing.

The City, Ramsey County, and community agencies work together to provide comprehensive services to assist residents experiencing homelessness and residents with special needs. Gaps in service delivery include the lack of sufficient funds to pay for the necessary services and the lack of sufficient targeted outreach to residents that may benefit from services.

### **Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs**

The City's institutional structure and service delivery system includes working with its partners to design service programs that work to address the needs of city residents. The City, in partnership with Ramsey County, the Public Housing Authority and social services agencies, collaboratively use community-wide gaps analysis to develop service protocols that are responsive to the needs of individuals, families, youth, and underserved populations such as residents with limited English proficiency and veterans. Still, gaps in the delivery of services occur including the lack of sufficient funds and sufficient targeted outreach to residents that may benefit from services.

The City will continue to grow its collaborative working partnerships to address the community's needs with limited financial resources. Saint Paul will continue to coordinate services with Ramsey County (the primary public service provider in the City), and the Saint Paul Public Housing Agency (the administrator of public housing and housing choice vouchers in Saint Paul), and community nonprofit organizations. In the past, these partnerships have also included the private sector as well as coordination with institutional private and public health care providers.

In response to the lack of sufficient outreach to residents that may benefit from services, the City restructured its street outreach program from an enforcement-based approach to a service-based approach to strategically address the needs of those experiencing homelessness in a team called the Homeless Assistance Response Team. In coordination with Ramsey County and other service providers, this approach aligns City and County resources to ensure that every individual can be connected to services. The program includes a response strategy to receiving calls and managing homeless encampments and increased coordination among service agencies to provide assessments, support, and resources. The City is also partnering with Ramsey County to launch a new program called Familiar Faces to address the complicated needs of individuals experiencing homelessness who have been caught in cycles of institutional or correctional facilities. The City, Ramsey County, and partner organizations continue to look for better ways to work collaboratively and efficiently and align their strategies to comprehensively approach outreach and service gaps.

## SP-45 Goals Summary – 91.215(a)(4)

### 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	Citywide	Homeless prevention	ESG: \$2,956,405	Homelessness Prevention: 15,000 Persons Assisted
2	Development of New Housing	2025	2030	Affordable Housing	Citywide	Development of new affordable housing	CDBG: \$1,100,000 HOME: \$7,834,214	Rental units constructed: 75 Household Housing Unit
3	Rental Housing Rehabilitation	2025	2030	Affordable Housing	Citywide	Preservation of existing affordable housing	CDBG: \$6,100,000	Rental units rehabilitated: 130 Household Housing Unit
4	Homeowner Housing Rehabilitation	2025	2030	Affordable Housing	Citywide	Support stable, affordable, safe homeownership	CDBG: \$10,660,000	Homeowner Housing Rehabilitated: 255 Household Housing Unit
5	Public Services	2025	2030	Non-Housing Community Development	Citywide	Public service needs	CDBG: \$415,000	Public service activities other than Low/Moderate Income Housing Benefit: 15,000 Persons Assisted



Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	Community Engagement	2025	2030	Non-Housing Community Development	Citywide	Community outreach to underserved populations	CDBG: \$1,725,000	Public service activities other than Low/Moderate Income Housing Benefit: 906,500 Persons Assisted
7	Youth Employment	2025	2030	Non-Housing Community Development	Citywide	Public service needs	CDBG: \$2,700,000	Public service activities other than Low/Moderate Income Housing Benefit: 1,290 Persons Assisted
8	Economic Development	2025	2030	Non-Housing Community Development	Citywide	Economic development and job growth	CDBG: \$1,825,000	Businesses assisted: 75 Businesses Assisted
9	Remediation of Substandard Properties	2025	2030	Non-Housing Community Development	Citywide	Acquisition, demolition, and clearance of property	CDBG: \$700,000	Buildings Demolished: 85 Buildings
10	Public Improvements	2025	2030	Non-Housing Community Development	Citywide	Public facilities and infrastructure	CDBG: \$2,750,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 35,625 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
11	NRSA - Railroad Island/Hamms	2025	2030	Affordable Housing Non-Housing Community Development	Citywide	Preservation of existing affordable housing Development of new affordable housing Support stable, affordable, safe homeownership Economic development and job growth	CDBG: \$25,000	Homeowner Housing Added: 10 Household Housing Unit

Table 53 – Goals Summary

**Goal Descriptions**

1	<b>Goal Name</b>	Homeless Prevention
	<b>Goal Description</b>	Homeless prevention, shelter operations, essential services, street outreach, rapid re-housing.

2	<b>Goal Name</b>	<b>Development of New Housing</b>
	<b>Goal Description</b>	Address the need for affordability of decent housing by supporting the development of new housing.
3	<b>Goal Name</b>	<b>Rental Housing Rehabilitation</b>
	<b>Goal Description</b>	Address the need of sustaining decent housing by providing rehabilitation assistance to rental housing occupied by low/moderate-income households.
4	<b>Goal Name</b>	<b>Homeowner Housing Rehabilitation</b>
	<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>	<b>Public Services</b>
	<b>Goal Description</b>	Improve the availability of a suitable living environment by funding public service activities.
6	<b>Goal Name</b>	<b>Community Engagement</b>
	<b>Goal Description</b>	Address the sustainability of a suitable living environment by providing funding for public information & crime prevention programs.
7	<b>Goal Name</b>	<b>Youth Employment</b>
	<b>Goal Description</b>	Address the availability of economic opportunity by providing employment opportunities and training to city youth.
8	<b>Goal Name</b>	<b>Economic Development</b>
	<b>Goal Description</b>	Address the sustainability of economic opportunity by assisting businesses with rehabilitation or economic development activities.

9	<b>Goal Name</b>	<b>Remediation of Substandard Properties</b>
	<b>Goal Description</b>	Address the sustainability of a suitable living environment by acquiring or demolishing substandard properties.
10	<b>Goal Name</b>	<b>Public Improvements</b>
	<b>Goal Description</b>	Address the sustainability of a suitable living environment by renovating existing public facilities in need of improvements.
11	<b>Goal Name</b>	<b>NRSA - Railroad Island/Hamms</b>
	<b>Goal Description</b>	Direct targeted investments for housing and economic development to the Railroad Island/Hamms area neighborhood revitalization strategy area.

**Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)**

## **SP-50 Public Housing Accessibility and Involvement – 91.215(c)**

### **Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)**

It is the policy of the Saint Paul PHA to fully comply with Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act and Title II of the Americans with Disabilities Act. The PHA has not been required to execute a Voluntary Compliance Agreement (VCA).

PHA also maintains past improvements at its hi-rises, community centers and other locations that made the common restrooms, common areas, corridors, elevators, parking lots and entries fully accessible as well as the PHA Central Administrative Office building meets all Section 504 ADA requirements.

### **Activities to Increase Resident Involvements**

**Resident Advisory Board** - As required by the Public Housing Reform Act of 1998 (QHWRA) since 1999, the SPPHA has convened a Resident Advisory Board (RAB) annually to update an Annual Agency Plan. The RAB membership has been comprised of the following:

- All members of the Hi-Rise Presidents Council (16 Hi-Rise buildings).
- All members of the Family Residents' City-Wide Residents Council (16 members, including the 4 officers from each of the 4 family housing developments).
- Section 8/HCV representatives who volunteered for the RAB.
- Two PHA Commissioners - 1 Commissioner represents the hi-rise residents, and 1 Commissioner represents residents of the family housing developments and scattered site homes.

Each year PHA Senior Management has met with the RAB, including the Hi-Rise Presidents Council and the Family City-Wide Residents' Council, to discuss PHA policy changes, the Annual and 5-Year Agency Plan, and Capital Improvements. The PHA Resident Initiatives Department and the Resident Councils work together to form new partnerships with community service agencies for the benefit of residents.

The PHA annually updates its Agency Plan for the fiscal year; staff reviews the plan with the RAB and representatives from tenant advocacy organizations. The draft is then released for public comment and a public hearing is held in mid-November.

In Calendar Year 2020 and thereafter, only the PHA's 418 units remaining in the public housing program will be covered by the Agency Plan. The PBRA program does not have a comparable requirement.

**Section 3** – To promote economic opportunities, the PHA implements the Federal Section 3 mandate, to the greatest extent possible, by hiring qualified PHA residents and qualified Section 3 businesses.

Section 3 provides employment and other economic opportunities generated using HUD funds to be directed to low- and very low-income citizens and businesses owned by PHA residents or other low-income persons. PHA has provided job skills training and employment opportunities for residents using a HUD Resident Opportunities and Self Sufficiency (ROSS) Grant. Thanks to the ROSS Grant Coordinators' hard work, public housing residents have been able to access job skills training and attend hiring fairs at PHA community centers. PHA residents were provided Workplace Essentials training by Avivo (formerly Minnesota Resource Center). Twenty (20) PHA residents have successfully completed small business training provided by African Economic Development Solutions (AEDS). Moving forward, these graduates will have access to unlimited counseling in business development, marketing insights, general support and financial advice, leads, and Sharia banking if relevant.

**Is the public housing agency designated as troubled under 24 CFR part 902?**

No

**Plan to remove the 'troubled' designation**

**Not applicable.** In 2019, the PHA earned HUD's High Performer rating for the 29th consecutive year under HUD's Public Housing Management Assessment Program (PHMAP). SPPHA has also maintained HUD High Performer status under HUD's Section 8 Management Assessment Program (SEMAP) for 23 years.

As explained elsewhere, the PHA has a continual need for stable Federal funding to maintain its high standards. The PHA received approval from HUD to convert most its public housing properties under the RAD Program. The debt-free conversion to Project-Based Rental Assistance (PBRA) is effective January 1, 2020.

## **SP-55 Barriers to affordable housing – 91.215(h)**

### **Barriers to Affordable Housing**

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 household 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 costs and lack of funding 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 and insufficient allocation of LIHTCs 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. The City's LIHTC allocation also continues to shrink.

### **Strategy to Remove or Ameliorate the Barriers to Affordable Housing**

There are about 18,000 publicly assisted affordable housing units within Saint Paul; roughly 9,400 are subsidized through the PHA. The City finances preservation, rehabilitation and construction of affordable housing citywide using city-owned and discounted County-owned land and local, state, and federal funds and financing tools - LIHTCs, Federal and State Historic Preservation Tax Credits, and issuing Housing Revenue bonds.

City Council Resolution 18-1204 outlines 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. Requiring a minimum number of off-street parking can increase the cost of development and in 2021, the City eliminated these zoning requirements. 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.

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 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.

In the past two 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. 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.

Affordable housing is an important element of redevelopment with City investment in infrastructure. 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



## **SP-60 Homelessness Strategy – 91.215(d)**

### **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 department and other prevention resources such as the Minnesota Housing Prevention and Assistance (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

Since 2020, the CoC's Coordinated Entry Workgroup has implemented a series of initiatives that originated from recommendations from the Ramsey County 2020 CES Evaluation to improve outcomes. These include 1) Having Coordinated Entry Assessors provide trauma-informed care. The training, which occurred in September 2023, emphasized trauma-informed care, client choice, confidentiality, administration of the assessment, entering assessments into the Homeless Management Information System (HMIS), and coordinating with Day One Services, a statewide network of domestic sexual assault, human trafficking and youth and advocacy programs in Minnesota. 2) Developing the Transfers, Reviews and Accommodations in Coordinated Entry (TRACE) Committee. The TRACE Committee meets on an as-needed basis and approves and prioritizes the clients to be considered first for eligible vacancies. A main gap (identified by community) is individuals and families requesting a transfer or identifying domestic violence situations while on housing weren't always getting the warm hand-off and access to safety planning services, as the two systems (DV and housing) are often too siloed. With the advent of a new DV Coordinated Entry-specific project, the community can confidently provide more adequate safety planning. 3) Revised its Anti-discrimination policy. The policy applies to staff, volunteers, and contractors, including CoC and ESG-funded agencies. This policy requires agencies comply with the nondiscrimination and equal opportunity provisions of Federal civil rights laws. 4) Incorporating Coordinated Entry-specific monitoring visits with CoC-funded organizations, which began in 2023. 5) Evaluating new project applications using the CoC Program Rating and Ranking Tool created primarily for Coordinated Entry and the Homeless Management Information System (HMIS) projects. The tools cover CoC threshold requirements, project performance measures, responses to local e-SNAPS applications, annual monitoring results, alignment with HUD NOFO policies and CoC Needs Assessment. 6) Conduct a CES policy review to identify existing policies that people with lived experience of homelessness,

providers, and CES Priority List Manager identify as creating barriers to access to CES and housing referral; 7) remove people from the priority list who have not been in contact with providers/CES priority list staff or show up in the City/Ramsey County HMIS for several years; 8) increase the number of people being assessed; 9) with post-assessment provide more connections to mainstream services (housing financial assistance, employment, landlord mediation), and 10) increase new landlord engagement/collaborations with the goal to create and increase housing options and reduces the wait time for housing.

The 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. 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 than other subpopulations of 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 and transitional housing needs of homeless persons**

The City has a Joint Powers Agreement through August 2026 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 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 from 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 emergency shelters which target single adults. Basic needs and advocacy services are provided. The shelters are located close to Catholic Charities St. Paul Opportunity Center which provides residents with easy access to daily meals, county resources, on-sight health care, veterans services, and with 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, transportation assistance, connections to benefits and advocacy. Children's services include mentoring, tutoring, and early childhood education. Note the Family Service Center is in Maplewood but serves 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 Coordinated Entry System (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.

New in 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 day and evenings and weekends to hold shelter beds- this 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. 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 Homeless Action Team, and 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.

According to the Heading Home Ramsey CoC 2024 Needs Assessment, there were 2,255 Ramsey County households on one of the three priority Coordinated Entry System (CES) lists in August of 2024. These are clients that have been assessed and are waiting for a housing referral based on the needs identified during assessment. The average time someone must wait on the priority list before being referred is around 220 days or seven months.

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.

**Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving**

**assistance from public and 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 emergency assistance, 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 services providers and county corrections staff to provide assessments and referrals to the Coordinated Entry System (CES) to prioritize people for services, i.e., emergency assistance, prevention, employment services, and housing.

Face to Face – Homeless Prevention: The target population is unaccompanied youth aged 18-24 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. On-going 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 homeless youth and the number who 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.

## **SP-65 Lead based paint Hazards – 91.215(i)**

### **Actions to address LBP hazards and increase access to housing without LBP 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.

### **How are the actions listed above related to the extent of lead poisoning and hazards?**

Research indicates that the greatest lead risk to children is from the lead dust from deteriorated paint on windowsills, sashes, jambs and wells (troughs). Correspondingly, the Public Health Department's lead hazard control activities continue to focus on windows in poor condition with deteriorated lead-based paint on their components. The use of this protocol continues to be very successful.

The required Lead Risk Assessment will identify all and any potential lead hazards present in the home and garage. All potential lead hazards are written into the scope of work for lead hazard reduction work with a final lead clearance test performed to confirm lead dust levels are below the regulatory dust-lead hazards standard.

### **How are the actions listed above integrated into housing policies and procedures?**

An action plan was created to develop program procedures to address the HUD regulations on lead-based paint hazards in federally owned housing and housing receiving federal assistance.

#### **Rehabilitation Programs:**

- Applicants receive the required lead-based paint information and understand their responsibilities.
- Staff properly determine whether proposed projects are exempt from some or all lead-based paint requirements.
- The level of federal assistance is properly calculated and the applicable lead-based paint requirements determined.
- Properly qualified personnel perform risk assessments, paint testing, lead hazard reduction, and clearance services when required.

- Required lead hazard reduction work and protective measures are incorporated in project rehabilitation specifications.
- Risk assessment, paint testing, lead hazard reduction, and clearance works are performed in accordance with the applicable standards established in 24 CFR, Part 35, Subpart R.
- Required lead-based paint evaluation, presumption, and hazard reduction notices are provided to occupants and documented.
- Program documents establish the rental property owners' responsibility to perform and document ongoing lead-based paint maintenance activities, when applicable.
- Program staff monitors owner compliance with ongoing lead-based paint maintenance activities.

**Home Ownership Programs:**

- Applicants for home ownership assistance receive adequate information about lead-based paint requirements.
- Staff properly determines whether proposed projects are exempt from some or all lead -based paint requirements.
- A proper visual assessment is performed to identify deteriorated paint in the dwelling unit, common areas serving the unit, and building exterior surfaces.
- Prior to occupancy, properly qualified personnel perform paint stabilization and ensure that the dwelling unit passes a clearance exam in accordance with the standards established in 24 CFR, Part, 35, Subpart R.
- The home purchaser receives the required lead-based paint pamphlet and notices.
- If rehabilitation is involved, program staff will also need to ensure the applicable rehabilitation requirements are addressed.

**Special Needs Program:**

- Applicants for special needs housing assistance receive adequate information about lead-based paint requirements.
- Staff properly determines whether proposed projects are exempt from some or all lead -based paint requirements.
- A proper visual assessment is performed to identify deteriorated paint in the dwelling unit, common areas serving the unit, and building exterior surfaces.
- Prior to occupancy, properly qualified personnel perform paint stabilization and ensure that the dwelling unit passes a clearance exam in accordance with the standards established in 24 CFR, Part, 35, Subpart R.
- Occupants receive the required lead-based paint pamphlet and notices.

- Required ongoing lead-based paint maintenance activities are incorporated into project operations if the assistance involves a continual relationship with HUD.
- If rehabilitation is involved, program staff will also need to ensure the applicable rehabilitation requirements are addressed.

### **Continuation of integrated housing policies and procedures**

#### **Tenant Based Rental Assistance Programs:**

- Rental assistance programs are administered by the Saint Paul Public Housing Agency and Metro HRA. These agencies have implemented the HUD regulation. A major focus is identifying deteriorated paint during the annual inspection of a property. These cited properties are referred to Saint Paul-Ramsey County Public Health for clearance testing following corrective actions. Safe lead abatement training is available to all property owners participating in the tenant based rental assistance programs.



## **SP-70 Anti-Poverty Strategy – 91.215(j)**

### **Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families**

Critical to reducing poverty is workforce development and skills training and access to economic opportunity. 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.

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 of Saint Paul and Minneapolis, Minneapolis Public Housing Authority, Ramsey, Hennepin and Anoka Counties and Community Development Agencies of Washington and Dakota Counties.

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.

Minimum Wage Ordinance – sets the lowest hourly pay rate for work done in Saint Paul. The minimum wage varies based on a business's size and increases in phases. The City will require businesses of all sizes to pay their employees a minimum wage of \$15 an hour by 2027.

Office of Financial Empowerment - Saint Paul established the Office of Financial Empowerment (OFE) in 2019 because economic inequality is a whole-city crisis that demands a whole-city response. OFE is working deliberately to help a new generation of Saint Paul residents repair those generational injustices and build equitable economic power for decades to come.

- OFE welcomes every new baby to our city with \$50 in a college savings account — a small but powerful investment in each child's boundless potential — through the CollegeBound Saint Paul program. CollegeBound also provides opportunities for families to grow the account and earn bonus deposits through engaging in the program or completing activities related to the development of their child or their family's financial stability.
- OFE leads the City's strategy around guaranteed income which provides monthly unrestricted cash to eligible families with children with CollegeBound accounts. The People's Prosperity Pilot provided 150 families with \$500 a month for 18 months, and research results showed positive trends in employment, physical and mental health, and other indicators of well-being and

quality of life. The current program CollegeBound Boost provides 333 families with \$500 for 24 months.

- OFE oversees the Medical Debt Reset Initiative, which is a partnership with national nonprofit Undue Medical Debt to acquire and cancel an estimated \$110 million in medical debt for Saint Paul residents. Medical debt poses a large financial burden for many individuals and families, and by easing this burden, the City helps residents build health and wealth in their communities.
- OFE manages the LOCAL Fund which uses shared ownership models to build local economic wealth among Saint Paul residents and small businesses. The LOCAL Fund aims to achieve healthy and sustainable neighborhoods through recovery of vacant and abandoned properties and to mitigate the enduring economic impacts of the pandemic on small businesses.

Open for Business – a one-stop shop for start-up and existing businesses to get information and leverage resources. The program provides a pocket guide (in several languages) to starting a business in Saint Paul; connection with information and resources to start, move or expand a business; and help from a Business Project Facilitator as a guide through the permitting and licensing process of opening, expanding or moving to the City.

### **How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan**

Saint Paul has programs and policies with the goal of reducing the number of poverty-level families in the city. These programs complement the affordable housing programs being carried out by the City and assist in providing a suitable living environment for residents. Human/public service activities which help city residents without the financial resources to meet their basic needs are provided primarily by Ramsey County. Services provided by the County include financial assistance through the Minnesota Family Investment Program, Diversionary Work Program, medical assistance, childcare assistance, and food stamps. The City and its subgrantees provide additional services, which augment the work being done by the County. Health services, senior services, and employment training are all provided to low-income city residents. All these programs assist in helping or reducing the number of poverty level families in the city. Despite funding cuts from virtually all sources, the City will continue to provide funding to as many of these activities as possible, and to serve households living below the poverty level.

## **SP-80 Monitoring – 91.230**

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

The City's Grants Management division of the Planning and Economic Development Department serves as the City's overall grant administrator ensuring compliance with all pertinent CDBG, HOME and ESG program regulations and requirements and ensuring all activities meet intended goals, including timely expenditure of funds. The City uses an outside consultant to assist in monitoring its CDBG subgrantees and to ensure that HOME-assisted units meet rent, occupancy, income and property standards requirements through the property's affordability period. Listed below are the major components of the City's ongoing monitoring system.

**Proposal Reviews** – All projects and programs proposed to receive HUD funding are reviewed by staff to determine if the activity is eligible, meets a national objective, and is in conformance with the Consolidated Plan.

**Contracts** – All non-City entities receiving CDBG, HOME or ESG funding are required to enter into a written agreement with the City. This agreement identifies all applicable federal, state and local regulations and compliance requirements associated with the activity. The agreement identifies specific activities to be carried out, timeline for carrying out the activities, and a detailed budget.

**Desk Monitoring** – Each time a reimbursement is requested for either a City or subgrantee administered activity, documentation of the expenses, and a report which updates the progress and accomplishments of the activity must be included. Reimbursement requests are reviewed for accuracy by the City project manager and accounting staff before reimbursements are made.

**On-Site Monitoring** – In addition to using an outside consultant, City staff conducts site visits to subgrantees receiving HUD funds for projects and programs. Selection of subgrantees is based on risk factors, including the amount of funding allocated, the complexity of the project or program being carried out, and the experience and capacity of the group receiving the funding. On-site monitoring examines subgrantees' financial systems and controls, cost reasonableness of activities, income and program eligibility of participants, project progress, and other applicable requirements. In accordance with HOME regulations, all HOME funded programs are reviewed each year, and HOME assisted properties with long-term compliance requirements are inspected as prescribed.

**Reporting** – The City prepares a Consolidated Annual Performance and Evaluation Report (CAPER) for submission to HUD annually. The CAPER details the progress and accomplishments of CDBG, HOME and ESG funded activities. CAPER data is taken from report forms submitted with each project or program

reimbursement request, which allows for tracking progress of HUD-funded activities on an on-going basis. The City also updates the HUD reporting system (IDIS) throughout the year.

**Labor Standards and Section 3** – The City monitors contract compliance for labor standards and Section 3 through B2GNow, which has a certification portal for CERT (a small business certification program recognized by Hennepin County, Ramsey County, the City of Minneapolis and the City of Saint Paul and certifies Minority-Owned Business Enterprise (MBE), Women-Owned Business Enterprise (WBE), and Small Business Enterprise (SBE)). Once a business certifies, the certification carries over to the compliance module, enabling contractors to search for certified subs. The system audits projects monthly to confirm payments to subcontractors. The Department of Human Rights and Equal Employment Opportunity (HREEO) staff monitor all compliance. Payment approval goes through HREEO, and HREEO holds draws until contractors are compliant. For Section 3, the City uses the same compliance monitoring program through B2GNow to ensure compliance.

## Expected Resources

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

#### Introduction

The City expects to receive funding allocations in 2025 similar to its 2024 allocations: \$6,765,326 in CDBG funding, \$1,534,711 in HOME funding, and \$591,281 in ESG funding from HUD in 2025. In addition, the City estimates using about \$235,000 in CDBG program income and approximately \$206,000 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 2025 are not yet passed upon drafting this 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 will be adjusted in direct proportion to the difference in actual allocations and program income estimates will be re-evaluated.

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. These resources may include:

- Local Housing Trust Fund
- Sales Tax Revitalization program (STAR) – ½ cent sales tax for community development investments
- Housing and Redevelopment Authority (HRA) revenues
- City Tax Increment Financing, Low-Income Housing Tax Credits Issuance of Housing Revenue and 501(c)3 Conduit Revenue Bonds
- Continuum of Care resources
- Private match for ESG investments
- Private match for HOME capital investments
- Minnesota Department of Employment and Economic Development (DEED) business loans and brownfield remediation and

- development grants
- Minnesota Housing Finance Agency (MNFA)
- Metropolitan Council brownfield remediation and community development grants

**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	<ul style="list-style-type: none"> <li>• Acquisition</li> <li>• Admin and Planning</li> <li>• Economic Development</li> <li>• Housing</li> <li>• Public Improvements</li> <li>• Public Services</li> </ul>	6,765,326	234,674	0	7,000,000	35,000,000	Assumes steady funding.
HOME	public - federal	<ul style="list-style-type: none"> <li>• Acquisition</li> <li>• Homebuyer assistance</li> <li>• Homeowner rehab</li> <li>• Multifamily rental new construction</li> <li>• Multifamily rental rehab</li> <li>• New construction for ownership</li> <li>• TBRA</li> </ul>	1,534,711	206,225	0	1,740,936	8,704,682	Assumes steady funding.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	<ul style="list-style-type: none"> <li>• Conversion and rehab for transitional housing</li> <li>• Financial Assistance</li> <li>• Overnight shelter</li> <li>• Rapid re-housing (rental assistance)</li> <li>• Rental Assistance Services</li> <li>• Transitional housing</li> </ul>	591,281	0	0	591,281	2,956,405	Assumes steady funding.

**Table 54 - 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 again received a match reduction of 50 percent due to fiscal distress and is required to match each dollar spent with 12.5 cents of non-federal match. 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 and equity. 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 publicly 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**

The City expects to receive funding allocations in 2025 similar to its 2024 allocations: \$6,765,326 in CDBG funding, \$1,534,711 in HOME funding, and \$591,281 in ESG funding from HUD in 2025. In addition, the City estimates using about \$235,000 in CDBG program income and approximately \$206,000 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 2025 are not yet passed upon drafting this 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 will be adjusted in direct proportion to the difference in actual allocations and anticipated Program Income may be adjusted. The City expects to meet matching dollar requirements from various City and developer sources, and expects to use City-owned property for development in certain cases.

## **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	Citywide	Homeless prevention	ESG: \$591,281	Homelessness Prevention: 3,000 Persons Assisted
2	Development of New Housing	2025	2030	Affordable Housing	Citywide	Development of new affordable housing	CDBG: \$220,000 HOME: \$1,566,843	Rental units constructed: 15 Household Housing Unit
3	Rental Housing Rehabilitation	2025	2030	Affordable Housing	Citywide	Preservation of existing affordable housing	CDBG: \$1,220,000	Rental units rehabilitated: 25 Household Housing Unit
4	Homeowner Housing Rehabilitation	2025	2030	Affordable Housing	Citywide	Support stable, affordable, safe homeownership	CDBG: \$2,132,000	Homeowner Housing Rehabilitated: 50 Household Housing Unit
5	Public Services	2025	2030	Non-Housing Community Development	Citywide	Public service needs	CDBG: \$83,000	Public service activities other than Low/Moderate Income Housing Benefit: 3,000 Persons Assisted
6	Community Engagement	2025	2030	Non-Housing Community Development	Citywide	Community outreach to underserved populations	CDBG: \$345,000	Public service activities other than Low/Moderate Income Housing Benefit: 181,300 Persons Assisted
7	Youth Employment	2025	2030	Non-Housing Community Development	Citywide	Public service needs	CDBG: \$540,000	Public service activities other than Low/Moderate Income Housing Benefit: 250 Persons Assisted
8	Economic Development	2025	2030	Non-Housing Community Development	Citywide	Economic development and job growth	CDBG: \$365,000	Businesses assisted: 15 Businesses Assisted
9	Remediation of Substandard Properties	2025	2030	Non-Housing Community Development	Citywide	Acquisition, demolition, and clearance of property	CDBG: \$140,000	Buildings Demolished: 17 Buildings

10	Public Improvements	2025	2030	Non-Housing Community Development	Citywide	Public facilities and infrastructure	CDBG: \$550,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1000 Persons Assisted
11	NRSA - Railroad Island/Hamms	2025	2030	Affordable Housing Non-Housing Community Development	Citywide	Preservation of existing affordable housing Development of new affordable housing Support stable, affordable, safe homeownership Economic development and job growth	CDBG: \$5000	Homeowner Housing Added: 2 Housing Units

Table 55 – Goals Summary

**Goal Descriptions**

1	Goal Name	Homeless Prevention
	Goal Description	Homeless prevention, shelter operations, essential services, street outreach, rapid re-housing.
2	Goal Name	Development of New Housing
	Goal Description	Address the need for affordability of decent housing by supporting the development of new housing.

3	<b>Goal Name</b>	<b>Rental Housing Rehabilitation</b>
	<b>Goal Description</b>	Address the need of sustaining decent housing by providing rehabilitation assistance to rental housing occupied by low/moderate-income households.
4	<b>Goal Name</b>	<b>Homeowner Housing Rehabilitation</b>
	<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>	<b>Public Services</b>
	<b>Goal Description</b>	Improve the availability of a suitable living environment by funding public service activities.
6	<b>Goal Name</b>	<b>Community Engagement</b>
	<b>Goal Description</b>	Address the sustainability of a suitable living environment by providing funding for public information & crime prevention programs.
7	<b>Goal Name</b>	<b>Youth Employment</b>
	<b>Goal Description</b>	Address the availability of economic opportunity by providing employment opportunities and training to city youth.
8	<b>Goal Name</b>	<b>Economic Development</b>
	<b>Goal Description</b>	Address the sustainability of economic opportunity by assisting businesses with rehabilitation or economic development activities.
9	<b>Goal Name</b>	<b>Remediation of Substandard Properties</b>
	<b>Goal Description</b>	Address the sustainability of a suitable living environment by acquiring or demolishing substandard properties.

10	<b>Goal Name</b>	<b>Public Improvements</b>
	<b>Goal Description</b>	Address the sustainability of a suitable living environment by renovating existing public facilities in need of improvements.
11	<b>Goal Name</b>	<b>NRSA - Railroad Island/Hamms</b>
	<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 2025 with CDBG, HOME, and ESG program funding. The Capital Improvement Budget Committee (CIB) recommended capital projects through the two-year 2024-2025 capital improvement budget process, see Attachments A and C.

#### Projects

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

**Table 56 – 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

1	<b>Project Name</b>	<b>Acquisition Activities</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Remediation of Substandard Properties
	<b>Needs Addressed</b>	Pre-development support, including lead-based paint abatement; acquisition, demolition, and clearance of property
	<b>Funding</b>	CDBG: \$220,000
	<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>	12/31/2026
	<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 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.
2	<b>Project Name</b>	<b>Clearance Activities</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Remediation of Substandard Properties
	<b>Needs Addressed</b>	Pre-development support, including lead-based paint abatement; acquisition, demolition, and clearance of property
	<b>Funding</b>	CDBG: \$140,000

	<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>	12/31/2026
	<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>	<b>Neighborhood Non-Profits</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Public services, including tenant and landlord education
	<b>Funding</b>	CDBG: \$83,000
	<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>	12/31/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 3,000 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.
4	<b>Project Name</b>	<b>Community Engagement</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Community Engagement
	<b>Needs Addressed</b>	Community outreach and engagement
	<b>Funding</b>	CDBG: \$345,000
	<b>Description</b>	The program provides funding for District Councils in Planning Districts 1-8, 11, and 17 for crime prevention, community outreach and development, and policy development activities. The program also receives City General Fund local funding.
	<b>Target Date</b>	12/31/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	CDBG funds will be used for activities in the CDBG-eligible areas of the city. Approximately 181,300 low- to moderate-income residents will be assisted with the CDBG funds. Local funding is available for non-CDBG eligible areas.
	<b>Location Description</b>	CDBG-eligible districts 1-8, 11, and 17.
<b>Planned Activities</b>	Crime prevention, community development, and policy development activities.	
5	<b>Project Name</b>	<b>Youth Employment</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Youth Employment
	<b>Needs Addressed</b>	Public services, including tenant and landlord education
	<b>Funding</b>	CDBG: \$540,000
	<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>	12/31/2026
	<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>6</b>	<b>Project Name</b>	<b>Housing Construction</b>
	<b>Target Area</b>	Citywide
	<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: \$220,000 HOME: \$1,566,843
	<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>	12/31/2026
	<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>7</b>	<b>Project Name</b>	<b>Single-Unit Rehabilitation</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Homeowner Housing Rehabilitation
	<b>Needs Addressed</b>	Support stable, affordable, and well-maintained homeownership

	<b>Funding</b>	CDBG: \$2,132,000
	<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>	12/31/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 50 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>8</b>	<b>Project Name</b>	<b>Multi-Unit Rehabilitation</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Rental Housing Rehabilitation
	<b>Needs Addressed</b>	Preservation of existing affordable housing
	<b>Funding</b>	CDBG: \$1,000,000
	<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>	12/31/2026
	<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>9</b>	<b>Project Name</b>	<b>Commercial Corridor and Citywide Economic Development</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Economic Development
	<b>Needs Addressed</b>	Economic development and job growth
	<b>Funding</b>	CDBG: \$365,000
	<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>	12/31/2026
	<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>10</b>	<b>Project Name</b>	<b>Public Facilities Activities</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Public Improvements
	<b>Needs Addressed</b>	Improve public infrastructure, city facilities, and community spaces
	<b>Funding</b>	CDBG: \$550,000
	<b>Description</b>	Citywide facilities improvements and activities for publicly owned or non-profit owned facilities 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>	12/31/2026

	<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>	Eligible projects 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>11</b>	<b>Project Name</b>	<b>ESG25SaintPaul</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Homeless Prevention
	<b>Needs Addressed</b>	Emergency shelters, unsheltered prevention and support services
	<b>Funding</b>	ESG: \$591,281
	<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>	12/31/2026
	<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>	Citywide
	<b>Planned Activities</b>	Activities include homeless prevention services, emergency shelters operating costs, essential services, street outreach, rapid re-housing, and ESG administration.
<b>12</b>	<b>Project Name</b>	<b>Planning and Administration</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Community Engagement
	<b>Needs Addressed</b>	Community planning needs

	<b>Funding</b>	CDBG: \$1,400,000 HOME: \$174,094
	<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>	This activity will indirectly benefit all low/moderate-income households citywide.
	<b>Location Description</b>	This activity will not benefit a physical location.
	<b>Planned Activities</b>	Funds are budgeted to pay salary and operating costs for overall administration and coordination of budget development, citizen participation, reporting, and compliance for Consolidated Plan grants. Staff includes Managers, Financial Analysts, Compliance Coordinators, IDIS Coordinator, and Administrative Support.
<b>12</b>	<b>Project Name</b>	<b>NRSA Railroad Island/Hamms</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Development of new housing
	<b>Needs Addressed</b>	Development of new affordable housing
	<b>Funding</b>	CDBG: \$5,000
	<b>Description</b>	Targeted activities related to work done within the boundaries of the NRSA serving Railroad Island/Hamms
	<b>Target Date</b>	12/31/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	TBD - specific projects will be assigned. We estimate 2 properties, at minimum will be assisted within the NRSA, but subrecipient contracting will determine exact amount of funds and homeowner housing units assisted.
	<b>Location Description</b>	Boundaries of this NRSA reflect the census tracts community of Railroad Island and adjacent Hamms redevelopment site



<b>Planned Activities</b>	Funds for subrecipients budgeted for CDBG activities in their service areas will be moved into the project to reflect location in the NRSA when applicable. One subrecipient selected through the CIB process undertakes several housing development related activities in the Railroad Island community and those activities will be tracked for NRSA reporting and a workplan developed in its subrecipient agreement.
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## **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 2025 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 2025-26 will have a service area that is located primarily in a shaded portion of the map.

Activities carried out by the City which provide a direct benefit (primarily housing activities) are available citywide to income eligible households, while direct benefit activities carried out by 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**

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

**Table 57 - 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	95
Special-Needs	0
Total	0

**Table 58 - 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	75
Acquisition of Existing Units	0
Total	0

**Table 59 - One Year Goals for Affordable Housing by Support Type**

#### Discussion

In 2025, 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 its citywide owner-occupied home rehab program as well as continuing to fund and work with its non-profit partners resulting in an estimated 50 owner-occupied homes rehabilitated – a strategic effort to preserve affordable housing. CDBG funding will also be available for the rehabilitation of existing affordable rental

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

### **Introduction**

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

The PHA owns and manages 418 public housing units and 3,836 units with Project-Based Rental Assistance (PBRA) that were converted from public housing via HUD's Rental Assistance Demonstration (RAD) effective January 1, 2020. The PHA also administers 5,243 Housing Choice Vouchers (as of January 2025). These include 175 Family Unification Program (FUP) vouchers, 318 Mainstream Program/Disability vouchers, 276 Veterans Affairs Supportive Housing (VASH) vouchers and 157 Emergency Housing Vouchers (EHV). PHA has allocated 864 project-based vouchers (PBVs); and more than half of those (510) are in supportive housing developments. In total, the PHA provides nearly 9,500 affordable homes to more than 21,000 people.

The Annual Agency Plan for Federal FY 2025 (PHA's Fiscal Year 2026, beginning April 1, 2025), and the Five-Year Capital Fund Plan are available on the PHA website at: <http://www.STPHA.org/>.

The PHA has maintained its High Performer status under HUD's Public Housing Assessment System (PHAS) for 32 consecutive years. The PHA does not administer HOPE VI activities or Mixed-Finance Modernization and Development. PHA has also maintained its High Performer status under HUD's Section 8 Management Assessment Program (SEMAP) for 23 consecutive years. The PHA 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 Saint Paul with their plans to end homelessness.

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

**Remaining Public Housing Program** – 418 scattered site single family homes and duplexes remain in the public housing program. The PHA is committed to preserving these homes as safe, affordable, quality housing for low-income families. The current PHA Annual Agency Plan notes that the PHA is exploring asset repositioning strategies for these homes to increase funding to preserve and maintain them as deeply affordable housing.

**Capital Improvements** – PHA 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. PHA 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 the PHA 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. PHA Board will consider staff’s recommendations for awarding more vouchers for PBV use.

In the coming year the PHA 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 18–24-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) – The PHA received EHV vouchers from HUD in 2021. Working with partner agencies, the PHA 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 cannot be reissued after 9/30/2023.

**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 4/21/2022 and closed 6/20/2022. As of 1/1/2025 there were 5,544 applicants on the Multifamily/PBRA waiting list for apartments in hi-rises and family townhome developments. The public housing waiting list (1,901 applicants) is for single family homes and duplexes. Even when waiting lists are closed, the PHA still accepts applications for 2 programs with special services in PHA-owned housing: Congregate Housing Services Program (CHSP) and the Wilder 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. The PHA expects the 1,200 to be served in 1-2 years. As of 1/1/2025, about 1,700 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. PHA 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**

The PHA'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 public 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 Saint Paul Public Housing Agency (PHA) Board of Commissioners has established the PHA'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 the PHA's Public Housing scattered site single family homes and duplexes.
- Two PHA Commissioners who are Public Housing residents – 1 Commissioner represents hi-rise residents, and 1 Commissioner represents family residents. RAB membership fluctuates due to changes residents moving out of public housing or leaving the Section 8 program, etc. RAB meeting agendas are sent to all RAB members and Southern Minnesota Regional Legal Services, Inc. (SMRLS).

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

**Section 3** - PHA provides economic opportunities for low-income residents, to the greatest extent feasible, by hiring qualified Section 3 PHA residents, contracting with Section 3 businesses, and including Section 3 requirements in all contracts. The PHA'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 PHA resident initiative which includes working with various departments and resident councils to identify new partnership opportunities and/or collaborations to encourage resident economic development and self-sufficiency.

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

## **provided or other assistance**

Not applicable.

In 2023 (the last year for which the PHA has received a score), the PHA earned HUD's High Performer rating for the 32nd consecutive year under HUD's Public Housing Assessment System (PHAS). SPPHA has also maintained HUD High Performer status under HUD's Section 8 Management Assessment Program (SEMAP) for 23 years.

## **Discussion**

The PHA has achieved High Performer status continuously for both its public housing and Section 8 Housing Choice Voucher Program.

The PHA has a continual need for stable Federal funding to maintain its high standards. As explained above, the PHA 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. The PHA'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 PHA-owned housing. This program simply shifts units from the Public Housing program to the PBRA program. The PHA'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 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 weekly with the homeless outreach teams including Breaking Free and People, Inc. The City and County partner with Metro Transit's Homeless Action Team 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 an Opportunity Center with wrap around services. Weekly street outreach activities include locations such as the George Latimer and Rondo libraries, and the Opportunity Center. The St. Paul Residence continues to provide permanent supportive housing for low-income, long-term homeless adults, using the Housing First 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 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 and 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, 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 SPPHA'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 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 department and other prevention resources such as the Minnesota Housing Prevention and Assistance (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 Coordinated Entry Sub-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 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 than other subpopulations of 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 Joint Powers Agreement 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 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 emergency shelters which target single adults. Basic needs and advocacy services are provided. The shelters are located close to Catholic Charities' St. Paul Opportunity Center, which provides residents with easy access to daily meals, County resources, on-sight 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, transportation assistance, 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 Homeless Action Team, and 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 that 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 emergency assistance, 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 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 Family Homeless Prevention and Assistance (FHPAP) program also funds 12 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. On-going 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 in funding across the CoC area is beneficial to Saint Paul residents and meets the priority needs identified in this plan for homeless prevention, rapid rehousing 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 2023. Other means used to determine the number of homeless and identify the areas of greatest need are 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 household 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 costs and lack of funding 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 and insufficient allocation of LIHTCs 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. The City's LIHTC allocation also continues to shrink.

### **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**

There are about 18,000 publicly assisted affordable housing units within Saint Paul; roughly 9,400 are subsidized through the PHA. The City finances preservation, rehabilitation and construction of affordable housing citywide using city-owned and discounted County-owned land and local, state, and federal funds and financing tools - LIHTCs, Federal and State Historic Preservation Tax Credits, and issuing Housing Revenue bonds.

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 requiring a minimum number of 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 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.

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.

In the past two 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. 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.

Affordable housing is an important element of redevelopment with City investment in infrastructure. 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.

**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 2024, 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 2025, the City will continue to use the majority of its CDBG funding and all its HOME funding for affordable housing activities. Projects and programs that provide assistance for homebuyers, homeowner rehabilitation, rental rehabilitation, and new construction of affordable housing will be carried out by the City, its sub-grantees, non-profit and for-profit partners. Descriptions of the specific

projects and programs can be found in the AP-38 Project Summary section of this document. 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.

The 2040 Comprehensive Plan supports affordable housing development. Affordable housing priorities are preservation and production of rental housing affordable for those at or below 30% of AMI; create homeownership opportunities for households with low- and moderate-incomes; housing preservation for low-income elderly homeowners between 0-50% of AMI; and provide housing for special needs populations. Policy H-32 states “Continue to use City/HRA resources to support affordable rental housing citywide with at least 30 percent of the total rental units (both market-rate and affordable) financially assisted by the City/HRA being affordable to households earning 60 percent or less of AMI with at least: 10% of all units being affordable to households earning 30% of AMI; 10% of all units being affordable to households earning 50% of AMI; and 10% of all units being affordable to households earning 60% of AMI.”

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 encourage a more equitable 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 mended its scoring structure for LIHTC applicants to provide added points to projects that provide housing targeted to residents earning no more than 30% AMI.

Emergency Rental Assistance – the program will provide up to a month rent assistance or \$2,500 to households with verifiable emergency needs due to a pending eviction when other services or funds are unavailable.

Community Land Trust Pilot – Saint Paul has dedicated HTF funds to community land trusts to provide new pathways to homeownership for low- and moderate-income households and to promote long-term

affordable community ownership.

Downpayment Assistance and Homeowner Rehabilitation Programs – With Housing Trust Fund and CDBG funds, respectively the City provides low- and moderate-income homebuyers and homeowners 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**

Critical to reducing poverty is workforce development and skills training and access to economic opportunity. 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.

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 City of Saint Paul's Section 3 Program gives metro area 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 of the cities of Saint Paul and Minneapolis, Minneapolis Public Housing Authority, Ramsey, Hennepin and Anoka Counties and Community Development Agencies of Washington and Dakota Counties.

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.

Minimum Wage Ordinance – sets the lowest hourly pay rate for work done in Saint Paul. The minimum wage varies based on a business's size and increases in phases. The City will require businesses of all sizes to pay their employees a minimum wage of \$15 an hour by 2027.

Office of Financial Empowerment - Saint Paul established the Office of Financial Empowerment (OFE) in 2019 because economic inequality is a whole-city crisis that demands a whole-city response. OFE is working deliberately to help a new generation of Saint Paul residents repair those generational injustices and build equitable economic power for decades to come.

- OFE welcomes every new baby to our city with \$50 in a college savings account — a small but powerful investment in each child’s boundless potential — through the CollegeBound Saint Paul program. CollegeBound also provides opportunities for families to grow the account and earn bonus deposits through engaging in the program or completing activities related to the development of their child or their family’s financial stability.
- OFE leads the City’s strategy around guaranteed income which provides monthly unrestricted cash to eligible families with children with CollegeBound accounts. The People’s Prosperity Pilot provided 150 families with \$500 a month for 18 months, and research results showed positive trends in employment, physical and mental health, and other indicators of well-being and quality of life. The current program CollegeBound Boost provides 333 families with \$500 for 24 months.
- OFE oversees the Medical Debt Reset Initiative, which is a partnership with national nonprofit Undue Medical Debt to acquire and cancel an estimated \$110 million in medical debt for Saint Paul residents. Medical debt poses a large financial burden for many individuals and families, and by easing this burden, the City helps residents build health and wealth in their communities.
- OFE manages the LOCAL Fund which uses shared ownership models to build local economic wealth among Saint Paul residents and small businesses. The LOCAL Fund aims to achieve healthy and sustainable neighborhoods through recovery of vacant and abandoned properties and to mitigate the enduring economic impacts of the pandemic on small businesses.

Open for Business – a one-stop shop for start-up and existing businesses to get information and leverage resources. The program provides a pocket guide (in several languages) to starting a business in Saint Paul; connection with information and resources to start, move or expand a business; and help from a Business Project Facilitator as a guide through the permitting and licensing process of opening, expanding or moving to the City.

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

Saint Paul’s institutional structure gives the City the opportunity to partner with many

organizations. In 2025, 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.

There remains a sustained focus across Mayoral administrations to address racial inequities. OFE has developed a framework for a citywide fair housing strategy and will be revisiting that framework to build out the strategy components, including use of the AI findings. The City has developed initiatives for each department to identify goals for their workforce, programs, services, and community impact that expand and improve racial representation and cultural

understanding.

### **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 2025. 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 received funding allocations of \$6,765,326 for CDBG, \$1,534,711 in HOME funding and \$591,281 in ESG funding from HUD in 2024 and expects to receive similar amounts in 2025, but exact amounts are unknown at time of draft publication. In addition, the City estimates using about \$235,000 in CDBG program income and approximately \$206,225 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 2025 were not yet passed upon 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 will be adjusted in direct proportion to the difference in actual allocations and Program Income may be re-evaluated.

A consecutive period of three years, 2023, 2024 and 2025, 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	234,674
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>234,674</b>

**Other CDBG Requirements**

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

**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.

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.

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 non-profit 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 and Evaluation Analyst 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 includes 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.

## Appendix - Alternate/Local Data Sources

1	<b>Data Source Name</b> Ramsey County CoC
	<b>List the name of the organization or individual who originated the data set.</b> Ramsey County CoC and Ramsey County Health and Wellness Administration’s Research and Evaluation
	<b>Provide a brief summary of the data set.</b> This data came from Ramsey County CoC through their 2023 Point-in-Time survey.
	<b>What was the purpose for developing this data set?</b> The point-in-time surveys and the annual HUD System Performance Measures are required by HUD. The Coordinated Access reports are required by HUD and Ramsey County CoC.
	<b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b> The data is comprehensive for Ramsey County.
	<b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b> Point-in-Time survey covers January 25, 2023.
	<b>What is the status of the data set (complete, in progress, or planned)?</b> Complete.
2	<b>Data Source Name</b> Vacant Properties
	<b>List the name of the organization or individual who originated the data set.</b> City of Saint Paul Vacant Building List, Saint Paul Open Information Portal
	<b>Provide a brief summary of the data set.</b> Vacant buildings (category 0 - 3)
	<b>What was the purpose for developing this data set?</b> Maintain list of vacant buildings for code enforcement.
	<b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b> Comprehensive, city-wide.

	<p><b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b></p> <p>Number of vacant units as of 12/27/2024.</p>
	<p><b>What is the status of the data set (complete, in progress, or planned)?</b></p> <p>Complete</p>

ATTACHMENTS:

- A. CIB minutes from August
- B. Concentrations of Disproportionate Need
- C. CIB recommendations
- D. CDBG-Eligible Census Tracts
- E. ESG Program Manual
- F. Comments from the Public Comment Period and minutes from April 27, 2025, Public Hearing (TBD)

# SAINT PAUL LONG-RANGE CAPITAL IMPROVEMENT BUDGET COMMITTEE MEETING MINUTES

Monday, Monday, August 12, 2024, 5:00 – 7:00 pm | Rondo Community Library

- I. Call to Order at 5:10 by Chair Tobolt  
Roll Call
  - a. Members in attendance: Lauren Dees-Erikson, Raymond Hess, Robert (Brian) Jackson, Pat McQuillan, Carl Johnson, Demetrius Shaw, Darren Tobolt, Pang Yang
  - b. Members excused: Makayla Cox
  - c. Members Absent: William (Liam) O'Brien
  - d. City Staff and Community Members in Attendance: Nichelle Bottko Woods, Shannon Forney, Neal Younghans, Shane Wurst - Office of Financial Services; Anne Weber- Parks and Recreation; Jeramiah Melquist, Jill LaCasse, Jamie Smith – Saint Paul Fire Department; Jane McClure - Villager / Monitor; Ellie Beaver, Matt Beaver, Tom Bowman, Jenna Bowman, Stephen Katz, Stephanie Pinkalla, Kevin Dahlin, Meg Duhr – Community Members.
- II. Approval of Meeting Agenda: Hess moved to approve the agenda, Dees-Erikson seconded, motion passed.
- III. Approval of July 22 Meeting Minutes: Johnson moved to approve the minutes, Hess seconded, motion passed.
- IV. Budget Amendments
  - a. **RES PH 24-179 Fleet Roof Contingency** – Nichelle Bottko Woods recapped Shane Wurst's July presentation on Fleet budget resolution. Shane Wurst from OFS Fleet described that this project is to repair the roof at the 891 Dale Street Public Works municipal garage and PW campus. The roof is 40 years old. The project was originally approved by the CIB in 2021 but was delayed due to supply chain stresses and existing roof solar panels that made access difficult. The project has returned to an active state and PW procured 5 contractor bids that were all considerably more than the original budgeted amount. PW is requesting additional funds from contingency to complete the project.  
Nichelle Bottko Woods explained that contingency funds would come from eldest CIB contingency amounts from 2022 for this project, of which there is \$1,202,994 available. She also explained that CIB projects of this nature were expected to be completed within 5 years, as it concurs with the 5 year bond terms that support these projects. Hess moved and Shaw seconded to recommend approval of the motion.  
Motion Passed
  - b. **RES PH 24-178: Sale of GO CIB Bonds** - Neal Younghans of OFS Treasury, presented the budget amendment resolution for Treasury to reflect the sale of G.O. Capital Improvement Bonds and G.O. Street Reconstruction Bonds, allowing existing debt to



# SAINT PAUL LONG-RANGE CAPITAL IMPROVEMENT BUDGET COMMITTEE MEETING MINUTES

Monday, Monday, August 12, 2024, 5:00 – 7:00 pm | Rondo Community Library

be paid earlier. Hess moved and Shaw seconded to recommend approval of the motion. Motion Passed

- c. **RES PH 24-203 Fire Station 7 Funding** -Assistant SPFD Fire Chief Melquist presented on the budget amendment to increase funding from bonds and federal earmark for the construction of new Fire Station 7. Hess moved and Yang seconded to recommend approval of the motion. Motion Passed
  - d. Public Works Budget Amendments -Anne Weber from Public Works presented on the following budget amendments:
    - i. **RES PH 24-194 2024 Bicycle Facility** -Transferring designated funding from the General Fund to the 2024 Bicycle Facility Improvements Program. Yang moved and Dees-Erickson seconded to recommend approval of the motion. Motion Passed
    - ii. **RES PH 24-195 Downtown Paver Replacement Project** - Using CIB bond interest income to replace pavers in the downtown. Hess moved and Johnson seconded to recommend approval of the motion. Motion Passed
    - iii. **RES PH 24-196 Fourth and St. Peter** - Amending the financing and spending plans for the Fourth and St. Peter Pedestrian Improvement, Kellogg/Third Bridge, Shepard Road Bridge near Otto and the West Side Pedestrian Improvement Projects. Dees-Erickson moved and Johnson seconded to recommend approval of the motion. Motion Passed
- V. Public Hearing: 2024 – 2024 Community Proposals
- Chair Tobolt invited community members to use the sign in sheet at the back of the room to signal their interest in speaking. Speakers were limited to two minutes each, and provided the following testimony:
- a. Ellie Beaver - represented the proposal for traffic calming on Jefferson Avenue in the West 7<sup>th</sup> Neighborhood. She lives near the specified intersection and has noticed increased volume and speed of traffic. She has witnessed multiple crashes and more near misses. Curb improvements have been made, but additional traffic calming measures are needed. She testified to finding the Community Proposal process confusing and overwhelming and was disappointed by the high dollar amount of the cost estimate. The group would like to find other ways to address the need, if this proposal isn't successful. However, many neighbors have already invested time and resources in the CIB Community Proposal process already.

# SAINT PAUL LONG-RANGE CAPITAL IMPROVEMENT BUDGET COMMITTEE MEETING MINUTES

Monday, Monday, August 12, 2024, 5:00 – 7:00 pm | Rondo Community Library

- b. Kevin Dahler - represented the proposal for traffic calming at Thomas and Griggs, which was supported by the Hamline Midway Coalition. He restated that traffic calming is critical to neighborhood safety and advocated again for the project.
- c. Meg Duhr spoke on behalf of the West 7<sup>th</sup>/Fort Road Federation. She described that the Community Proposal Process was confusing and redundant, and that the cost estimate was incredibly high at 1.5 million dollars. She described that her group put in the work for badly needed traffic calming, which was time intensive, while some of the projects recommended for funding don't seem as critical to public safety. She described the poll rankings as being very confusing and raised concerns about the transparency and accountability of the CIB score and ranking processes.
- d. Jenna Bowman spoke to the traffic calming proposal on Jefferson Avenue. She agreed with previous speakers about the critical need for improved safety, as she described cars doing rolling stops on the avenue. She also described frustration with the Community Proposal process.

Chair Tobolt ensured all community members who were interested had the opportunity to speak. He then closed the public hearing portion of the meeting with some final observations about the Community Proposal Process. He acknowledged that many proposals for this process were specifically targeted to increase pedestrian safety, and that it merits examination whether a competitive process is the best way to go about these safety improvements. He also acknowledged the frustrations applicants had with the process and committed to improving the process and communications with applicants.

## VI. New Business

- a. Community Proposal Funding History and Polls -Nichelle Bottko Woods describes the Community proposal rankings, scores and poll data. Out of 28 Community Proposals, 7 were tentatively recommended for available funding based on the highest-ranking proposals. There was discussion about the degree to which the polling of projects informs the rankings of the projects, and the CIB committee scores are the primary scores by which the rankings are created.
- b. 2024 – 2025 Community Proposal Recommendation - Chair Tobolt reminded the committee that the 2024-2025 Community Proposal Recommendations required a final discussion and vote. He presented the 2024-2025 Community Proposals in order of rank by highest to lowest scores. Discussion followed about urgent safety needs,

# **SAINT PAUL LONG-RANGE CAPITAL IMPROVEMENT BUDGET COMMITTEE MEETING MINUTES**

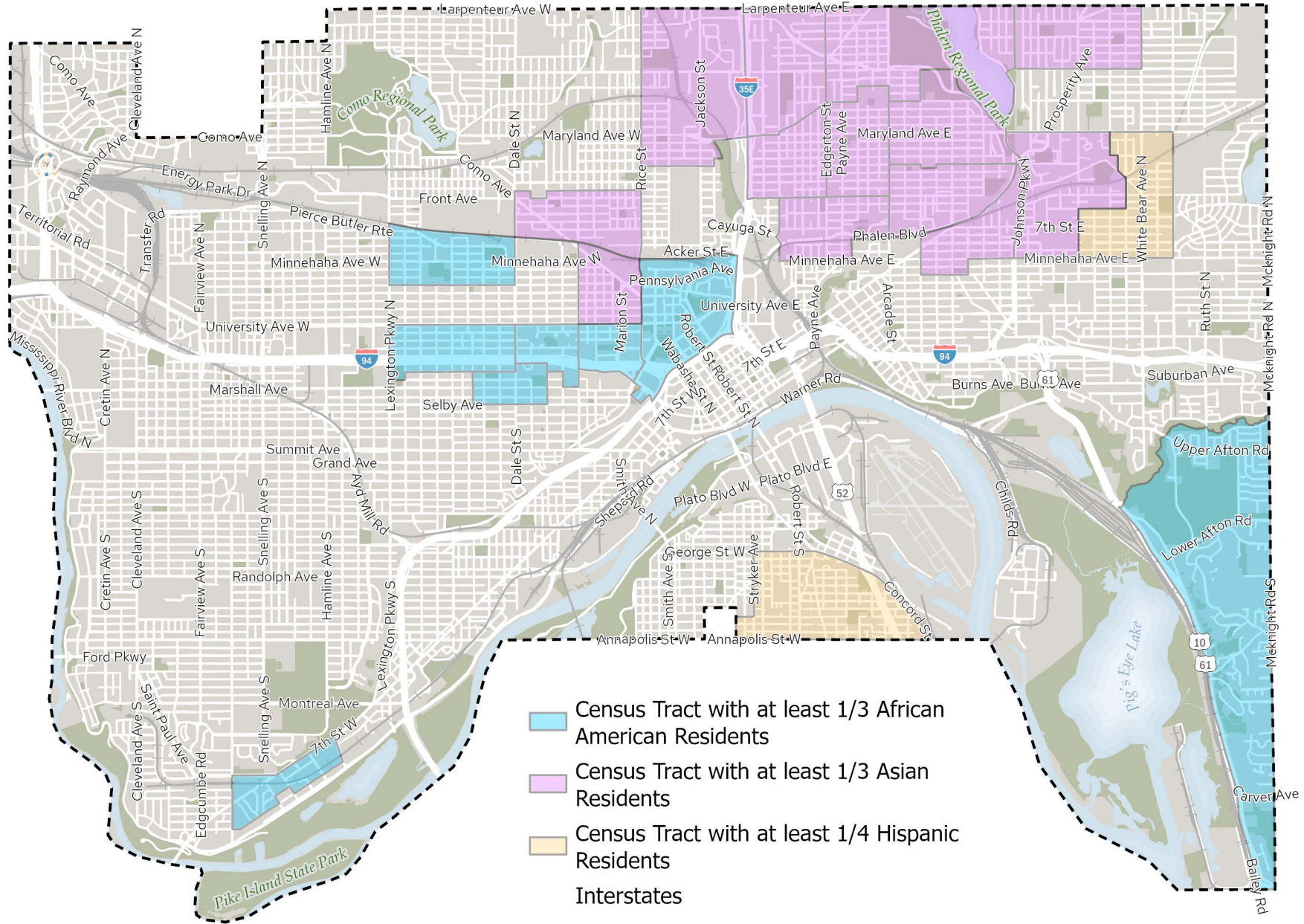
Monday, Monday, August 12, 2024, 5:00 – 7:00 pm | Rondo Community Library

specifically around pedestrian safety, as a significant theme in many of the proposals. A point was raised that the recommended funding for the Mounds Park Restoration project was already significantly less than the project costing indicated, and that perhaps those funds were more strategically used by directing funds to the traffic calming at Jefferson Avenue project, even though it scored lower. Tolbolt made the motion to remove the Mounds Park Restoration project from the recommended list and replace it with the Jefferson Ave project. McQuillan seconded. Motion passes. A motion to send the amended 2024-2025 Community Proposal Recommendations to the Mayor was made by Hess and seconded by Dees-Erickson. Motion passes.

- VII. Announcements
  - a. Next Meeting: Monday, September 9, 2024 Rondo Community Library
- VIII. Meeting Adjourned at 6:58pm

# Concentrations of Disproportionately Greater Need Subpopulations

Developed in January 2025



DATA CREDITS: St. Paul Enterprise GIS; Parcel Polygons: current Ramsey County data via Minnesota Geospatial Commons; Road and Building Polygons: 2017 impervious surface dataset, Ramsey County; Water bodies via Minnesota DNR. • LIMITATIONS ON USE: This document was prepared by the Saint Paul Planning and Economic Development Department and is intended to be used for reference and illustrative purposes only. This drawing is not a legally recorded plan, survey, official tax map or engineering schematic and is not intended to be used as such. • DATE: 1/14/2025 3:37 PM • DOCUMENT PATH: C:\Users\jiegwore\OneDrive - City of Saint Paul\Documents\GIS PRO ONEDRIVE\Con Plan\NA-30 Disprapr



## 2024 - 2025 City of Saint Paul Community Proposals

as recommended by CIB Committee on 7/22/2024

### Recommended for Funding This Cycle by CIB Committee

Project Title:	Requested	Recommended	Department	Ward(s):	Neighborhood District Council(s):
Improve Safety near Skyline Tower and Midway Peace Park	\$ 65,000	\$ 65,000	Public Works	Ward 1	Union Park
Mounds Park Restoration	\$ 670,000	\$ 102,153	Parks	Ward 7	Dayton's Bluff
Park Street Traffic Safety Improvements	\$ 225,000	\$ 225,000	Public Works	Ward 1, Ward 5	North End
Resurfacing of Basketball Courts at Highwood Hills	\$ 172,847	\$ 172,847	Parks	Ward 7	D1 Southeast Community Organization
Traffic Calming at the intersection of Thomas Avenue and Griggs Street	\$ 225,000	\$ 225,000	Public Works	Ward 4	Hamline-Midway
Upgrade and replace Poor lighting in Dayton's Bluff	\$ 150,000	\$ 150,000	Public Works	Ward 7	Dayton's Bluff
1% Public Art Allocation	\$ 10,000	\$ 10,000	-	-	-
Contingency	\$ 50,000	\$ 50,000	-	-	-
<b>Total</b>	<b>\$ 1,567,847</b>	<b>\$ 1,000,000</b>			

### Not Recommended for Funding This Cycle

Project Title:	Requested	Recommended	Department	Ward(s):	Neighborhood District Council(s):
Double street lighting at intersections	\$ 10,000	\$ -	Public Works	Ward 1	Citywide
Streetscapes for a Safer Selby	\$ 160,000	\$ -	Public Works	Ward 1	Summit-University
Pedestrian Safety at Maryland and Furness Parkway	\$ 210,000	\$ -	Public Works	Ward 6	Greater East Side
Intersection Daylighting for Pedestrian Safety	\$ 90,000	\$ -	Public Works	Ward 3	Citywide
Horton Park Plaza	\$ 361,850	\$ -	Parks	Ward 4	Hamline-Midway
Welcome To the East Side Signage	\$ 350,000	\$ -	OFS	Ward 7	Dayton's Bluff, Greater East Side
Solar Lighting along the Sam Morgan Trail	\$ 519,439	\$ -	Parks	Ward 3	Highland
Greater East Side Dog Park	\$ 215,767	\$ -	Parks	Ward 6	Greater East Side
Robbins/Transitway Lighting & Access Improvements	\$ 70,000	\$ -	Public Works	Ward 4	St. Anthony Park
Funding for bike parking, particularly at city schools, parks and playgrounds	\$ 47,593	\$ -	Parks	Citywide	Citywide
Pedestrian Crossing Light Cretin and Highland Parkway	\$ 50,000	\$ -	Public Works	Ward 3	Highland
Meeting the urgent need for traffic calming on Jefferson Avenue in the West 7th Neighborhood	\$ 120,000	\$ -	Public Works	Ward 2	West 7th / Fort Road
Path Repair at Marydale Park	\$ 306,567	\$ -	Parks	Ward 5	North End
Safe Crossing to Ayd Mill Trail at Hamline and Ashland Avenue	\$ 300,000	\$ -	Public Works	Ward 1	Union Park
Add Diagonal Diverter to East Sixth Street at Bates Ave or Maria Ave	\$ 190,000	\$ -	Public Works	Ward 7	Dayton's Bluff
Mississippi River Blvd. Bike Path Safety Enhancement	\$ 238,629	\$ -	Parks	Ward 3	Highland
Westgate Commons Park - Multi-Panel Shade Structures	\$ 302,966	\$ -	Parks	Ward 4	St. Anthony Park
Pedestrian-Activated Crossing Lights at Cretin and Selby	\$ 100,000	\$ -	Public Works	Ward 4	Union Park
Bicycle Route Connection	\$ 105,000	\$ -	Public Works	Ward 4	Hamline-Midway
Median at Fairview/Princeton	\$ 150,000	\$ -	Public Works	Ward 3	Macalester-Groveland
Family-Friendly Park at Underutilized Greenspace at Summit and Syndicate	\$ 163,231	\$ -	Parks	Ward 1	Union Park
<b>Total</b>	<b>\$ 4,061,043</b>	<b>\$ -</b>			

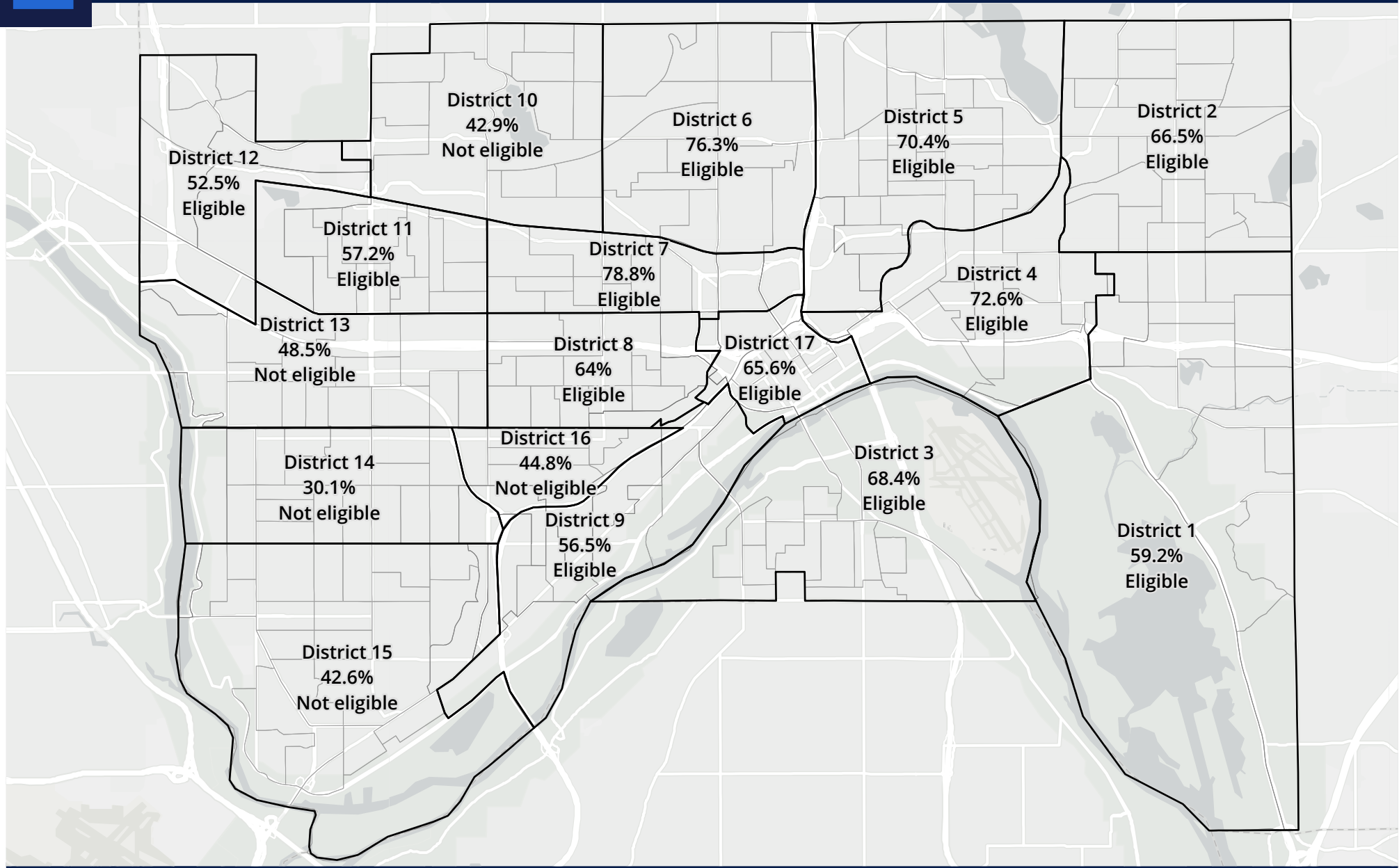




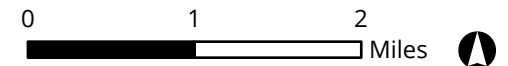
# CBDG Eligibility Analysis for Saint Paul Planning Districts

Eligibility determined by block group

January 4, 2023



□ Planning Districts  
□ Block groups



# Emergency Solutions Grant (ESG) Program Manual

## Ramsey County Housing Stability Department

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August 2021, modified October 2024

October 2024 Updates in Red throughout document

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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

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

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)

- 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 Policies 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



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.

- 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

- 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

- 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

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

- 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.



- **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.

### **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:**

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:

- (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.

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## 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

### 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).

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:

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

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),



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.

- 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.

## **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**

- 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

- 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

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

- 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.

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



- 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.

## 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

- 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

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.

**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:

- 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.

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.



- **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.

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 be 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).

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**

- 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

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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## **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.



## Review Outline

Responsibility	Outline
County Subrecipient	<ol style="list-style-type: none"><li data-bbox="456 296 1328 323">1. Open the Administrative Review by stating its purpose and scope; and</li><li data-bbox="456 327 1409 390">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="456 411 1146 438">1. Explain why the Administrative Review was requested.</li></ol>

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.

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.

## 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

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.

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## 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.

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**

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.



- 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.

**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.

**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

- 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

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

- 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**

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

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



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,

- 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.

**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

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

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-

- 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.

- 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:**

- 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



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

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.

- 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

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.

- 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.

- 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:



- 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.

- 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.

- 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

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;

- 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.

**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**

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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 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,

- 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.

**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.

---

**Homelessness Prevention Category 4 Fleeing/Attempting to Flee Domestic Violence**

---

**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.



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.

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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**

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.

### 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.

**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:**  
\_\_\_\_\_

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
<b>4.02</b>	Income and Sources	X	X	X	X	X
<b>4.03</b>	Non-Cash Benefits	X	X	X	X	X
<b>4.04</b>	Health Insurance	X	X	X	X	X
<b>4.05</b>	Physical Disability	X	X	X	X	X
<b>4.06</b>	Developmental Disability	X	X	X	X	X
<b>4.07</b>	Chronic Health Condition	X	X	X	X	X
<b>4.08</b>	HIV/AIDS	X	X	X	X	X

<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

## 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.



RESERVED

Attachment B: Public Hearing Minutes/Comments

**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*

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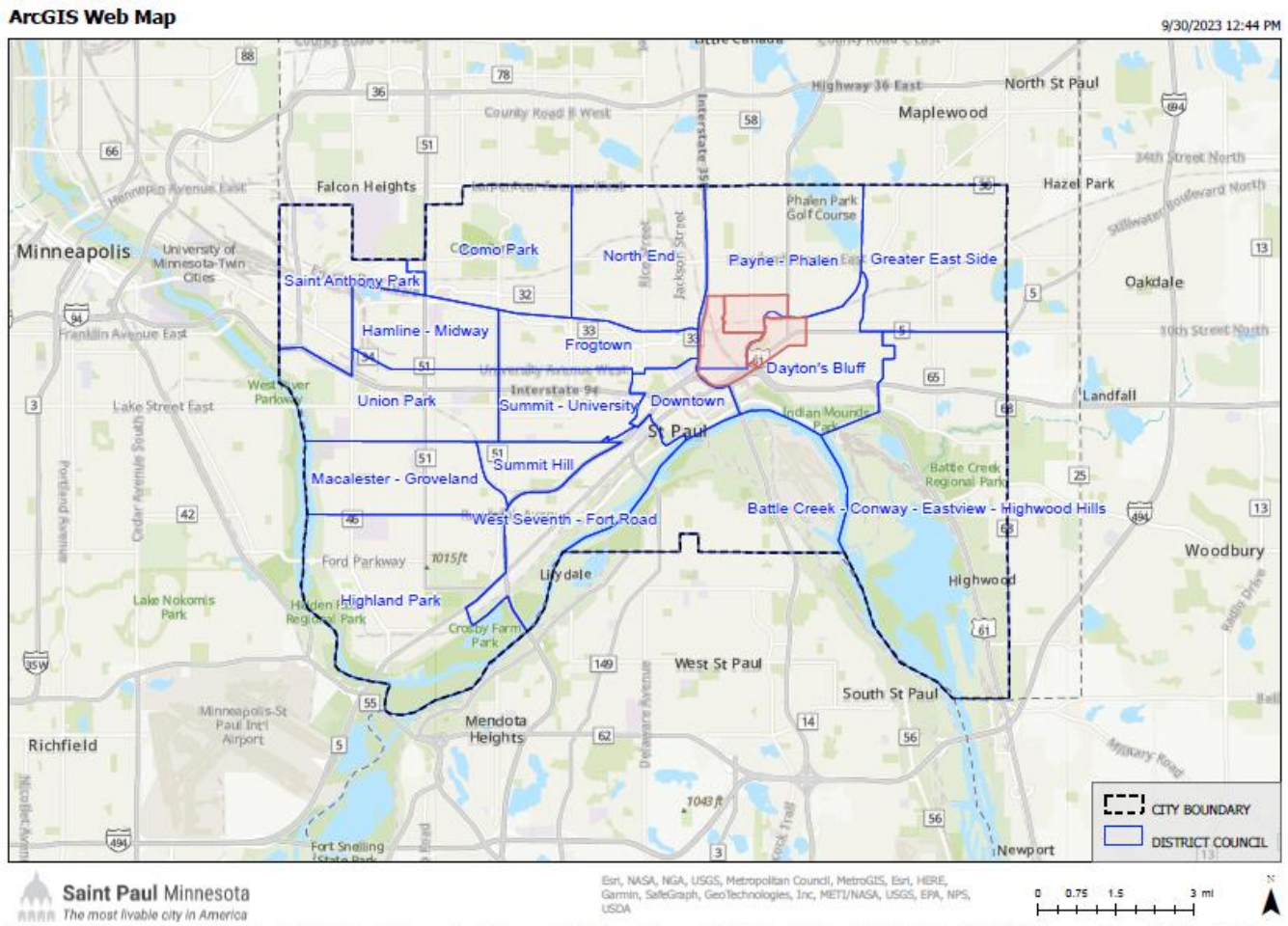
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# Introduction



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

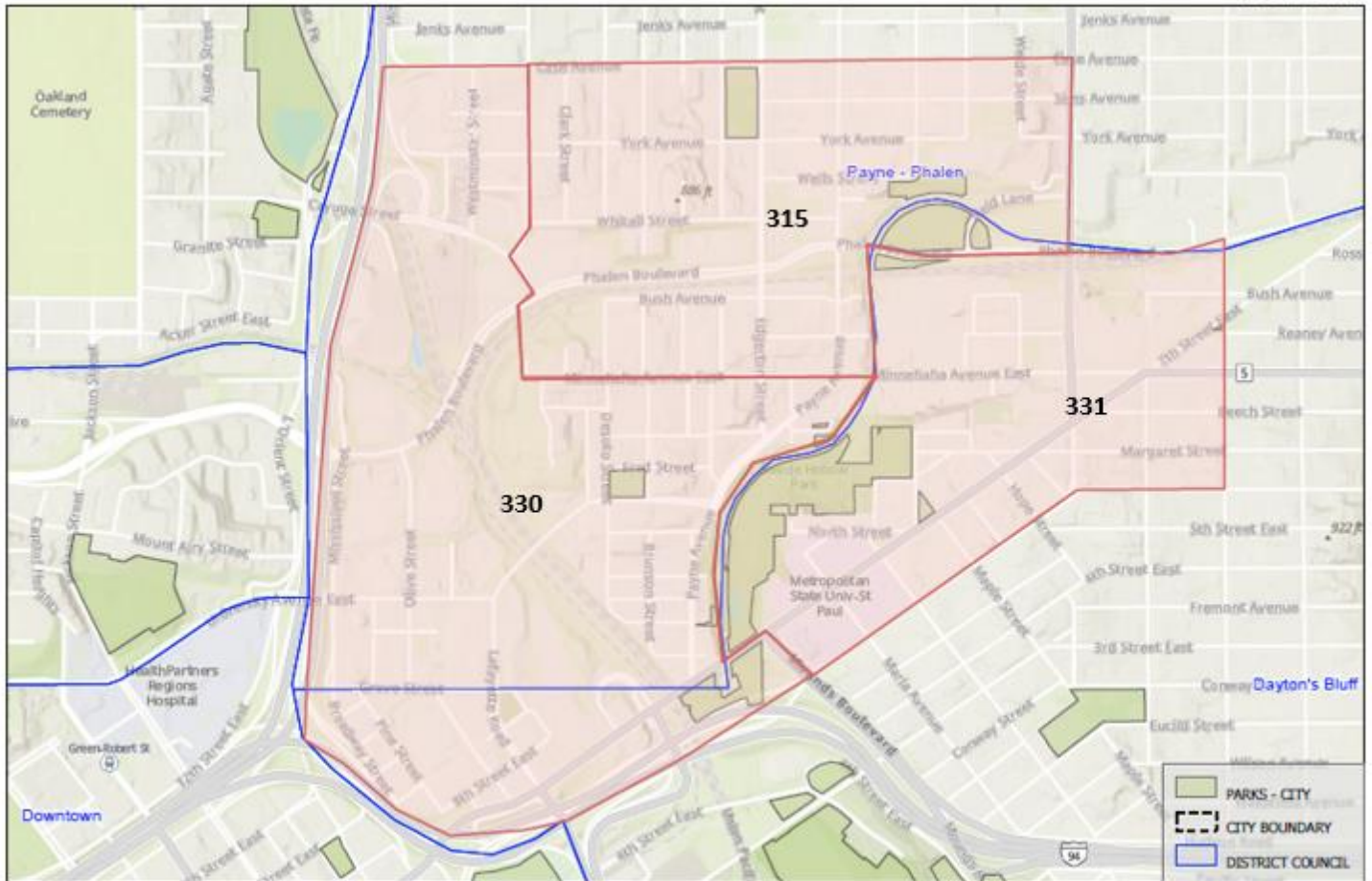
# Boundaries - Railroad Island Strategy Area

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

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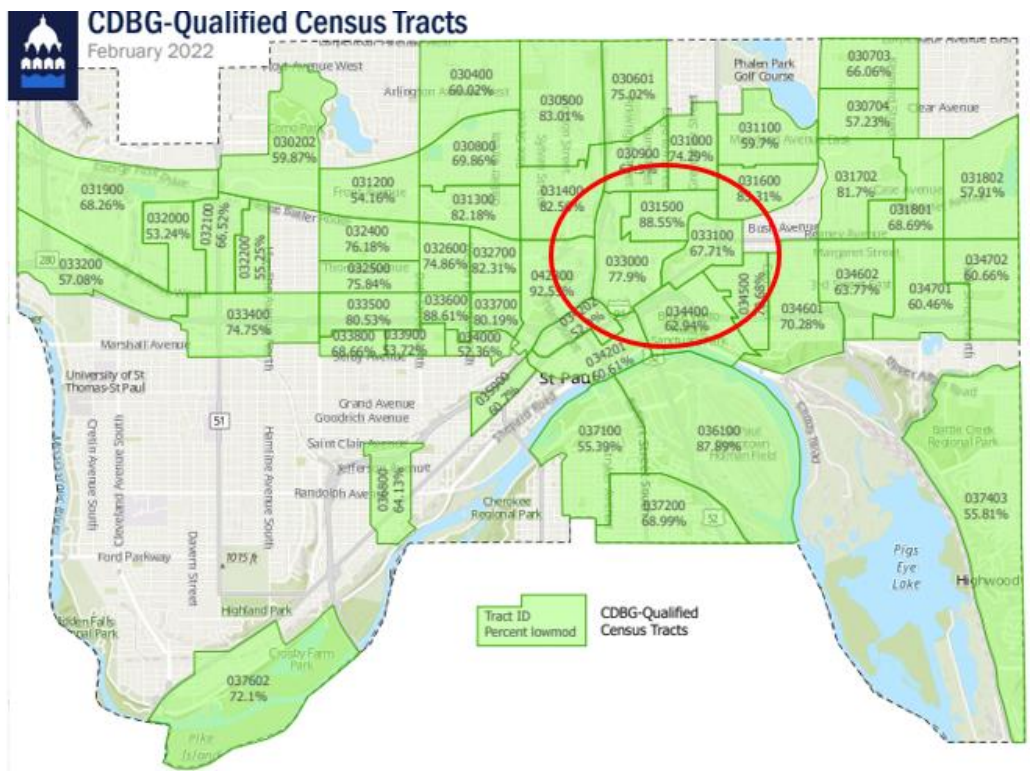




# Demographic Criteria

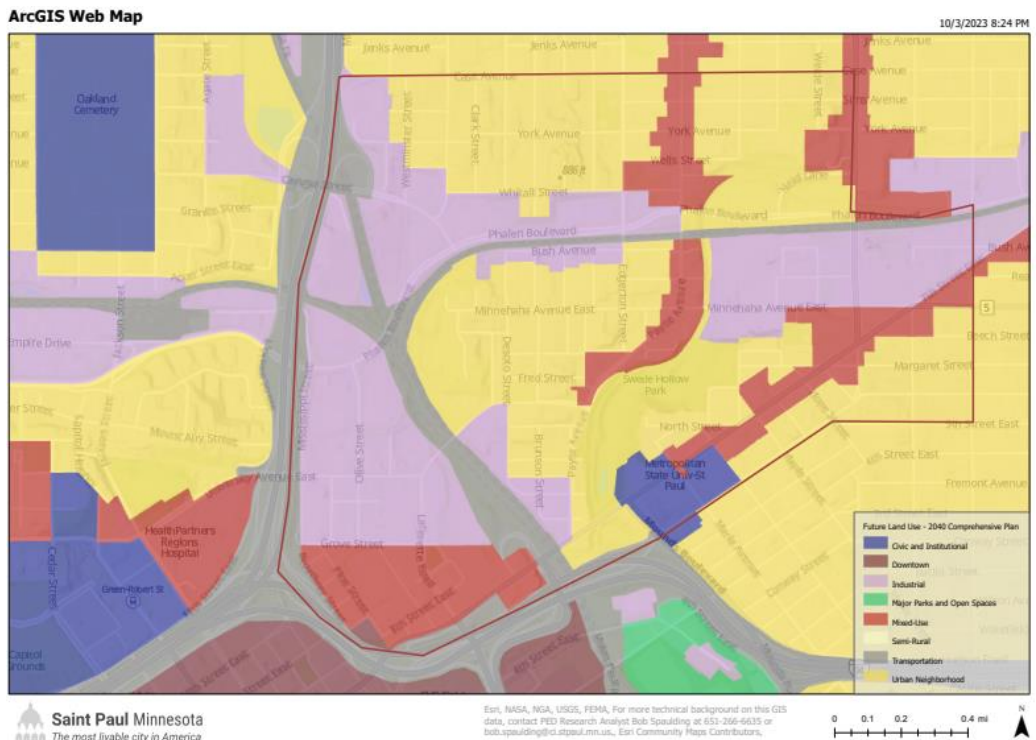
## Income CDBG-Qualified Census Tracts

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



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# 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

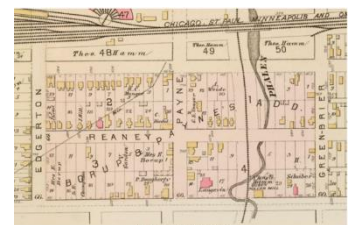
## History

### 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 over looking 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.

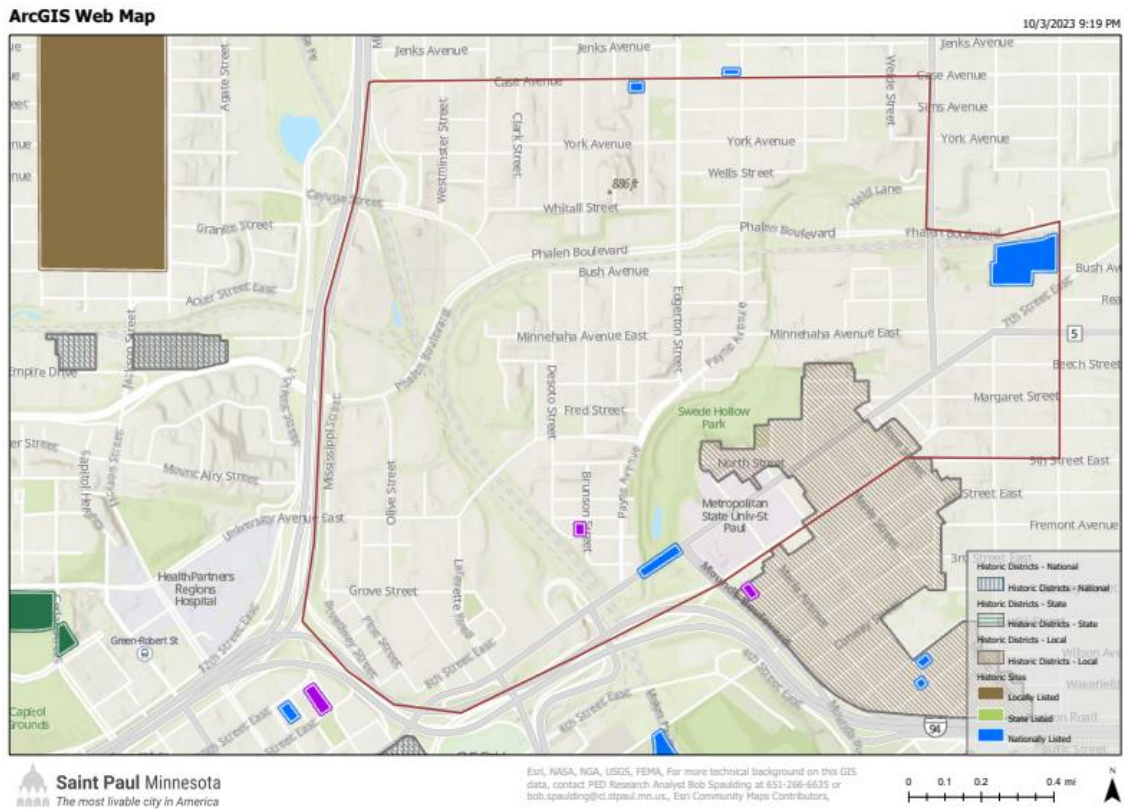
## Historic District and Sites

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

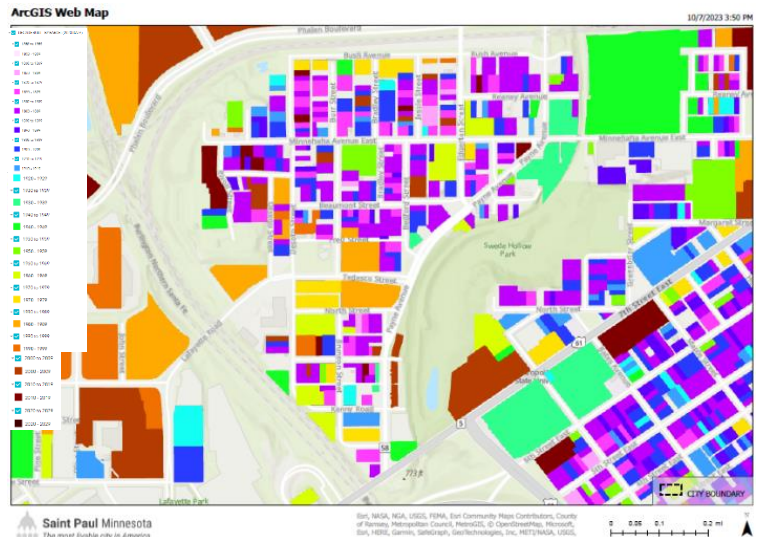
The table shows 2010 and 2020 housing unit occupancy and tenure. The data reveals that the number of rental units in the Railroad Island neighborhood decreased (-20%) from 2010-2020. Housing vacancy rate decreased (-7%).

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

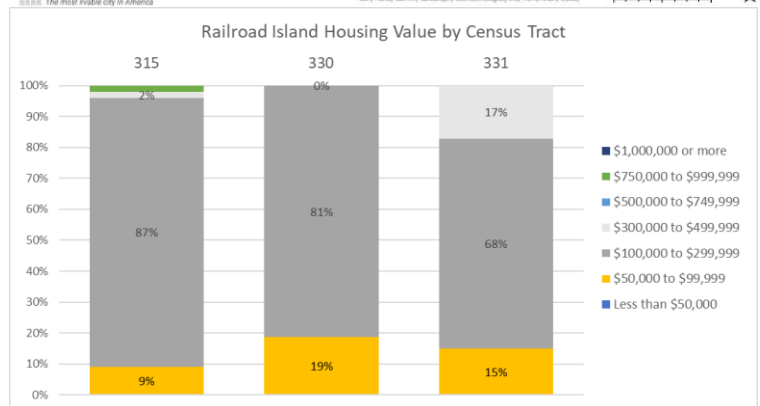
### Housing Age

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.

### 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

### Railroad Island Area Employers Summary

#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>	<b>415</b>
No Answer Provided	25
<b>Total</b>	<b>440</b>

Source: City of Saint Paul



### 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.

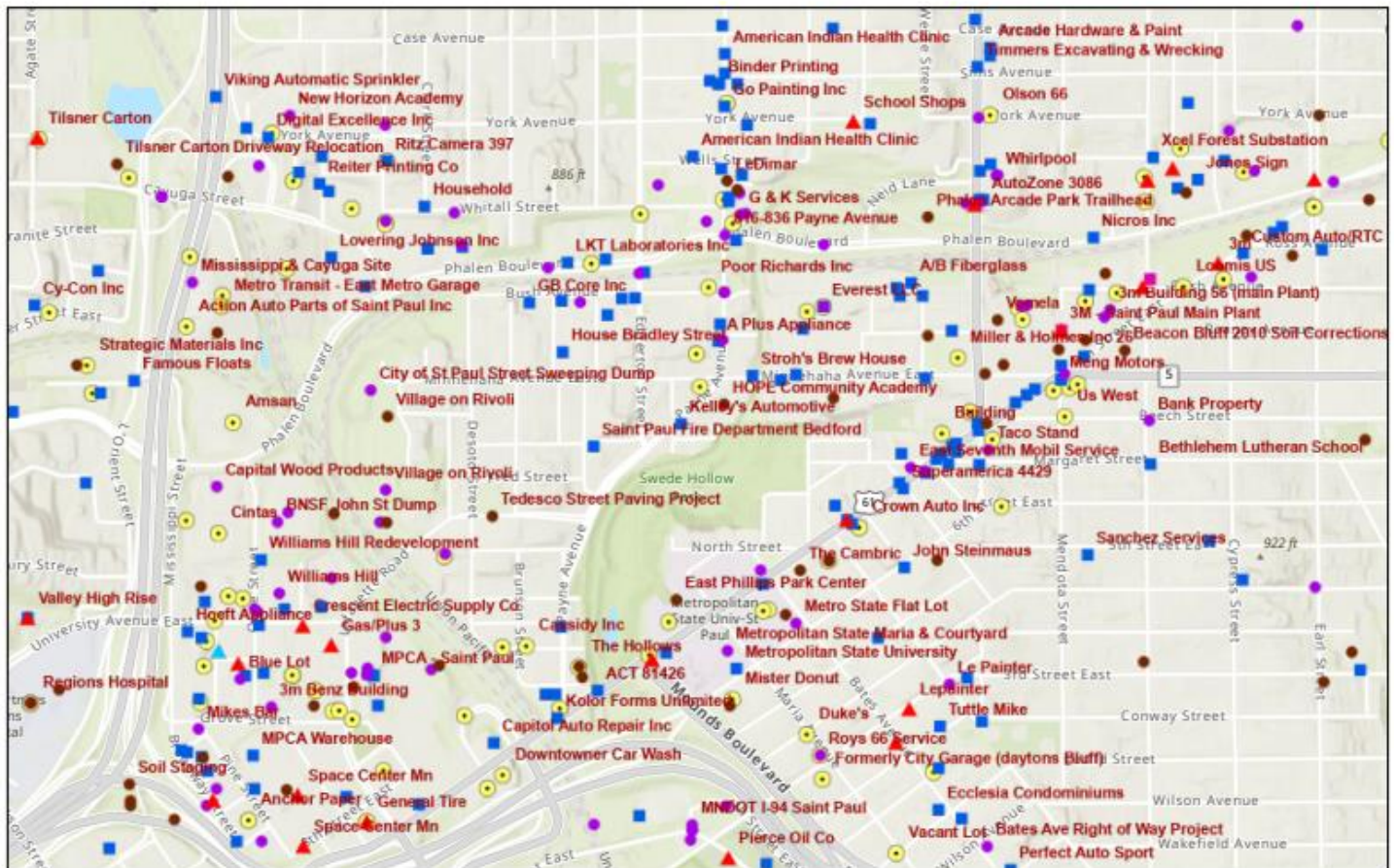
Railroad Island Major Employers	
Minnesota Business Name	Number Employees
1 Advantage Plus, L.L.C.	Over 500 employees
2 Culture Home Healthcare Incorporated	201 to 500 employees
3 Anchor Paper Company	51 to 200 employees
4 CLUES Real Estate Holding Company	51 to 200 employees
5 Comunidades Latinas Unidas 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 Chew Association Inc.	6 to 50 employees
38 Ndot 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	<span style="color: blue;">■</span> Hazardous Waste	<span style="color: red;">▲</span> Tanks
<span style="color: yellow;">●</span> Multiple Programs	<span style="color: purple;">●</span> Investigation and Cleanup	<span style="color: cyan;">▲</span> Water Quality
<span style="color: magenta;">■</span> Air Quality	<span style="color: brown;">●</span> Stormwater	

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, MPCA

Esri Community Maps Contributors, County of Ramsey, Metropolitan Council, MetroGIS, © OpenStreetMap, Microsoft, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/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%
<b>Race</b>			
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

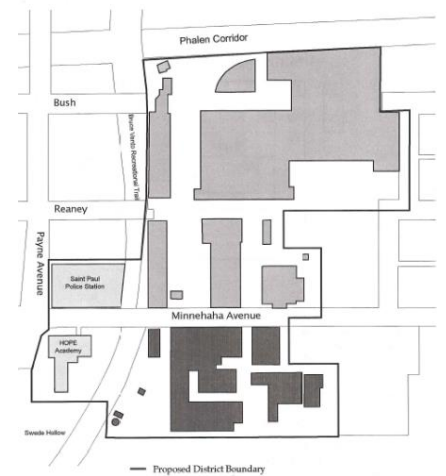
The former Hamm’s Brewery Site is a designated ‘Opportunity Site’ in the Saint Paul 2040 Comprehensive Plan. The Theodore Hamm Brewing Company was established in 1865 on Saint Paul’s East Side. The brewery grew through the late 19th and early 20th centuries, becoming an iconic Saint Paul employer and 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).

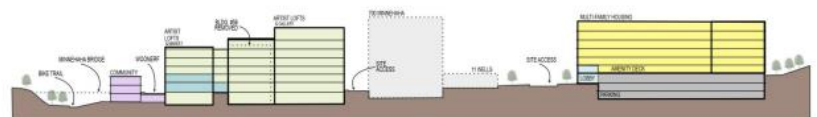
Hamm Brewery Proposed Historic District Map



### 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.



## Transit

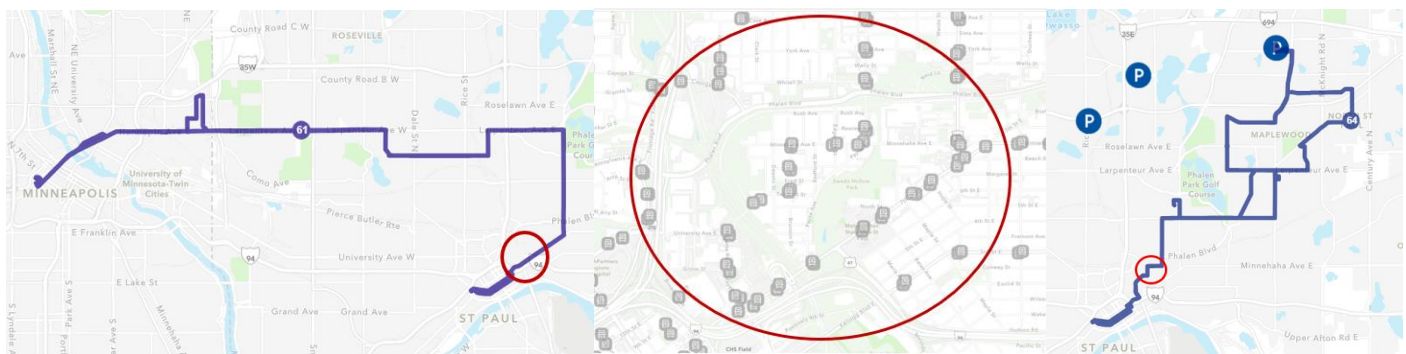
Transportation in historic Railroad Island is a challenge in all modes including vehicle, pedestrian and transit. The railroad tracks block direct traffic to-from the north, west, and south and the bluff in Swede Hollow blocks direct traffic to-from the east. Payne Avenue, Tadesco/Lafayette Road, and 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.

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*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)*

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## 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.



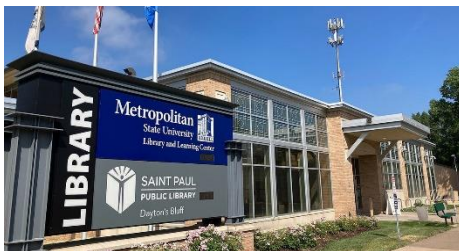
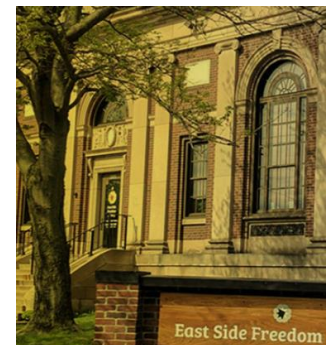
#### *Arlington Hills Community Center*

<https://sppi.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://sppi.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.

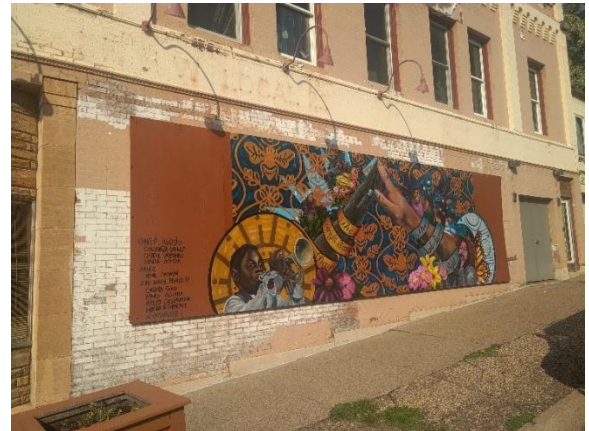
## Schools and Foundations

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

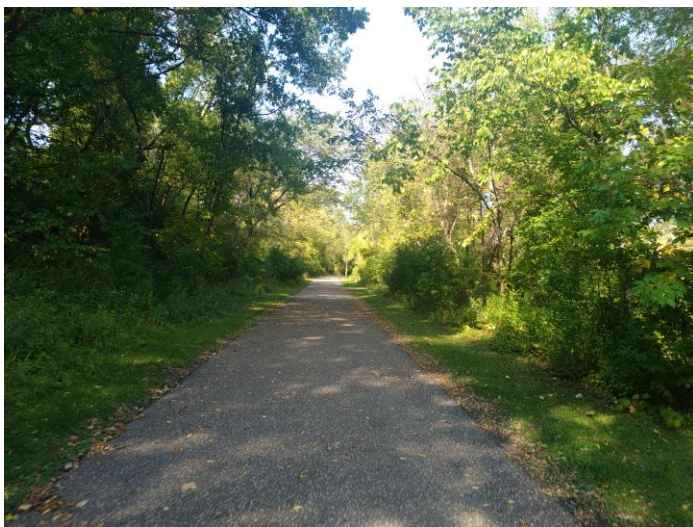




## Environmental Assets – Trail Connections

In addition to the parks described above several trail systems exist and are planned in and around Railroad Island including the Bruce Vento Regional Trail system. A passive greenspace will be created on the Rivoli Bluff Street Sweeping Site (on the western end of Minnehaha near Rivoli). Swede Hollow Park has new pedestrian trails that connect with three regional walking and biking trails, which are the Gateway trail, the Phalen-Keller Trail, and the Mounds Park/Great River Road trail, as well as to the Bruce Vento Nature Center, and to downtown St. Paul. The community seeks to work with governmental entities and neighborhood-based organizations, such as the District 5 Community Council, District 4 Community Council, and the Friends of Swede Hollow, to maintain and improve the parks and trails.

The pictures below show the Swede Hallow segment of the Bruce Vento Trail. Recent historical markers have been placed along the trail that illustrate the evolving diverse history of the Railroad Island and Swede Hallow community. One plaque explains that Swedish immigrants named this area 'Svenska Dalen' – Swede Hallow. Another plaque describes the Italian influence and immigration to the Railroad Island community.



## 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	



**Railroad Island Other Opportunities Table**
**Topics: Housing (H), Economic Development Individual Income (EDII), Transportation (T), Parks, Trails, Open Space (PTOS), Community Facilities & Programs (CFP)**

	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	

**Railroad Island Other Opportunities Table**
**Topics: Housing (H), Economic Development Individual Income (EDII), Transportation (T), Parks, Trails, Open Space (PTOS), Community Facilities & Programs (CFP)**

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 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.	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	

**Railroad Island Other Opportunities Table**
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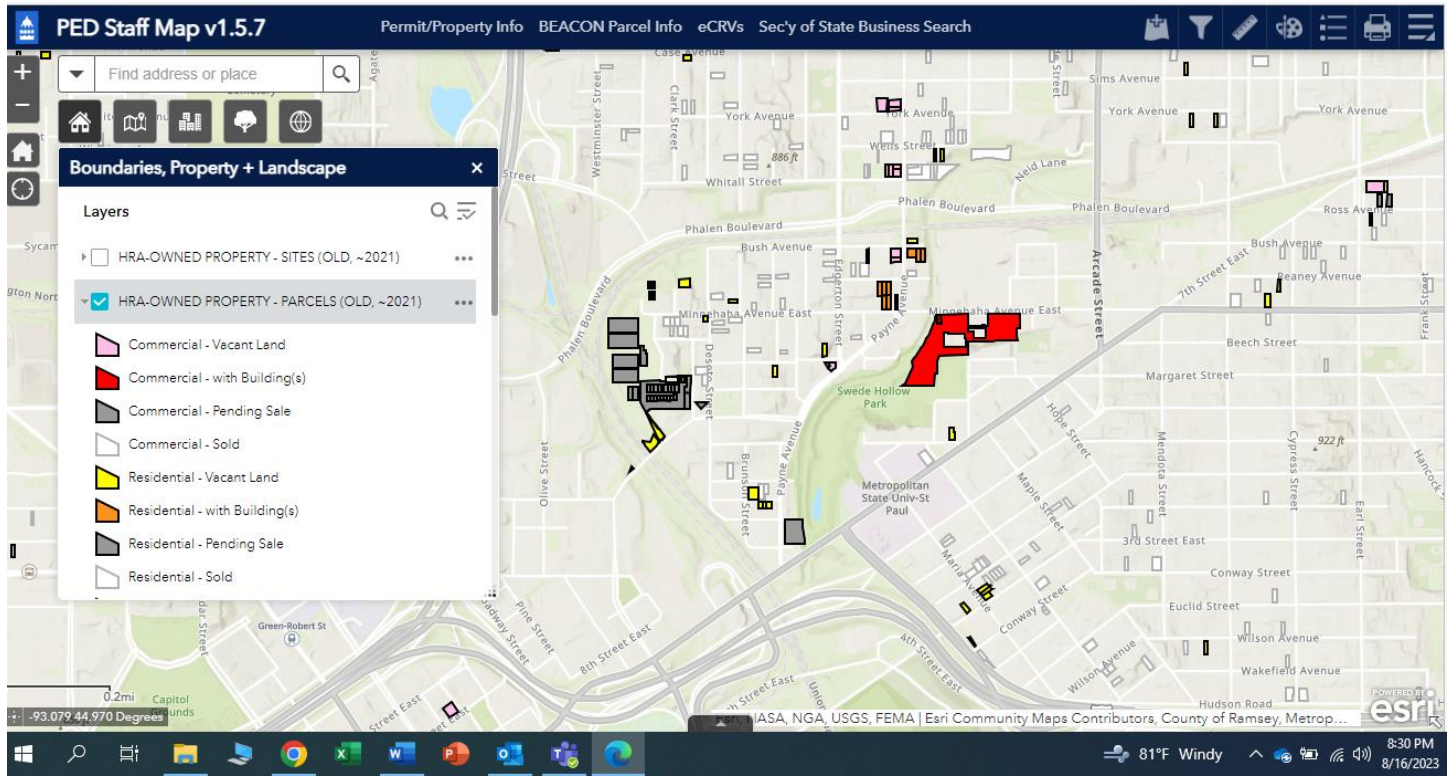
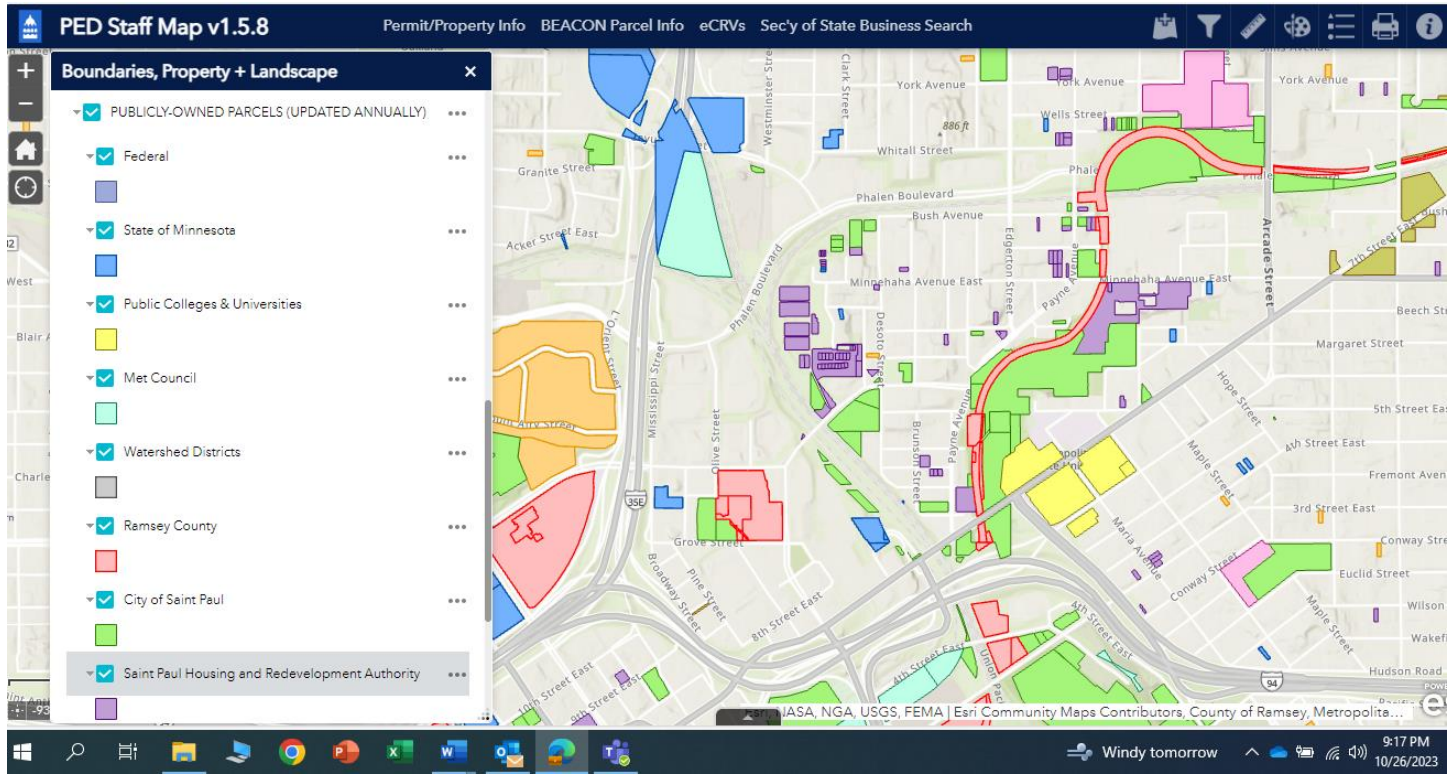
66	T10 Reconstruct Payne Avenue from East Seventh Street to Phalen Boulevard, incorporating recommendations of a neighborhood task force on streetscaping improvements such as a historic lighting system, traffic calming features, greenery, and pedestrian and bicycle safety features such as revised traffic 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	



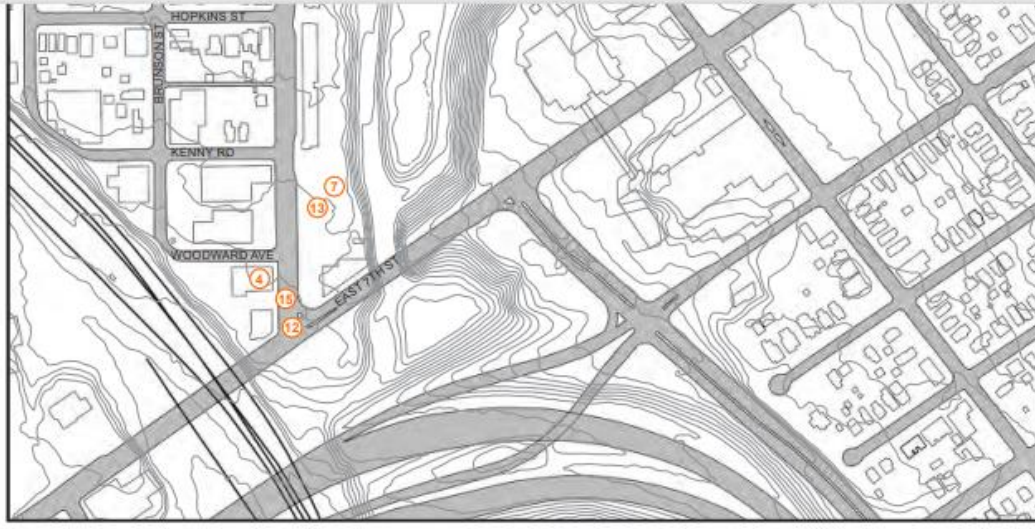
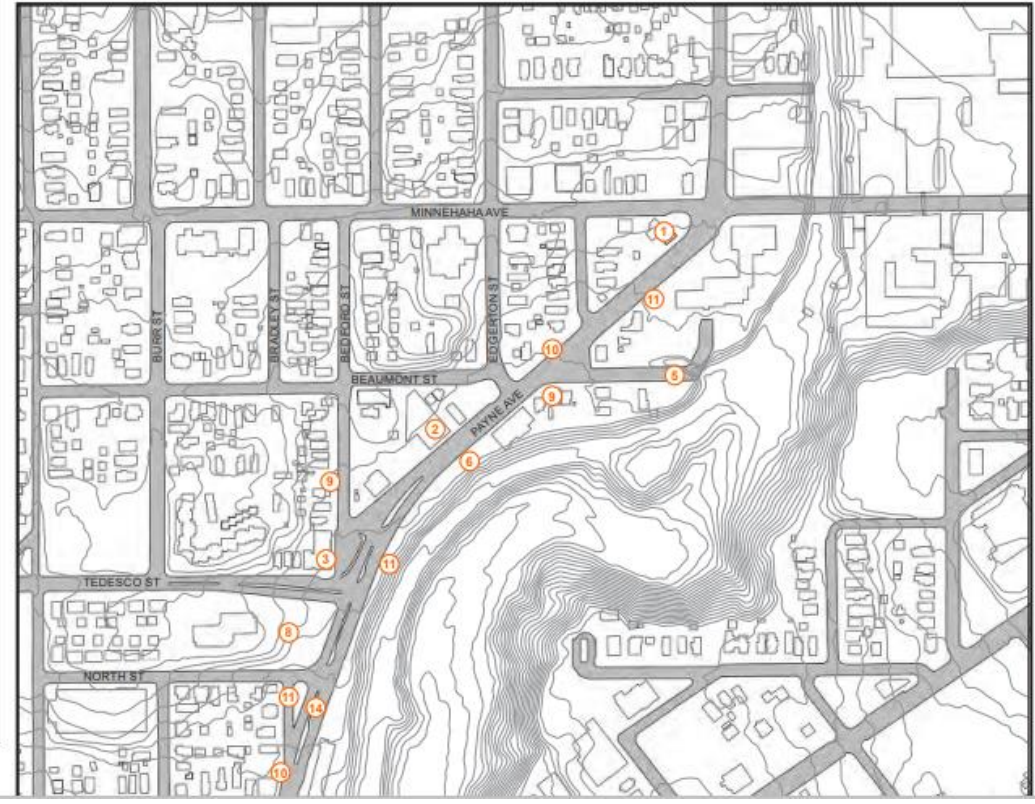
# Appendix C: Public-HRA Property





# 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 HRA parcel
- 14. Remove medians - they are hard on delivery trucks and snow plows
- 15. Develop neighborhood identity/branding

<p>Saint Paul Design Center</p>	<p>Payne Avenue Street Improvements</p>	
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