

CITY OF SAINT PAUL, MINNESOTA 2015-2019 CONSOLIDATED PLAN 2015 ACTION PLAN

This Document includes information required by the U.S. Department of Housing and Urban Development for Fiscal Year 2015:

- » Community Development Block Grant Program
- » Home Investment Partnership Program
- » Emergency Solutions Grant Program



City of Saint Paul
Planning and Economic Development Department

**APPROVED FOR
SUBMITTAL BY CITY
COUNCIL RESOLUTION
15-584**

Executive Summary

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

1. Introduction

The City of Paul is considered an entitlement community by the United States Department of Housing and Urban Development (HUD). Eligibility for participation as an entitlement community is based on population data provided by the U.S. Census Bureau and metropolitan area delineations published by the Office of Management and Budget. HUD determines the amount of each entitlement grantee's annual funding allocation formula which uses several objective measures of community needs, including the extent of poverty, population, housing overcrowding, age of housing and population growth lag in relationship to other metropolitan areas. The City anticipates receiving \$6,384,098 of Community Development Block Grant (CDBG) funding, \$1,427,984 of HOME Investment Partnership Program (HOME) funding, and \$579,908 of Emergency Solutions Grant (ESG) funding from HUD in 2015. In addition, the City estimates using about \$365,902 in CDBG program income.

This document is the 2015-2019 Consolidated Plan for the City of Saint Paul, Minnesota, to be submitted to HUD. The five-year plan portion of the document covers the period of 2015 through 2019, and the one-year Action Plan is for the 2015 program year. The Action Plan includes the City's application for 2015 CDBG funding, which the City uses to invest in housing, public improvements, economic development, public services, and job creation activities. Saint Paul also receives HOME funds to assist in the provision of long-term, safe and affordable housing, as well as ESG funding, which provides housing opportunities for homeless persons. This document will be submitted to HUD by April 15, 2015, which is forty-five days before the City's June 1, 2015 program year begins.

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

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

1. Preservation of existing affordable rental housing;
2. Development of new affordable rental housing;
3. Housing rehabilitation assistance;
4. Non-housing community development (job training and small business development, youth services, financial planning assistance, renter education, credit repair assistance, and criminal record expungement);
5. Fair housing and housing anti-discrimination efforts;

6. Supportive services to help keep households housed;
7. Tenant and landlord education;
8. Increased homeownership opportunities;
9. Homeless prevention strategies;
10. Individual homeless persons' need assessment;
11. Emergency shelters and transitional housing;
12. Transitions to permanent housing;
13. Public facilities;
14. Public infrastructure;
15. Public service needs;
16. Economic development needs;
17. Planning needs;
18. Lead-based paint abatement plan implementation;
19. Acquisition, demolition, and clearance of property;
20. Property maintenance code enforcement; and
21. Community outreach to underserved populations.

3. Evaluation of past performance

The housing needs of low income, special needs, and elderly homeowners, as well as the needs of small, large, elderly, and special needs renter households were listed as high priorities in the 2010-2014 Saint Paul Consolidated Plan. The strategies identified in the housing section of the City's Comprehensive Plan were to preserve and construct affordable housing through partnerships, and retrofit for energy efficiency.

Historically, the City has expended the majority of its funding from the Department of Housing & Urban Development (HUD) on housing activities (primarily for rehabilitation), and it continued to do so in the last program year. During the 2013 program year, all of the City's HOME Investment Partnership Program (HOME) funding, and approximately 73% of the Community Development Block Grant (CDBG) project funding was used for housing related activities. A total of 382 housing units were constructed or completed rehabilitation this year. 32% of this housing work consisted of rehabilitation of existing housing units and 68% was the rehabilitation of vacant industrial buildings into new affordable rental units. This total fell short of the proposed 2013 total housing unit goal identified in the 2010-14 Consolidated Plan, primarily due to a shortfall to the City's projected CDBG and HOME funding amounts in 2013.

The City and its subgrantees provided housing assistance to 18 (15 owner, 3 renter) extremely low income (30% of median) households, 69 (36 owner, 33 renter) very low income (50% of median) households and 295 (55 owner, 240 renter) low income (80% of median) households. A total of 42 Asian households, 44 Black households, 3 Pacific Islander household, 1 American Indian/Native Alaskan, 253 White households, and 39 other race households were assisted with housing activities during the program year. 20 of the households were of Hispanic ethnicity.

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

4. Summary of citizen participation process and consultation process

The City of Saint Paul consulted with a diverse array of public, non-profit and private sector groups throughout the planning process of the 2015-2019 Consolidated Plan. The following groups were invited to participate in the process:

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

These groups represent a range of interests including:

- St. Paul residents
- 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, persons with disabilities and mental illness

The draft plan was posted on the City's website and plans were made available for review at each of the public libraries located throughout the City. Notification of the availability of the draft plan was sent out through the City's Early Notification System (ENS) and was published in the local daily newspaper. The notice included information for persons needing special accommodations and assistance for non-English speaking residents. The City conducted a citizen survey to elicit feedback on identified priorities and preferences in funding those priorities. The City has scheduled 3 public hearings to be held on March 19, 2015 at varying times of day in low/moderate income areas at places easily accessible by public transportation and to persons with disabilities in an effort to accommodate as many citizens as possible.

The public comment period for the plan is March 2 through March 31, 2015. All comments will be included after the public comment period.

5. Summary of public comments

The City received comments from two citizens at the Consolidated Plan Public Hearings. The comments were general in nature, with two specific recommendations on projects or activities. One citizen, a real estate agent, expressed interest in dedicating funding to addressing the needs of homes in Historic Districts or removing restrictions on homes in Historic Districts in order to make them more affordable to the general public. A second citizen with particular interest combating homelessness specifically asked that that City work with partners to enhance the availability of shelter space dedicated to family units that may be made up of members of a mix of sexes. The City considered all of these comments while completing the final version of the Consolidated Plan.

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

All comments were reviewed and accepted.

7. Summary

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	ST. PAUL	Planning and Economic Development
HOME Administrator	ST. PAUL	Planning and Economic Development
ESG Administrator	ST. PAUL	Planning and Economic Development

Table 1 – Responsible Agencies

Narrative

PED was established in 1977, and is responsible for the planning, housing and economic activities throughout the City. Our mission is to actively create opportunities and encourage investment for the benefit of Saint Paul residents and businesses, which preserve, grow and sustain downtown and the city’s diverse neighborhoods.

We have 70 full-time employees that work on our four department teams – Administration & Finance, Economic Development, Housing and Planning (which includes the Heritage Preservation and Zoning).

PED has a budget of about \$9.4 million and the HRA budget is about \$44 million.

We finance affordable, and some market rate, housing development, implement economic development strategies including promoting commercial corridors, business retention and recruitment, small business lending, home rehabilitation lending and mortgage foreclosure prevention programs, emergency shelter grant programs, tax increment and bond financing programs, Neighborhood and Cultural Sales Tax loan and grant programs, and the management of a \$100 million Parking and Transit program

Consolidated Plan Public Contact Information

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

- Joe Collins - 651-266-6020
- Jamie Radel - 651-266-6614
- Jake Reilly - 651-266-6618
- Ron Ross - 651-266-6692
- Beth Ulrich - 651-266-6689

Written comments should be sent to the following address:

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

PR-10 Consultation - 91.100, 91.200(b), 91.215(I)

1. Introduction

The City of Saint Paul consulted with numerous organizations, local government agencies, and City departments throughout the consolidated planning process. The City held several community meetings and requested information via phone, e-mail and face to face interviews with organizations. The process also included the review of additional research documentation.

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)).

In an effort to reduce duplication in services and maximize funding for governmental health and mental health services, the City of Saint Paul and Ramsey County public health functions were merged, through a joint powers agreement. The administration of this function and delivery of services is provided by Ramsey County.

The City of Saint Paul consulted with a diverse array of public, non-profit and private sector groups throughout the planning process of the 2015-2019 Consolidated Plan. The following groups were invited to participate in the process:

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

These groups represent a range of interests including:

- St. Paul residents
- 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, persons with disabilities and mental illness

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

The City's Emergency Solutions Grant Program staff talks weekly with the Ramsey County Continuum of Care (COC) Coordinator in addition to attending monthly committee meetings for Ramsey County Continuum of Care Governing Board and the Ramsey County Family Homeless Prevention Assistance Program (FHPAP). The City ESG staffperson and Ramsey County COC Coordinator review all ESG, COC, and FHPAP funding allocations and service delivery programs.

During January 2015, City staff attended both Ramsey County COC Governing Board meeting and the Ramsey County FHPAP committee meeting to discuss service priorities to be established for Ramsey County Continuum of Care, FHPAP, and the City's Consolidated Plan, with a focus on ESG. The highest service priority was established for homeless families (with school age children), second highest priority was for homeless unaccompanied youth, third highest priority was for residents with mental illness.

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's Emergency Solutions Grant Program staff talks weekly with the Ramsey County Continuum of Care (COC) Coordinator in addition to attending monthly committee meetings for Ramsey County COC and Ramsey County Family Homeless Prevention Assistance Programs. ESG funding allocations were developed to 1) promote a comprehensive delivery of homelessness services; 2) support programs for underserved communities; 3) complement services provided by Ramsey County COC and Ramsey County FHPAP, 4) reduce the number of emergency shelter residents at the Dorothy Day Center, and 5) meeting city housing objectives. The ESG funding allocations were also developed in consultation with the Ramsey County COC and FHPAP programs as well as ESG funding allocations were reviewed by the Ramsey County COC coordinator.

ESG and Ramsey County COC are currently working together to develop performance evaluation standards and outcomes for ESG, COC and FHPAP service delivery programs. At the same time, ESG staff, Ramsey County COC and Wilder Research Center (HMIS administrator) are considering funding allocations to develop a more responsive HMIS system.

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

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	RAMSEY COUNTY
	Agency/Group/Organization Type	Other government - County
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Ramsey County Community and Economic Development is the lead agency for the development of Ramsey County's Five Year Consolidated Plan. The City consulted Ramsey County Community and Economic Development staff in the areas of employment and training initiatives, public service programs addressing tenant advocacy and landlord training and public health services. In 1997, the City of Saint Paul's and Ramsey County's public health function was merged through a joint powers agreement. The City and County will review each others consolidated draft plan for additional consultation.
2	Agency/Group/Organization	DISTRICT COUNCILS
	Agency/Group/Organization Type	Planning organization Neighborhood Organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development Market Analysis Non-housing Community Development Need
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Seventeen separate 501(c)3 organizations make up the collective district councils. City staff attended the district councils regularly scheduled monthly meeting to discuss neighborhood needs and priorities. The City contracts with these organizations to provide planning and advising on the physical, economic, and social development of their areas; identifying needs; and initiating community programs.
3	Agency/Group/Organization	Ramsey County Human Services
	Agency/Group/Organization Type	Other government - County

	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City's Emergency Solutions Grant Program staff talks weekly with the Ramsey County Continuum of Care (COC) Coordinator as well as ESG staff attends monthly meetings for Ramsey County COC and Ramsey County's FHPAP. City ESG staff reviews Ramsey County COC proposals and FHPAP proposals for funding recommendations. Ramsey County and Saint Paul work together to have a Program Evaluator for ESG, FHPAP, and COC programs. Additionally, it is projected that HMIS software improvements may be implemented during 2015.
4	Agency/Group/Organization	Metropolitan Consortium of Community Developers
	Agency/Group/Organization Type	Housing Regional organization Planning organization Community development consortium
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	A focus group was convened with members of the Metropolitan Consortium of Community Developers. Outcomes of the consultation included enhanced understanding of developers' needs as well as the needs of the clients they serve. Areas of improved coordination that were identified include enhanced communication to stakeholder groups around funding opportunities and community-based resources.
5	Agency/Group/Organization	Southern MN Regional Legal Services
	Agency/Group/Organization Type	Service-Fair Housing Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Anti-poverty Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was engaged through a direct conversation. SMRLS has expressed the need for increased funding due to volume of clients needing assistance with criminal record expungment in order to access affordable housing and employment. It has also seen an increase in referrals of new immigrants in need of assistance with substandard housing issues and interpretation services. The anticipated outcome includes identifying tenant education and advocacy, fair housing and legal services as a priority need.
6	Agency/Group/Organization	Saint Paul Ramsey County Public Health
	Agency/Group/Organization Type	Services-Health Health Agency Other government - County
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-housing Community Development Need
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was engaged through a direct conversation. Public Health has expressed a need for increased funding due to the increase in percentage of seniors living in the service area. That percentage is anticipated to continue to grow for the next five years and beyond. Public Health provides services to assist seniors to live independently and age in place. The anticipated outcome includes identifying aging in place services as a priority need.
7	Agency/Group/Organization	ST. PAUL YOUTH SERVICES
	Agency/Group/Organization Type	Services-Children
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy Non-housing Community Need
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was engaged through a direct conversation. St Paul Youth Services recently performed a needs assessment and has expressed need for increased funding to assist with high volume of client referrals into the youth criminal diversion project. The anticipated outcome includes identifying youth criminal diversion services as a public service need and goal.

8	Agency/Group/Organization	Saint Paul Area Chamber of Commerce
	Agency/Group/Organization Type	Regional organization Business Leaders
	What section of the Plan was addressed by Consultation?	Economic Development Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was consulted through a community focus group. The outcome includes coordination for better access to information and business assistance for business improvements and expansion as a priority.
9	Agency/Group/Organization	Minnesota Black Chamber of Commerce
	Agency/Group/Organization Type	Regional organization Business Leaders
	What section of the Plan was addressed by Consultation?	Economic Development Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was consulted through a community focus group. The outcome includes coordination for better access to information and business assistance for business improvements and expansion as a priority.
10	Agency/Group/Organization	The Saint Paul & Ramsey County Domestic Abuse Intervention Project
	Agency/Group/Organization Type	Services - Victims
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Housing Community Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was engaged through a direct conversation. The agency has expressed an increased need for funding. They cannot meet the need for the demand for services. The outcome includes funding for victim services as a priority.
11	Agency/Group/Organization	Saint Paul Public Housing Agency
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Non-Homeless Special Needs

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Throughout the fiscal year, the City and PHA representatives participate on the Ramsey County Family Homelessness Prevention Assistance Program Committee as well as other homelessness prevention initiatives. The City and Saint Paul PHA have a working partnership for which the City recognizes the challenges faced by the Saint Paul PHA administration and Saint Paul PHA residents. Additionally, Saint Paul PHA Board has awarded Project-Based Section 8 Housing Choice Vouchers to affordable housing projects financed by the City.
12	Agency/Group/Organization	Independent School District #625
	Agency/Group/Organization Type	Services-Children Services-Education
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	City ESG staff meet with the Coordinator for the Saint Paul Public Schools Title 1 Program to discuss the needs of homeless students of the Saint Paul Public Schools, including the needs of students aging out of the foster care system.

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 Community Human Services	The City's ESG and Ramsey County COC strategic priorities are similar to the goals of each plan.
Everybody In	Ramsey County Workforce Investment Board	The City's Anti-poverty Strategy and economic development goals coincide with the job readiness and job creation goals of "Everybody In"

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

Table 3 – Other local / regional / federal planning efforts

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 percent 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 health care, senior services, and youth employment programs. Ramsey County is required to prepare its own Five-Year Plan and each agency reviews the others plan for consistency.

The Saint Paul Public Housing Agency (PHA) is the principal provider of housing assistance to the City’s low and moderate income persons. In Saint Paul, the PHA is a separate legal entity, and not a part of City government. The City works very 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 PHA is required to prepare its own Five-Year Plan, and each agency reviews the others for consistency.

The City of Saint Paul works very closely and cooperatively with the Minnesota Housing Finance Agency (Minnesota Housing) through programs that fund all types of housing needs. For affordable multi-family rental housing projects, most are financed using the Housing Tax Credits (HTC) Program for projects involving new construction, rehabilitation, or acquisition with rehabilitation. Both Minnesota Housing and the City of Saint Paul offer their allocation of tax credits through annual competitive application processes that also coordinates and rank other housing resources. During this application process, the City and Minnesota Housing staff has routine meetings and on-going conversations to discuss project rankings and work together to help determine funding priorities in order to match limited funding resources with projects that meet the highest local affordable rental housing needs. In addition to cooperation with the tax credit program, City and Minnesota Housing staff meets monthly as part of the Intergovernmental Stabilization Group (ISG) that includes other funding partners such as HUD, Family

Housing Fund and LISC to collaborate on preserving existing affordable rental housing projects. For single-family home ownership needs, the City collaborates and receives funding from Minnesota Housing through their home owner rehabilitation loan programs and foreclosure prevention programs. For acquisition, rehabilitation and new construction of single-family properties, Minnesota Housing has been providing the City funding through their competitive application process for Community Housing Impact Funds (CHIF), as well as, providing the City some of the State's allocation of federal Neighborhood Stabilization Program (NSP) funding to further the City's Inspiring Communities program goals.

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.

The City works closely with the City of Minneapolis. Together, the Saint Paul Housing and Redevelopment Authority and the Minneapolis Community Development Agency form the Minneapolis/Saint Paul Housing Finance Board with the purpose of providing decent, safe, sanitary and affordable housing to residents of the Cities.

Narrative (optional):

PR-15 Citizen Participation

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

The City of Saint Paul met with an array of public, non-profit and private sector groups throughout the planning process of the 2015-2019 Consolidated Plan. Five community meetings, specific to the consolidated plan process were held. The Department of Planning and Economic Development (PED) provided information on the Consolidated Plan process, eligible uses of CDBG, HOME and ESG funds, historical uses of the City of Saint Paul's CDBG and HOME funds, and the demographic trends based on the American Community Survey (ACS) data supplied by HUD. In addition, community outreach efforts were made to organizations providing services for fair housing, youth corrections, health, public housing, homeless, and victim services. All goals were based on the priorities identified during the consultation and citizen participation process.

The draft plan was posted on the City's website and plans were made available for review at each of the public libraries located throughout the City. Notification of the availability of the draft plan was sent out through the City's Early Notification System (ENS) and was published in the local daily newspaper. The notice included information for persons needing special accommodations and assistance for non-English speaking residents. The City conducted a citizen survey to elicit feedback on identified priorities and preferences in funding those priorities. The survey was open from March 1 through March 31 and received 112 responses. Of those, nine were non-residents of Saint Paul who work in Saint Paul for government or community-based agencies. Thirty-nine respondents live in Saint Paul while 64 both lived and worked in Saint Paul. Respondents ranged from local non-profit agencies and government agencies to retirees, social service-agency employees, and retail establishments. All neighborhoods were represented. Respondents were asked to rank activities in order of importance to them and all respondents did so.

The City held 3 public hearings on March 19, 2015 at varying times of day in low/moderate income areas at places easily accessible by public transportation and to persons with disabilities in an effort to accommodate as many citizens as possible. Two persons commented at the public hearings. The thirty day public comment period for the plan was March 2 through March 31, 2015. No additional comments were received on the plan outside of the public hearing.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Meeting	Non-targeted/broad community	12 members of the Capital Improvement Budget Committee	Map was requested identifying the CDBG eligible areas. Comment regarding Tiny Houses and how it relates to the City's housing plan was forwarded to the City's Planning Director for response.		

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Public Meeting	Non-targeted/broad community	14 District Council Executive Directors and Community Organizers	A wide variety of community organizers commented on information and data presented in person to them about the Consolidated Plan process, data informing that process and strategy, and next steps. Those community members noted issues that they have seen in their communities, including, but not limited to: increased taxes preventing some residents from being able to stay in their homes, particularly those on fixed incomes; lack of ability to build accessory dwelling units; lack of accessible housing for seniors; preservation of existing affordable units, including so-called naturally occurring affordable units; funds for minor	20	

Consolidated Plan

ST. PAUL

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
3	Public Meeting	community developement	Met with members of the Metropolitan Consortium of Community Developers (19 members present)	A wide variety of non-profit developers (mostly housing related) commented on information and data presented in person to them about the Consolidated Plan process, data informing that process and strategy, and next steps. Those community members noted issues that they have seen in their communities, including, but not limited to: housing resources to allow senior citizens to age in place; eliminating barriers to housing, particularly affordable housing; tenant education, particularly for new Americans or the previously long-term homeless; landlord education for assisting new American communities; the hard	N/A	21

Consolidated Plan

ST. PAUL

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4	Public Meeting	Business Community	Representatives from two area chambers of commerce attended	Comments received focused on the need for better access to information and programs available, small infrastructure improvement funding in commercial areas, funding for business expansion, workforce development and good public transportation access.	N/A	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
5	Public Hearing	Non-targeted/broad community	Three public hearings were held on March 19 at varying times of day in low/moderate income areas with good access to public transportation in an effort to maximize citizen participation for the 2015-2019 Consolidated Plan.	The City received comments from two citizens at the Consolidated Plan Public Hearings. The comments were general in nature, with two specific recommendations on projects or activities. One citizen, a real estate agent, expressed interest in dedicating funding to addressing the needs of homes in Historic Districts or removing restrictions on homes in Historic Districts in order to make them more affordable to the general public. A second citizen with particular interest combating homelessness specifically asked that that City work with partners to enhance the availability of shelter space dedicated to family	All comments were accepted.	
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Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
6	Internet Outreach	Non-targeted/broad community	The survey was open from March 1 through March 31 and received 112 responses. Of those, nine were non-residents of Saint Paul who work in Saint Paul for government or community-based agencies. Thirty-nine respondents live in Saint Paul while 64 both lived and worked in Saint Paul. Respondents ranged from local non-profit agencies and government agencies to retirees, social service-agency employees, and retail establishments. All neighborhoods were represented.	Respondents were asked to rank activities in order of importance to them and all respondents did so.		

Table 4 – Citizen Participation Outreach

Needs Assessment

NA-05 Overview

Needs Assessment Overview

The Needs Assessment portion of the City of Saint Paul's 2015-2019 Consolidated Plan examines several key areas critical to creating a livable community for all residents of the City.

The section specifically undertakes the following:

- Completes an overall housing needs assessment
- Identifies disproportionate need among the city's racial 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

Population estimates in the following table reflect the population, household and median income for residents of Saint Paul. According to the 2007-2011 American Community Survey (ACS) estimates, the City of Saint Paul has 283,911 residents and 111,882 households. The data reflects that the city experienced a decrease in population and households from the 2000 Census. According to the 2007-2011 estimates, the median household income was \$45,939. Although the 2007-2011 estimates were the most recent provided by HUD, a review of more recent data reveals an increase in both the population and number of households. As noted in the 2009-2013 ACS estimates, the City's population included 288,802 residents and 111,907 households, which indicates a small increase in population since 2000. The median income in 2013 for households in the City was \$47,010. The following tables provide an overview and breakdown of the City's population by size, income, age, and housing needs.

Demographics	Base Year: 2000	Most Recent Year: 2011	% Change
Population	287,151	283,991	-1%
Households	112,128	111,882	-0%
Median Income	\$38,774.00	\$45,939.00	18%

Table 5 - Housing Needs Assessment Demographics

Data Source: 2000 Census (Base Year), 2007-2011 ACS (Most Recent Year)

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households *	24,300	16,520	19,355	12,005	39,700
Small Family Households *	6,640	5,060	6,225	4,375	19,380
Large Family Households *	3,115	1,595	1,830	1,140	3,175
Household contains at least one person 62-74 years of age	2,960	2,445	2,265	1,670	5,000
Household contains at least one person age 75 or older	2,475	2,295	1,610	815	1,980
Households with one or more children 6 years old or younger *	5,150	3,130	3,090	1,745	4,495
* the highest income category for these family types is >80% HAMFI					

Table 6 - Total Households Table

Data Source: 2007-2011 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
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	320	100	40	45	505	10	15	15	35	75
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	720	315	225	45	1,305	35	40	70	130	275
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	1,110	720	585	80	2,495	270	230	390	205	1,095
Housing cost burden greater than 50% of income (and none of the above problems)	10,440	1,530	280	0	12,250	2,585	1,740	1,145	375	5,845
Housing cost burden greater than 30% of income (and none of the above problems)	3,325	5,795	2,320	295	11,735	610	1,385	3,130	2,225	7,350
Zero/negative Income (and none of the above problems)	1,010	0	0	0	1,010	215	0	0	0	215

Table 7 – Housing Problems Table

Data Source: 2007-2011 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
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	12,585	2,665	1,125	175	16,550	2,900	2,025	1,620	750	7,295
Having none of four housing problems	6,410	8,555	9,120	4,420	28,505	1,180	3,280	7,490	6,665	18,615
Household has negative income, but none of the other housing problems	1,010	0	0	0	1,010	215	0	0	0	215

Table 8 – Housing Problems 2

Data Source: 2007-2011 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	4,615	2,305	690	7,610	780	1,150	2,115	4,045
Large Related	1,980	550	125	2,655	625	455	415	1,495
Elderly	2,215	1,255	355	3,825	1,165	960	565	2,690
Other	6,670	3,610	1,515	11,795	910	725	1,340	2,975
Total need by income	15,480	7,720	2,685	25,885	3,480	3,290	4,435	11,205

Table 9 – Cost Burden > 30%

Data Source: 2007-2011 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	3,320	440	55	3,815	715	620	440	1,775
Large Related	1,410	105	30	1,545	500	260	60	820
Elderly	1,365	510	95	1,970	775	410	195	1,380
Other	5,340	510	110	5,960	805	510	475	1,790
Total need by income	11,435	1,565	290	13,290	2,795	1,800	1,170	5,765

Table 10 – Cost Burden > 50%

Data Source: 2007-2011 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	1,725	860	650	65	3,300	270	220	315	185	990
Multiple, unrelated family households	130	135	95	50	410	35	45	150	135	365
Other, non-family households	0	60	65	4	129	0	0	0	15	15
Total need by income	1,855	1,055	810	119	3,839	305	265	465	335	1,370

Table 11 – Crowding Information – 1/2

Data Source: 2007-2011 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	0	0	0	0	0	0	0	0

Table 12 – Crowding Information – 2/2

Data Source Comments:

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

According to the 2007 – 2011 American Community Survey, there are 40,683 single-individual households in Saint Paul with approximately 7,160 single-individual households age 65 or older. Elderly nonfamily households, which includes single households, are approximately six times more likely to be extremely low income than elderly family households. For non-elderly single person households those living at extremely and very low incomes are particularly susceptible to experiencing housing cost burdens.

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. The City does contract with the St. Paul Domestic Abuse Intervention Project, an organization serving women who have experienced domestic violence in their household, and they report the number of housing-related services they provide to their clients. Annually this organization recommends 630 women for emergency sheltering with one of the three organizations in the City that provide that service. These providers include Women’s Advocate 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, the Intervention Project also provides housing advocacy services to their clients to help them find permanent housing and housing assistance. They have provide this service to 680 women in the last year.

What are the most common housing problems?

Cost burden is the most highly reported housing problem in Saint Paul across all household income levels and tenure types with crowding reported second most commonly. Over half of the renters up to 100% of AMI are identified as being cost burdened with 25% cost burdened and 27% severely cost burdened. Eighty-seven percent of the incidences of extreme cost burden in rental housing occur in households earning 30% of AMI or less. Those rental households earning between 30% to 50% of AMI have the highest rate of cost burden with 49% of the occurrences. Ownership households experience cost burden at an overall similar rate to rental with slightly different trends at income levels. While 74% of the incidence of severe cost burden occurs at income levels between 0 to 50% of AMI, 73% of the incidence of cost burden occurs at 50% to 100% of AMI.

One in five households between 0 to 100% of AMI was considered overcrowded with fairly even distribution (on an overall percentage of households) between rental and ownership households. Forty-four percent of the incidence of overcrowding in rental households are experienced at 0 to 30% of AMI, while in ownership households those at 50 to 80% of experience 36% of the incidents.

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-nine percent of households at very low income are cost burdened with 52% extremely cost burdened, while 65% of low income households are cost burdened with 14% extremely cost burdened. Those households experiencing the highest rate of extreme cost burden are small-related households and “other” households between 0 – 30% of AMI. Very low income large-related family households have the highest percentage within their cohort of cost burden with a fairly uniform distribution amongst the other categories.

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 high cost burden or job disruption; thus they are 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-rehousing 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:

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 incomes;
- 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:

- Area median income has only increased 18% from 2000 to 2011.
- Rental households are over two times more likely to experience cost burden and three times more likely to experience severe cost burden than ownership households.
- Extremely low and low income renters are severely cost burdened.
- Although substandard housing and overcrowding situations exist, relatively few households are experiencing these conditions.
- Extremely low income rental households and moderate income ownership households experience the highest incident of overcrowding within each tenure category.
- Rental households experience three times the incidents of overcrowding compared to ownership households.

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 disproportionate severe housing need as when the percentage of any racial or ethnic group has a disproportionately greater need in comparison to the needs of that category of need as a whole. For the purposes of HUD, disproportionately greater need exists when the percentage of persons in a category of need who are members of a particular racial or ethnic group is at least 10 percentage points higher than the percentage of persons in a category as a whole. 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.

0%-30% 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	18,910	3,805	1,030
White	9,660	2,315	365
Black / African American	4,350	825	360
Asian	2,065	390	145
American Indian, Alaska Native	270	80	0
Pacific Islander	0	0	0
Hispanic	1,915	125	130

Table 13 - Disproportionally Greater Need 0 - 30% AMI

Data Source: 2007-2011 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	10,840	5,545	0
White	6,390	3,440	0
Black / African American	2,100	935	0
Asian	945	485	0
American Indian, Alaska Native	45	85	0
Pacific Islander	0	0	0
Hispanic	1,095	495	0

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Data Source: 2007-2011 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	8,540	12,485	0
White	6,060	9,450	0
Black / African American	950	1,390	0
Asian	760	595	0
American Indian, Alaska Native	10	155	0
Pacific Islander	0	30	0

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
Hispanic	640	685	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Data Source: 2007-2011 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	3,320	8,685	0
White	2,480	6,910	0
Black / African American	235	605	0
Asian	305	400	0
American Indian, Alaska Native	10	125	0
Pacific Islander	0	0	0
Hispanic	230	470	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Data Source: 2007-2011 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

Under the HUD defined analysis of disproportionate housing need by race, the follow 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 50% - 80% and 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. At extremely low incomes, 26% occurrence of one or more of the four severe housing problems is in African American households while this group represent 14% of the city's population. Asian households at extremely low, very low, low, and moderate income levels experience a higher incident of severe housing problems—13%, 18%, 26%, and 32%, respectively—than the 8% they represent within the City's households. Hispanic households follow a similar pattern starting at very low to moderate incomes. This group represents 7% of the City's households, but has 15%, 17%, and 18% of the severe housing problems 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 define disproportionate housing cost burden as when the percentage of any racial or ethnic group has a disproportionately greater housing cost burden in comparison to the others of that category of need as a whole. For the purposes of HUD, disproportionately greater housing cost burden exists when the percentage of persons in a category of need who are members of a particular racial or ethnic group is at least 10 percentage points higher than the percentage of households in a category as a whole.

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.

0%-30% of Area Median Income

Severe 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	15,130	7,585	1,030
White	7,530	4,445	365
Black / African American	3,700	1,475	360
Asian	1,755	695	145
American Indian, Alaska Native	170	180	0
Pacific Islander	0	0	0
Hispanic	1,425	615	130

Table 17 – Severe Housing Problems 0 - 30% AMI

Data Source: 2007-2011 CHAS

*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

Severe 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	4,175	12,205	0
White	2,430	7,410	0
Black / African American	570	2,460	0
Asian	600	825	0
American Indian, Alaska Native	14	115	0
Pacific Islander	0	0	0
Hispanic	440	1,140	0

Table 18 – Severe Housing Problems 30 - 50% AMI

Data Source: 2007-2011 CHAS

*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

Severe 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	2,440	18,590	0
White	1,300	14,210	0
Black / African American	330	2,005	0
Asian	470	885	0
American Indian, Alaska Native	0	170	0

Severe 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
Pacific Islander	0	30	0
Hispanic	305	1,015	0

Table 19 – Severe Housing Problems 50 - 80% AMI

Data Source: 2007-2011 CHAS

*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

Severe 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	525	11,480	0
White	225	9,155	0
Black / African American	50	790	0
Asian	170	545	0
American Indian, Alaska Native	0	140	0
Pacific Islander	0	0	0
Hispanic	75	630	0

Table 20 – Severe Housing Problems 80 - 100% AMI

Data Source: 2007-2011 CHAS

*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 follow 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 50% - 80% and 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. At extremely low incomes, 26% occurrence of one or more of the four severe housing problems is in African American households while this group represent 14% of the city's population. Asian households at extremely low, very low, low, and moderate income levels experience a higher incident of severe housing problems—13%, 18%, 26%, and 32%, respectively—than the 8% they represent within the City's households. Hispanic households follow a similar pattern starting at very low to moderate incomes. This group represents 7% of the City's households, but has 15%, 17%, and 18% of the severe housing problems at those income levels.

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:

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	67,235	23,295	19,045	1,130
White	53,295	15,445	11,205	365
Black / African American	5,115	3,460	3,975	405
Asian	3,960	1,740	1,490	195
American Indian, Alaska Native	650	150	165	0
Pacific Islander	30	0	0	0
Hispanic	3,165	2,035	1,570	130

Table 21 – Greater Need: Housing Cost Burdens AMI

Data Source: 2007-2011 CHAS

Discussion:

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?

Income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole are as follows:

- Asian households at 50% - 80% and 80% - 100% of AMI have disproportionate housing needs
- Hispanic households at 30-50% and 50% - 80% of AMI have disproportionate housing needs
- Asian households at 30% - 50%, 50% - 80%, and 80% – 100% of AMI have disproportionate severe housing needs.
- Hispanic households at 30-50% and 50% - 80% of AMI have disproportionate severe housing needs.
- African American households experience housing cost burden and severe cost burden.
- American Indian households experience housing cost burden and severe cost burden.

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

- African American households at 0 - 50% of AMI experiencing one or more of the four housing problems and at up to 30% of AMI experience more severe housing problems is higher than the percentage of African Americans within the City.
- Asian households at 0 - 100% of AMI experiencing one or more of the four severe housing problems is higher than the percentage of Asian households within the City.
- Hispanic households at 30 - 100% of AMI experience one or more of the four sever housing problems is higher than the percentage of Hispanci households within the City.

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

The City of Saint Paul has identified areas where those racial or ethnic groups identified with disproportionately greater housing need, including African American, Asian, and Hispanic households represent approximately one-third of the households living in a particular census tract. These include:

- African American households within census tracts 33500, 33600, 33800, and 33900 within the Rondo neighborhood; 32700, 33700, and 42800 within the Frogtown neighborhood, and 37403 in the Battlecreek/Highwood Hills neighborhood;
- Asian households with census tracts 32600 and 32700 within the Frogtown neighborhood, 30500 within the North End neighborhood, and 30601, 30900, 31500, and 31600 within the Payne-Phalen neighborhood; and
- Hispanic households in census tracts 36100 and 37200 within the West Side neighborhood.

NA-35 Public Housing – 91.205(b)

Introduction

The City of Saint Paul has approximately 16,460 housing units that are rent-controlled and/or income restricted (representing about 15 percent of the total housing units in the city, or 36 percent of the total occupied rental housing stock). Saint Paul has approximately 4,259 public housing units (of the 10,279 affordable rental housing units citywide, either public or privately-owned and publicly-assisted), 4,589 units receiving Section 8 rental assistance, totaling 8,848 units, and approximately 2429 supportive housing units or emergency shelter/licensed beds.

Saint Paul Public Housing Agency (PHA) owns and operates the City's public housing units. PHA's mission is to "help families and individuals with low incomes achieve greater stability and self reliance by providing safe, affordable, quality housing and links to community services." [1] PHA has a "high performer" status under HUD's Public Housing Assessment System - achieved through high management, maintenance, and financial standards. PHA also maintains a "high performer" status under HUD's Section 8 Management Assessment Program - achieved via high voucher utilization and effectively administering Section 8 Housing Choice Voucher and Project-Based Assistance (PBA). [2]

PHA serves households with low to extremely low incomes. The average household size is 4.4 in the family sites and 1.0 in the hi-rises. The average household income is \$13,905. The following is a listing of the core services offered by PHA:

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	77	4,176	4,090	395	3,440	60	80	115

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			Special Purpose Voucher	
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program
Average Annual Income	0	6,061	13,905	12,564	10,483	12,925	10,404	8,722
Average length of stay	0	1	7	7	1	8	0	0
Average Household size	0	1	2	2	2	2	1	3
# Homeless at admission	0	13	3	5	0	0	1	4
# of Elderly Program Participants (>62)	0	6	1,052	527	15	482	3	0
# of Disabled Families	0	37	1,627	1,528	131	1,269	29	11
# of Families requesting accessibility features	0	77	4,176	4,090	395	3,440	60	80
# 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

Race	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	35	1,356	1,354	82	1,168	25	32	47
Black/African American	0	41	1,497	2,365	280	1,967	34	39	45
Asian	0	1	1,278	260	16	221	1	4	18
American Indian/Alaska Native	0	0	39	111	17	84	0	5	5
Pacific Islander	0	0	6	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0	0

*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

Ethnicity	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	5	171	186	18	139	3	14	12
Not Hispanic	0	72	4,005	3,904	377	3,301	57	66	103

*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)

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

It is the 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. [1]

Saint Paul PHA currently has 2,209 persons on its waiting list that could be eligible for a Disability Allowance. That said, many applicants for public housing or Section 8 Vouchers need housing with one or more accessibility features, such as no-step approaches, grab bars in bathrooms, and easily operated door handles. Moreover, many applicants may need up to six accessibility features. At the same time, many PHA applicants need accessible housing that is affordable housing as their average household income is often just slightly over the federal poverty rate.[2]

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

- **PHA Congregate Housing Services Program** which provides an individualized program for residents who are elderly or disabled and require a moderate amount of non-medical services to maintain independence.
- **PHA/Wilder Assisted Living Program** provides comprehensive supportive services to assist frail or disabled residents at risk of nursing home placement at two PHA hi-rises.
- **PHA/New Beginnings-Brain Injury Program** has 28 apartments in which Accessible Space Inc. provides 24-hour personal care attendant service and support services for residents who experienced brain injuries.
- **PHA/Accessible Space, Inc.** has 6 apartments at Valley Hi-rise in which Accessible Space Inc. provides 24-hour attendant service and support services for residents with mobility impairments and/or complications from diabetes.

To further meet Section 504 requirements, Saint Paul PHA allocates a portion of its HUD funding provided under the Capital Fund Program to modify its housing stock by making reasonable accommodations, such as installing grab bars in bathrooms, installing ramps, widening doors, and modifying kitchen cabinets and counters, as appropriate. In 2015, Saint Paul PHA will also construct another accessible-designed townhouse at McDonough Homes. At the same time, PHA 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, and its PHA Central Administrative Office building also meets all Section 504 ADA requirements.

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

St Paul PHA has 8749 applicants on its waiting list for all bedroom sizes (efficiencies to 5 bedrooms) with a 1% vacancy rate. St. Paul PHA Section 8 Waiting List has been closed since 2007. Statistics speak for themselves. There is a great need for affordable housing for all bedroom sizes.

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

Applicants for Saint Paul Public Housing programs have housing needs that are similar to many Saint Paul residents. Simply low and moderate income households need housing that is affordable for their income and family size. However, such affordable housing demands exceed the housing supply. Currently, Saint Paul Public Housing Agency consistently operates at 99% occupancy rate, and its Section 8 Program remains closed. At the same time, low and moderate income residents have few private market alternatives especially when the private rental market (Twin Cities metro-wide) has a 2.4% apartment vacancy rate. Consequently, the lack of affordable housing in the Twin Cities effectively reduces housing choice for many low and moderate income residents[1]

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.[1] In response, Saint Paul’s Affordable Housing Policy requires that city-financed rental projects be affordable (10% of units at 30% area median income (AMI) and 10% at 50% AMI). Furthermore, the City’s Locational Choice Policy and its Low Income Housing Tax Credit Selection Process move “the City toward a more equitable distribution of affordable housing” citywide in neighborhoods [2] that promote access to jobs.

Saint Paul’s PHA has approximately 16,460 publicly-assisted affordable housing units (including supportive housing units and shelter beds) and approximately 4,589 Section 8 vouchers, [3] such that approximately 30% of all City renters receive some affordable housing benefit. [4] During recent years, the City provided financing to preserve, renovate, or construct 275 units [5] of affordable rental housing— using financing, such as low-income housing tax credits, federal funds (such as CDBG, NSP, HOME), TIF, and City’s STAR funds.

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

[1]Affordable housing owners can pre-pay or opt-out of subsidized housing. *Regional Analysis of Impediments to Fair Housing, prepared for the Cities of Saint Paul, Bloomington, Minneapolis, and Plymouth; the Counties of Anoka, Dakota, Hennepin, Ramsey, and Washington and Minnesota Housing Finance Agency for the Counties of Scott and Carver.* May 2001, p. 69.

[2] West Side Flats (West Side); Rolling Hills (East Side); Schmidt Brewery Apartment (West 7th St); and Hamline Station and Episcopal Homes (Univ. Ave/Central Light Rail Transit Corridor). PPL West 7th Housing (Highland Park).

[3] Consolidated Plan and Submission 2010-2014, City of Saint Paul; 2013 Annual Report, Saint Paul Public Housing Agency.

[4] U.S. Census American Community Survey 2007-2011.

[5] In 2013-2014, the City provided financing for Maryland Park Apts (172 affordable units – East Side); Lewis Park Apts (103 accessible-designed units at 30% AMI – North End); 180 Degrees -12 shelter beds for unaccompanied youth; Rolling Hills (108 units at or below 50% of AMI); Episcopal Homes (50 units for seniors); St. Phillip’s Garden (55 affordable units); St. Alban’s Park (78 units of affordable units); and Jamestown Homes (73 affordable units)

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction:

This section provides statistical data to describe the needs for emergency shelters for adults and families. That said, the number of people in shelters - including adult singles, youth, and families – often exceed the capacity of shelters.

In response, the City and County have provided additional funding for an overflow cold-weather emergency shelter at the Dorothy Day Center. At the same time, Union Gospel Mission has provided additional emergency shelter beds. The Catholic Charities Family Service Center expanded its emergency family shelter from 55 beds to 65 beds. The Ramsey County Continuum of Care initiated its Coordinated Access to Housing and Shelter (CAHS) which conducts assessment to help determine the most appropriate housing referral when families are seeking emergency shelter.

To meet the critical need for more emergency shelter beds, Mayor Coleman established the Mayor’s Community Task Force to evaluate the needs of homeless residents at the Dorothy Day Center while also searching locations for a new Dorothy Day Center.

As a result of community discussions and the herculean work by Catholic Charities, the State of Minnesota has allocated \$25 million to the Dorothy Day Center ReVision Project which will provide a new emergency shelter, permanent supportive housing, pay-for-stay housing, and respite medical care housing to be built in downtown Saint Paul – using the “Higher Ground” housing model. Construction will begin during Fall 2015/Spring 2016. The State of Minnesota also awarded capital funds to build Prior Crossing, a 44-unit development for homeless young adults. Together, “the [State of Minnesota] investment being made here in Saint Paul will help ensure the dignity of all people through new and improved shelters, preservation of existing housing and construction of new affordable housing opportunities all of which are vital to the city’s future growth and success,” said Mayor Chris Coleman in a statement.

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)	635	29	0	0	0	0
Persons in Households with Only Children	23	1	0	0	0	0
Persons in Households with Only Adults	650	57	0	0	0	0
Chronically Homeless Individuals	164	52	0	0	0	0
Chronically Homeless Families	53	12	0	0	0	0
Veterans	55	8	0	0	0	0
Unaccompanied Child	60	5	0	0	0	0
Persons with HIV	7	0	0	0	0	0

Table 26 - Homeless Needs Assessment

Data Source Comments: Point in Time County St. Paul/Ramsey COC MN 501 for year 2015

Indicate if the homeless population is: Has No Rural Homeless

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 are individuals who lack a fixed, regular, & adequate nighttime residence; or have primary nighttime residence that is supervised, publicly- or privately-operated temporary living accommodation,(i.e. emergency shelters, transitional housing, battered women's shelters, or nighttime residence in any place not meant for human habitation.

Definition of Long-term Homeless Resident is considered chronically homeless if individual has (a) either lived continuously in shelter for 12 months or more ending in (or continuing through) the year in question, or (b) had separate shelter stays during at least 4 calendar quarters in the past 3 years, including the year in question.

Definition of Homeless Youth is youth who currently 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. (unaccompanied homeless youth-ages 8 to 17; young adults (18 to 20).

The *Homelessness in Minnesota* Report (Wilder Research, September 2013) provides some general statistics about homelessness in Minnesota:

Homeless Families

- Number of homeless families and children is rising; 51% of homeless children are age 5 or younger;
- While single adults head most homeless families, a growing number of homeless families are headed by couples.

Homeless Adults

- 53% are men; 47% are women; men are more likely to stay outside (74%) and reside in emergency shelter (64% male)
- Women are more likely to live in transitional housing (61% female)
- 22% of homeless adults-diagnosed with substance abuse disorder, 51% report a chronic health condition; 55% report a significant mental illness.

Homeless Youth/Unaccompanied Youth:

- 58% of homeless youth in Minnesota living in Twin Cities; 35% of homeless youth lived in a foster home; 69% of homeless youth attended school on day of survey
- 15% of homeless youth identified as lesbian, gay, bisexual or unsure about sexual orientation
- 60% of homeless youth had a parent who has been incarcerated
- 52% of homeless youth report some type of significant mental health; 36% report some type of chronic physical health issues.
- 55% of homeless youth have been abused or neglected; 21% have been attacked or beaten while homeless

Homeless Veterans

- 9% of homeless adults have served in military; 24% are 55 years or older; 56% of homeless veterans are not receiving any veterans' benefits
- 47% of homeless veterans report service-related health problems; 18% report service-related mental health problems.
- 34% of Iraq/Afghanistan combat veterans have evidence of traumatic brain injury

Chronically-Homeless Individuals

- 26% of long-term homeless adults have substance abuse disorder; 54% report a chronic health condition; 60% have a serious mental illness
- 48% of long-term homeless have a condition that limits work.

Persons with HIV (HIV statistics current as of 4/30/14; courtesy of the Minnesota Department of Health)

- In 2013, 39% of the 301 newly reported cases of HIV resided in Minneapolis, 10% in Saint Paul, and 32% in Twin Cities' suburbs

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
White	383	34
Black or African American	829	37
Asian	45	4
American Indian or Alaska Native	72	4
Pacific Islander	9	0
Ethnicity:	Sheltered:	Unsheltered (optional)
Hispanic	164	14
Not Hispanic	1,151	73

Data Source

Comments:

Point-in-Time Summary Homeless Population MN-501 - Saint Paul/Ramsey County COC

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

Homeless Families: Wilder Research reports that homeless parents could pay \$477 per month for rent in the metro area. To rent a modest two bedroom unit, Ramsey County workers must earn \$15.01 to \$18.9 per hour, 40 hours per week, all year long. However, the typical renter in Ramsey County earns the equivalent of \$14.26. (*Out of Reach Report 2014*, Minnesota Housing Partnership, March 2014) While homeless families may have higher incomes than homeless single adults, private market housing is still an unattainable goal. Many modest-priced apartments (\$625-\$700 for 1 bedroom, \$700-\$850 for 2 bedrooms) are 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 often severely impacts children’s development. In addition to the trauma of having no stable residence, homeless children often go without basic necessities, such as medical care, meals, and clothing, and experience learning problems. Thus, most homeless residents cannot secure permanent housing especially when government-assisted housing is limited.

Homeless families of veterans: Although over 69% of homeless female veterans and 25% of homeless male veterans reported that they had children under the age of 18, the proportion caring for their children while homeless was substantially lower. Just under 39% of homeless female veterans and 1% of homeless male veterans were accompanied by their children on the night of the Wilder Research statewide survey. (*Homeless Veterans in Minnesota 2012, Statewide Survey of Veterans without Permanent Shelter*, Wilder Research, November 2013)

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

Racial disparities among Minnesota homeless residents remains persistent and severe.

Homeless Families: African-Americans make up 49% of homeless parents in Minnesota. Compared to their representation in the overall Minnesota population, African-American and American Indian families are more likely to be homeless than other racial or ethnic groups. African-Americans are 5% of Minnesota parents, but 49% of homeless parents in Minnesota, while American Indians are only 1% of all Minnesota parents yet 8% of homeless parents. Hispanic (any race) make up 4% of all Minnesota parents, but 8% of homeless parents in Minnesota. (2012 Minnesota Homeless Study, *Homeless Children and Their Families*, Wilder Research, May, 2014)

Homeless Adults 58% of homeless adults were African-American, American Indian, Asian, Hispanic or mixed race were recorded on the day of the statewide survey as compared to 14% of state's overall population of Minnesota adults. Hispanic (any race) make up 4% of all Minnesota adults, but 8% of homeless adults in Minnesota. (2012 Minnesota Homeless Study, Wilder Research, September 2013)

Homeless Youth: 70% of homeless youth were African-American, American Indian, Asian, Hispanic or mixed race recorded on the day of the statewide survey as compared to 11% of state's overall population of youth. In the Twin Cities, metro area, 82% of homeless youth were youth of color. (2012 Minnesota Homeless Study, Wilder Research, September 2013)

Homeless Veterans: About 37% of Minnesota's homeless veterans are persons of color compared with less than 11% of the state's overall population. Particularly over-represented are African Americans in the Twin Cities 7-county area (33%). (*Homeless Veterans in Minnesota 2012, Statewide Survey of Veterans Without Permanent Shelter*, Wilder Research, November 2013)

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

Ramsey County Continuum of Care annually conducts a point-in-time study of sheltered and unsheltered homeless residents. Additionally, every three years since 1991, Wilder Research has conducted a statewide survey of people who are homeless or living in temporary housing programs. 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 additional long-term episodes would be added to those already documented in the Wilder Survey.

Sheltered Homelessness-Single Adults: The key point to note is that Dorothy Day Center Emergency Shelter facility (208 beds-men/first floor; 44 beds-women/second floor) operates at capacity such that there was a need for Catholic Charities and Union Gospel Mission to add more shelter beds to meet the Cold-Weather Overflow Emergency Shelter needs. The shelter demands are so great that, in 2011, Dorothy Day Center turned away people for the first time in its history of operations. In response, Catholic Charities is working with State of Minnesota and the City to build a new larger Dorothy Day Center.

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 as Ramsey County Coordinated Access received 771 total calls from eligible Ramsey County families seeking *housing or shelter* during July-Sept. 2014.

Unsheltered homelessness: It is difficult to determine the actual number of homeless people who are unsheltered on particular day. While the Wilder Research Data Collection Report does extensive surveys of shelters and non-shelter areas, the survey may miss persons who are doubled-up, sleeping outside, or living in unknown locations not typically meant for human habitation. Still, 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 were needed. More importantly, it is important to note that 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:

Statistics are often just numbers.....but statistics often require a community response when:

Homeless Adults/ Homeless Adults Chronically-Homeless Individuals

- 22% of homeless adults-diagnosed with substance abuse disorder, 51% report a chronic health condition; 55% report a significant mental illness
- 48% of long-term homeless have a condition that limits work.

Homeless Families

- Number of homeless families and children is rising; and 51% of homeless children are age 5 or younger

Homeless Youth/Unaccompanied Youth:

- 55% of homeless youth have reported being abused or neglected; and 21% of homeless youth reported as having been attacked or beaten while homeless

Homeless Veterans

- 34% of Iraq/Afghanistan combat veterans have evidence of traumatic brain injury

In response to needs of homeless Saint Paul residents, the City, State of Minnesota, and Catholic Charities are developing a new Dorothy Day Center for which Phase 1 will include 273 shelter beds and 193 single room living units and Phase 2 will include a new Opportunity Center with support services and additional supportive housing. The State of Minnesota, the City, and Beacon Interfaith are working together to develop Prior Crossing – a new 44 unit building for unaccompanied homeless youth and young adults. Much is needed, and much is being done.

For more information about homelessness in Minnesota, please see: *Homelessness in Minnesota, Findings from the 2012 Statewide Study*, (Wilder Research, September 2013) at

<http://www.wilder.org/Wilder-Research/Publications/Studies/Forms/Study/docsethomepage.aspx?ID=1023&RootFolder=%2FWilder-Research%2FPublications%2FStudies%2FHomelessness%20in%20Minnesota%202012%20Study>

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 city 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 are:

- 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. Saint Paul has 23,515* elderly 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 4070 cost-burden elderly homeowners and 5795 cost-burden elderly renters. That said, Saint Paul elderly will need to maintain their homes 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. Saint Paul has approximately 15,601** residents with a cognitive difficulty, and Ramsey County provided intellectual/development disability case management to 3,389 County residents. Saint Paul also has 13,352** residents with an ambulatory difficulty - highlighting the need for accessible-designed housing. In 2013, Ramsey County provided mental health case management to approximately 3769 individuals who could benefit from housing options, such as independent living, group homes, assisted living, or institutional care. Residents with Chemical Dependency issues need sober housing. In contrast, chronically-inebriates need a "Housing First" harm-reduction housing program.

Residents living with HIV/AIDS. According to Minnesota Department of Health, Saint Paul has 1052 residents living with HIV/AIDS.

Residents with Limited English Proficiency. Saint Paul has approximately 26,049** residents who speak English "less than very well."

*2007-2011 CHAS, **U.S. Census - 2013 American Community Survey.

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 will continually 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 Center also reports the need to offer multi-lingual and multi-cultural programs since many Saint Paul elderly are African-American, Latino, and Asian-American. For cost-burdened homeowners, home improvement programs and community services, such as utility assistance, may be needed in order for the elderly to maintain their homes. That said, cost-burdened renters will always need affordable rental housing.

Housing and supportive needs-Persons with Developmental, Physical, Mental Health Challenges, and Persons with Chemical Dependency. In the past, Ramsey County had enough group homes for persons with special needs. Now legislative directives will require that these residents seek independent living arrangements. Thus, there is a need for affordable housing-with support services. The State 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, and affordable housing is a priority concern for individuals with serious and persistent mental illness, especially for those individuals whose social security income is insufficient to pay rent. Persons with chemical dependency need affordable sober housing and safe haven for chronically-inebriated.

Housing and support needs for Persons with Limited English Proficiency (LEP). Saint Paul's new Americans and newly-arrived refugees need stable affordable housing that is adequate for their family size. Since, refugees are simultaneously learning a new language, new culture, and marketable job skills, LEP residents need to be able to access housing information in the primary language. In response, the City has multi-lingual staff to address housing needs.

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

Total Population. According to the State of Minnesota Health Department, 1052 residents with HIV/AIDS live in Saint Paul.[1] Additionally, based upon past interviews, the Minnesota AIDS Project estimates that 76 percent of the persons living with HIV/AIDS own their own home or rent apartments. On the other hand, it can be extrapolated that 33 percent of the persons living with HIV/AIDS are

precariously-housed. Additionally, approximately 33 percent of persons living with HIV/AIDS are families.

Persons living with HIV/AIDS most often have lower incomes. According to the HIV Needs Assessment[2] conducted by the Minnesota HIV Services Planning Council, eighty-four percent (84 percent) of the Minnesotans living with HIV reported incomes of \$24,000 or less. For medical reasons, persons living with HIV may have difficulty maintaining long-term employment. Consequently, their incomes are often reduced to Social Security, which is approximately \$684/month for a single individual.

Need. Most important, persons with HIV/AIDS need affordable housing. According to the 2010-2011 Needs Assessment prepared for the Minnesota HIV Services Planning Council, 12 percent of all HIV-positive individuals interviewed reported that living in nonsubsidized housing, and approximately 30 percent of those interviewed are paying more than 30% of their income for housing. Virtually, all adults receiving 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.

Discussion:

Summary of service of Special Needs in our diverse community

While the City of Saint Paul is aggressively providing financing for affordable housing and affordable supportive housing, the overall demand remains overwhelming, especially in light of changing state and federal budgetary priorities. The City recognizes the diversity of its citizens. During the next five years, the City will continue to serve low and moderate income residents by offering its current housing programs, and the City is actively working with its funding partners to produce affordable housing and affordable supportive opportunities – even in the current economic climate. Moreover, 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:

The City has over 30 recreational facilities (which include senior centers, youth centers, and neighborhood facilities), 4000 acres of parkland, more than 80 tot lots, a zoo, 4 golf courses, and 13 library facilities located throughout the City, as well as a number of parking facilities which are primarily located in the downtown area. There are also over 300,000 trees on City property. All of this property requires periodic improvement, expansion or replacement. Recently, eight of the recreation center buildings were evaluated to be of low quality. Parks has estimated the costs of its needed improvements to be between \$8.5 and \$11 million dollars over each of the next three years, tapering off to approximately \$3 million in the following consecutive 2 years. The Saint Paul Public Libraries has approximately \$5 million in modernization projects to be performed at 3 of its facilities.

City bond funds are used to finance many of these activities, but CDBG funding is also used to finance 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 of the Saint Paul City Departments is responsible for assessing its needs. The Parks and Recreation Department hired a consultant in 2010 to develop City of Saint Paul Parks and Recreation System Plan. The development of this plan was based largely on community and stakeholder input. A citizen survey was conducted, a series of community meetings were held and an online questionnaire was used to gather input and develop priorities.

The Saint Paul Public Libraries also enlisted a consultant to assist with their strategic planning process in 2010. This process was spearheaded by an advisory committee that included representatives of the business, education, non-profit, arts and culture and media communities. The planning process solicited input from the broader community through an online survey and multiple community drop-in sessions. Over three dozen community stakeholders were interviewed as well as elected officials and library staff. In March of 2011, the Saint Paul Public Libraries engaged a consultant to perform a facilities assessment and provide cost estimates for upcoming improvements.

Describe the jurisdiction's need for Public Improvements:

The City has nearly \$3 billion worth of infrastructure (850 miles of streets, 1,100 miles of sidewalks, 1,250 miles of sewers, 331 bridges, and 32,000 street lights) that it maintains and operates. The repair and replacement of this infrastructure is very important to the City, and these types of improvements are predominantly financed with a number of 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 Capital Improvement Budget (CIB) process to develop its capital plan and establish priorities. The CIB process is a biannual process. District Councils appoint citizens to the CIB task forces organized by type of project: Community Facilities, Streets and Utilities, and Residential and Economic Development. Task force members score proposals, while City departments rank their proposed projects in priority order and offer comments on all proposed projects. District Councils also prioritize projects that are completely or partially in their districts. Task force scores, City department rankings, and District Council rankings are then transmitted to the CIB Committee, a board comprised of citizen volunteers. The CIB Committee reviews the input from all groups and creates a list of recommended projects. These recommendations are transmitted to the Mayor for review and approval by the City Council. Several public works projects are submitted each cycle and are placed on the priority list due to the leverage of additional outside financing.

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 the City than the City/County collaboration is able to provide, City funding is also used (including up to the maximum allowed 15 percent of CDBG funds) to provide additional public services for the almost 300,000 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 planning process, the City is also seeing a need for service-enriched housing, home buyer education, tenant and landlord counseling, additional senior services, and greater access to information for citizens 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 planning process in January, specifically to weigh in on the needs and priorities of their districts.

City staff also consulted with a number of public service providers and agencies, including Ramsey County, on the status of their current levels of services, unmet needs and projected needs.

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, duplexes, triplexes, apartments, and condominiums. One-unit detached housing, the traditional single-family house, accounts for 50% of the housing units in the City. Nearly 70% of the owner-occupied units are three or more bedrooms, while one-bedroom apartments represent over 40% of the rental units.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	60,004	50%
1-unit, attached structure	5,518	5%
2-4 units	13,859	11%
5-19 units	15,074	12%
20 or more units	26,069	22%
Mobile Home, boat, RV, van, etc	441	0%
Total	120,965	100%

Table 27 – Residential Properties by Unit Number

Data Source: 2007-2011 ACS

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	323	1%	3,477	7%
1 bedroom	2,944	5%	22,335	42%
2 bedrooms	15,292	26%	18,063	34%
3 or more bedrooms	39,892	68%	9,556	18%
Total	58,451	100%	53,431	101%

Table 28 – Unit Size by Tenure

Data Source: 2007-2011 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 nonprofit housing advocacy organization, there are 497 projects (not including those public housing projects) that have received federal, state, or local financial assistance in the City of Saint Paul. Unit number and affordability levels have been recorded for 236 of those projects. Of the 11,612 housing units in these projects, 9,622 are affordable—2,992 for households earning up to 30%, 1,825 up to 50%, 4,381 up to 60%, and 471 units

up to 80% of AMI. The breakdown of unit types from this reported data is 590 efficiencies, 3,877 one bedrooms, 3,060 two bedrooms, 731 three bedrooms, and 41 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.

Saint Paul has approximately 1,672 units that could be lost between 2015 and 2019 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; there is not an expectation that any of the units will be lost. According to information maintained by HousingLink, there are 24 LIHTC- and HUD-funded housing developments with earliest affordability contractual release between these dates. These properties contain 942 units of affordable housing—626 affordable to households up to 30%, 130 units affordable to households up to 50%, and 186 units affordable to households up to 60% of AMI. In addition, information provided by Minnesota Housing identifies ten developments that have 730 project-based Section 8 vouchers with contracts set to expire between 2015 and 2019. 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 owner-occupied while the supply of larger rental units is more limited. The converse is true for smaller households where rental units are ample while smaller ownership opportunities are more limited. The CHAS data does not break out available senior housing opportunities or housing that has been designed with the needs of handicapped householders. Through the stakeholder outreach process, groups identified a need for universally designed, multifamily units that can accommodate special need households as well as seniors and the opportunities to allow seniors in single-family houses to age in place.

Describe the need for specific types of housing:

Data referenced in the previous question on the availability housing units suggests the highest priority needs for specific types of housing are:

- Affordable rental units for large families at extremely low and low income levels
- Affordable rental units for small families and single-person households at extremely low and low income levels
- Universally designed rental and ownership housing to accommodate seniors and the disabled population

Discussion

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

Introduction

As described in Section NA-10 of this Plan, the predominate housing-related problem in the City of Saint Paul is the cost of housing for its extremely low to moderate income citizens. Between 2000 and 2011, median home values increased by 89% and median rents increased by 35% while median household income increased by only 18%. This section examines housing cost, rent paid, housing affordability, and monthly rents paid through federal programs.

Cost of Housing

	Base Year: 2000	Most Recent Year: 2011	% Change
Median Home Value	105,000	198,100	89%
Median Contract Rent	524	709	35%

Table 29 – Cost of Housing

Data Source: 2000 Census (Base Year), 2007-2011 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	11,911	22.3%
\$500-999	32,680	61.2%
\$1,000-1,499	7,210	13.5%
\$1,500-1,999	1,232	2.3%
\$2,000 or more	398	0.7%
Total	53,431	100.0%

Table 30 - Rent Paid

Data Source: 2007-2011 ACS

Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	7,490	No Data
50% HAMFI	24,250	3,855
80% HAMFI	41,955	13,155
100% HAMFI	No Data	23,335
Total	73,695	40,345

Table 31 – Housing Affordability

Data Source: 2007-2011 CHAS

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	592	736	920	1,296	1,529
High HOME Rent	610	756	946	1,332	1,525
Low HOME Rent	610	756	945	1,091	1,217

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 the City of Saint Paul. The 2007-2011 CHAS data shows that there are only 7,490 rental housing units affordable to households earning 0 – 30% of AMI with approximately 20,000 households at this income level living in rental housing. For owner-occupied housing, there is a lack of housing that is affordable to households earning 0-50% of AMI—approximately 3,855 ownership units are affordable to 9,594 of households at 0-50% of AMI. This directly correlates to the significant number of households within these groups experience housing cost burden.

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

The cost of housing data provided above show that the median home value in Saint Paul has increased 89% and median rent increased 35% between 2000 and 2011 while household income only increased 18%. 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 the 2007 – 2011 CHAS data, the median monthly rent was \$709, which closely aligns 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 these larger units.

Discussion

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 2007 – 2011 CHAS dataset 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 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.

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	17,298	30%	26,364	49%
With two selected Conditions	764	1%	2,165	4%
With three selected Conditions	0	0%	143	0%
With four selected Conditions	0	0%	24	0%
No selected Conditions	40,389	69%	24,735	46%
Total	58,451	100%	53,431	99%

Table 33 - Condition of Units

Data Source: 2007-2011 ACS

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	1,938	3%	4,171	8%
1980-1999	3,705	6%	7,230	14%

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
1950-1979	15,529	27%	20,670	39%
Before 1950	37,279	64%	21,360	40%
Total	58,451	100%	53,431	101%

Table 34 – Year Unit Built

Data Source: 2007-2011 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	52,808	90%	42,030	79%
Housing Units build before 1980 with children present	780	1%	2,115	4%

Table 35 – Risk of Lead-Based Paint

Data Source: 2007-2011 ACS (Total Units) 2007-2011 CHAS (Units with Children present)

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	1,400	86	1,486
Abandoned Vacant Units	1,160	86	1,246
REO Properties	945	72	1,017
Abandoned REO Properties	783	56	839

Table 36 - Vacant Units

Alternate Data Source Name:

Vacant and REO properties

Data Source Comments:

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 community engagement process. The condition information provided through the 2007 – 2011 CHAS data identifies a very small number of housing units in Saint Paul suffer from the facilities deficits (e.g. lack of plumbing or complete kitchens) reported. However, age of the City’s house stock is an overall indicator for the need to bolster property maintenance efforts. Ninety-one percent 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 the City. From a rental perspective, 80% of the units were built before 1980 with 40% 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 94,838 units that were built before 1980. Approximately 42,000 of those are occupied by low or moderate income families.

Discussion

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

Introduction

Public Housing: Saint Paul Public Housing Agency (St. Paul PHA) provides 4,253 HUD-subsidized public housing rental units (consistently fully occupied over 99%) to approximately 10,000 low income residents. Saint Paul PHA also administers its Section 8 Housing Choice Voucher Program to assist 4000 eligible low-income households living in private-market apartments. Both Saint Paul Public Housing and its Section 8 Housing Voucher Program have consistently received HUD's "High Performer" ratings.

With an annually updated 5 year Plan, Saint Paul PHA uses its HUD-funded Capital Fund Program grants (\$9 million annually) to maintain and improve Saint Paul PHA properties, including renovating family and hi-rise apartments, creating new hi-rise community rooms/kitchens, and enlarging its community centers.

At the same time, Saint Paul PHA strives to provide excellent property management and maintenance for 16 hi-rises, 4 family housing developments and its 400+ scattered sites 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 also provides resident service programs, including "welfare to work" programs, homeownership programs, community policing, assisted living services for frail elderly and disabled residents, and others.

Publicly-Assisted Housing. Saint Paul also has approximately 12,201 publicly-assisted affordable housing units (including supportive housing units and shelter beds)[1] such that approximately 30% of all St. Paul renters receive some type of affordable housing benefit. Furthermore, Saint Paul's Affordable Housing Policy requires that city-financed rental projects have 10% of the units affordable at 30% area median income (AMI) and 10% affordable units at 50% AMI as a condition of receiving city financing. The City's Locational Choice Policy and Saint Paul HRA Low Income Housing Tax Credit Program directs "the City toward a more equitable distribution of affordable housing throughout the City." During 2013-2104, the City provided financing to preserve, renovate, or construct affordable housing– using low-income housing tax credits, federal funds, such as CDBG, NSP, HOME, TIF, and City's STAR funds. [2]

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	76	4,248	4,122	459	3,663	411	80	977
# of accessible units									
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

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:

Saint Paul PHA owns and manages 4259 of public housing units comprised of 2554 hi-rise units and 1705 family units, including 403 scattered site single family houses and duplexes. Saint Paul PHA has consistently achieved "Higher Performer" status under HUD's Public Housing Assessment System, which ensures that 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.

Much of Saint Paul Public Housing units have been improved under HUD-funded Capital Fund Program as follows:

- Comprehensive Modernization of McDonough Homes (484 family dwelling units - \$35 million)
- Comprehensive Modernization of Dunedin Terrace (88 family units Phase I of 9 four-unit buildings - \$3.15 million Phase II will modernize 3 more four-unit buildings to be completed in 2014.)

- Replacement of the fire alarm systems and installation of fire suppression sprinklers in all of the PHA's 16 hi-rises (completed in 2013 at a cost of approximately \$8.5 million).
- Construction of a new 6 unit townhome building at Roosevelt Homes (\$1 million).
- Construction of a new 4 unit townhome building to be built at Mt. Airy Homes
- Other improvements include elevator modernizations, roof replacements, exterior brick repair, energy and water conservation improvements, and modernization of the PHA's scattered site homes on vacancy.

Public Housing Condition

Public Housing Development	Average Inspection Score

Table 38 - Public Housing Condition

St. Paul Public Housing Agency FACT SHEET



FACTS About Our Public Housing Program

- The PHA owns and manages 4259 units of public housing, comprised of:
 - 2554 Hi-Rise units
 - 1705 Family units, including 403 Scattered Site single family homes and duplexes
- The insured value of the PHA's property is \$602 million.
- In FY 2014, the PHA achieved "High Performer" status under PHAS for the 24th consecutive year.
- The PHA has maintained a 99% occupancy rate for 19 consecutive years.
- The PHA prepared and re-rented vacant units in an average of 16.66 days in FY 2014.
- 100% of units were inspected for housekeeping and preventive maintenance in FY 2014.
- The PHA collects over 99% of rents.
- The annual agency-wide financial and compliance audit of FY 2014 was completed with no adverse findings (only one finding in the last 18 years).
- 29,403 maintenance work orders (emergency and non-emergency) were completed in FY 2014.
- The PHA attained a 100% resident satisfaction rating on maintenance work orders in FY 2014.
- The PHA owns four community centers that provide a total of nineteen different services to residents and the surrounding communities.
- Since 1991, the PHA has invested \$12.24 million in ACOP ("A Community Outreach Program"), a community policing partnership with the Saint Paul Police Department.
- In 2014 the PHA had 15 Officers-In-Residence (OIR) living in its Hi-Rises.
- The PHA oversees a Congregate Housing Services Program (CHSP) in five of its Hi-Rises. Program capacity is 125. Residents are assisted with independent living, thereby helping them avoid premature nursing home placement.

Mission Statement

"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."

FACT

The PHA provides 8,000+ affordable homes to over 21,000 people.

FACT

The PHA has been an independent governmental unit since 1977.

FACT

The PHA is governed by a seven-member Board of Commissioners appointed by the Mayor and approved by the City Council.

FACTS About Our Housing Choice Voucher Program

The PHA administers 4589 vouchers, totalling \$38 million, and has been a “High Performer” under HUD’s Section 8 Management Assessment Program (SEMAP) for thirteen years running.

Most Section 8 vouchers are “Tenant-Based” and move with the renter. “Project-Based Vouchers” (PBV) are assigned to particular units and buildings.

“Mixed income” housing provides some PBV-subsidized units in market-rate rental housing buildings.

Beginning in 2000 the PHA Board has approved 26 requests for project-based voucher assistance totaling 485 units in 23 separate projects (3 other projects were canceled and the current total is 483 units). More than half of the units (295) are “supportive housing”:

1. **Sibley Park Apartments.** Mixed income/new construction; 24 PBV; 2002.
2. **Liberty Plaza Apartments.** Affordable housing/major rehabilitation; 95 PBV; 2002.
3. **Jackson Street Village.** Supportive Housing/new construction; 24 PBV; families with children, homeless or near homeless, and recovering from chemical dependency; 2003.
4. **Families First I-II-III.** Supportive Housing/existing housing; 20 PBV; families with children, homeless or near homeless, recovering from chemical dependency, current or recent MFIP recipients; 2003-2004 (3 stages).
5. **Crestview Apartments/New Foundations I-II.** Supportive Housing/existing housing; 44 PBV; families with children, homeless, recovering from chemical dependency, current or recent MFIP recipients; 2002-2005 (2 stages).
6. **Sibley Court Apartments.** Mixed income/new construction; 25 PBV; 2003.
7. **Seventh Landing.** Supportive Housing/new construction; 12 PBV; homeless youth aging out of foster care system; 2003.
8. **Rivertown Commons.** Mixed income/existing housing (6 supportive); 20 PBV; 2002.
9. **Straus Building.** Mixed income/major rehabilitation; 10 PBV; 2003.
10. **Upper Landing.** Mixed income/new construction; 15 PBV; 2002.
11. **St. Christopher Place.** Supportive Housing/existing housing; 14 PBV Single Room Occupancy (SRO); single adult men and women; 2004.
12. **YWCA.** Supportive Housing/existing housing; 36 PBV; single parent households with children who are former or current MFIP participants; 2003.
13. **Martin Luther King Court.** Supportive Housing/existing housing; 8 PBV; homeless or near homeless families with children of which at least one person has been diagnosed with HIV/AIDS; 2004.
14. **UniDale Apartments.** Supportive Housing/new construction; 20 PBV (15 supportive); chronically homeless families with children; 2006.

15. **Sankofa Apartments.** Supportive Housing/rehab; 4 PBV; Long-term homeless adults pregnant or parenting; 2008.
16. **Delancey Apartments.** Supportive Housing/rehab; 13 PBV; Long-term homeless families with disabilities; 2009.
17. **Winnipeg Apartments.** Supportive Housing/new construction; 6 PBV; Long-term homeless families and individuals; 2009.
18. **Cleveland-Saunders.** Supportive Housing/existing; 10 PBV; Long-term homeless families; 2009.
19. **Lexington Commons.** Supportive Housing/rehab; 47 PBV; Long-term homeless individuals; 2010.
20. **Renaissance Box.** Supportive Housing/rehab; 10 PBV; Long-term homeless families; 2011.
21. **Fort Road Flats.** Supportive Housing/new construction; 8 PBV; Long-term homeless families; 2013.
22. **Ujamaa Housing.** Supportive Housing/rehab; 12 PBV; homeless young males without family support; 2013.
23. **Western U Plaza (formerly Old Home Plaza).** New construction/rehab/Supportive Housing; 6 PBV; in development phase [2015].

FACT

In the Section 8 Program, the average tenant payment for rent plus utilities is \$320/month.

The average cost per voucher (rent subsidy plus administration) is \$715/month.

FACT

In the Public Housing Program, the average tenant payment for rent plus utilities is \$357/month.

The total federal subsidy, including operating and capital improvements, is approximately \$387/month.

FACTS About Our Capital Fund Program (CFP)

- The PHA's FFY 2014 CFP allocation was \$6.7 million.
- In 2014 the PHA administered approximately \$25 million in open CFP grants.
- Contracts with minority-owned business enterprises in FY 2014: 3.1% of operating budget and 13.9% of capital fund budget.
- Contracts with businesses owned by women or persons with disabilities in FY 2014: 22.4% of operating budget and 12.4% of capital fund budget.
- To date, the PHA has awarded a total of \$8.7 million to Section 3 business concerns.
- Starting in 1991, the PHA invested \$8 million in life safety improvements by installing fire sprinklers and upgrading the fire alarm systems in all 16 PHA-owned Hi-Rises.

FACT

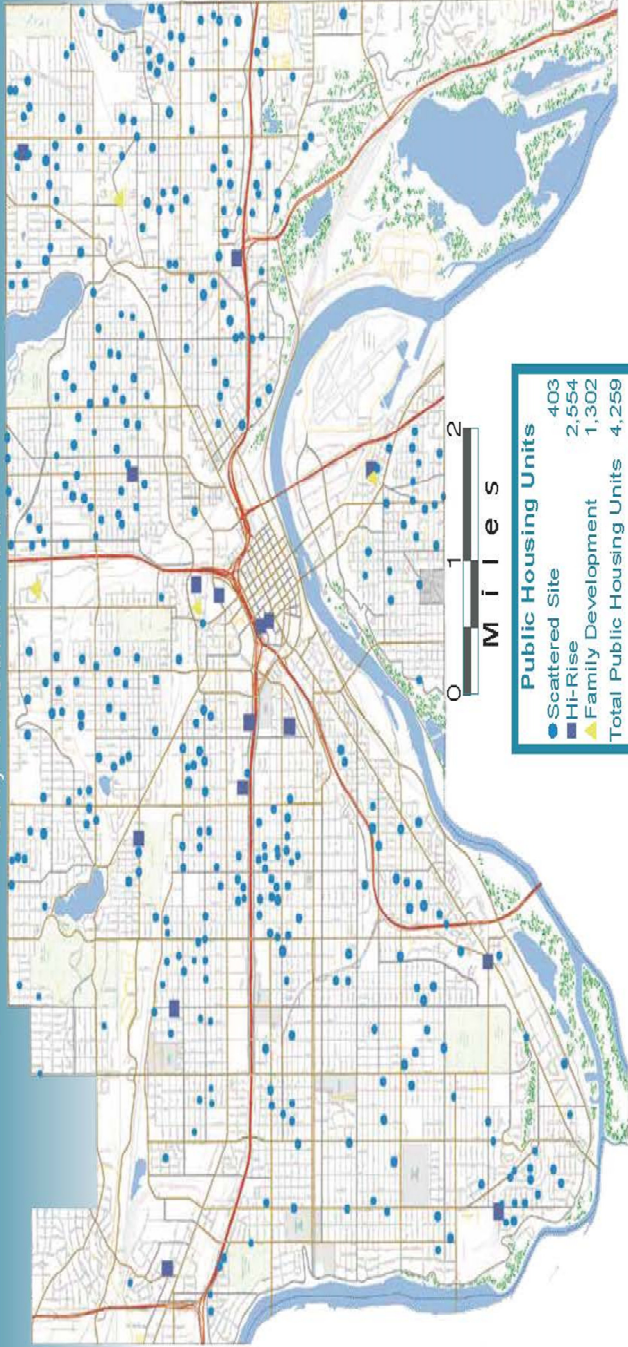
The average federal subsidy for operating costs is \$255/month.

The average federal subsidy for capital improvements is \$132/month.

Saint Paul Public Housing Fact Sheet Pg 3

PHA Housing Sites

City of Saint Paul



Hi-Rise Apartments for Seniors, People with Disabilities and Singles

	Units
Central Hi-Rise	144
Cleveland Hi-Rise	144
Dunedin Hi-Rise	143
Edgerton Hi-Rise	221
Exchange Hi-Rise	194
Front Hi-Rise	151
Hamline Hi-Rise	186
Iowa Hi-Rise	148
Montreal Hi-Rise	185
Mt. Airy Hi-Rise	153
Neill Hi-Rise	104
Ravoux Hi-Rise	220
Seal Hi-Rise	144
Valley Hi-Rise	159
Wabasha Hi-Rise	171
Wilson Hi-Rise	187

Family Housing Developments

	Units
Dunedin Terrace	104
McDonough Homes	580
Mt. Airy Homes	298
Roosevelt Homes	320
Family Scattered Site Housing	403

Total Hi-Rise Units	2,554
Total Housing Development Units	1,302
Family Scattered Site Housing Units	403
Total PHA Housing Units	4,259
Total Section 8 Units	4,589
Total PHA-Owned and Section 8 Units	8,848

Saint Paul Public Housing Agency

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Graphic Design & Layout by:
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Describe the restoration and revitalization needs of public housing units in the jurisdiction:

Saint Paul PHA annually receives HUD Capital Fund Program (CFP) grants for the maintenance and improvement of Saint Paul PHA properties. Saint Paul PHA's Five Year-Capital Fund Program Action Plan identifies how the Saint Paul PHA will use CFP grant funds to improve its public housing units including the following projects:

Ravoux Hi-Rise: PHA must install new plumbing at Ravoux Hi-Rise (220 unit building built in 1970) which sustained building damage caused by serious plumbing problems. The project will replace the building's original galvanized hot and cold water plumbing supply lines. The estimated project costs is \$5,765,716 to be partially funded with PHA's CFP grants (2015 and 2016) of \$1,080,568, and Saint Paul PHA will apply to Minnesota Housing Finance Agency (MHFA) for a \$4,685,148 loan to pay the remaining costs. This loan would be considered in the category of preservation of affordable rental housing with "critical physical needs". Work could begin during 2016.

Mt. Airy Homes: Capital improvements include the following: removal of existing wall stucco, repair of wall sheathing and studs, window replacement, roof shingles soffits, fascia, gutters and downspouts replacements, and installation of new cementitious siding and trim. The estimated total cost of Mt. Airy Homes Exterior Modernization Project - Phase I and II is \$11,541,535 or \$42,432 per dwelling unit to be partially funded with \$2,670,705 of Capital Fund and a \$8,870,830 MHFA loan.

Mt. Airy Home Phase 1 will modernize the exteriors of the 30 family dwelling units at Mt. Airy Homes at a cost of \$1,189,000 to be funded with PHA CFP grants.

Mt. Airy Homes Phase 2: Saint Paul PHA is applying to MHFA for a \$8,870,830 loan to partially pay exterior modernization costs for the remaining 242 Mt. Airy Homes family dwelling units. Pending loan approval, Phase II exterior modernization could start in 2016. This loan is to be considered in the category of preservation of affordable rental housing with "critical physical needs".

Dunedin Terrace Modernization - Phase 3 will convert flat roofs to hipped roofs, replacing windows, replacing second floor siding, removing brick wing walls, totally replacing kitchens and bathrooms, and other miscellaneous interior and site work. Four Phase 3 buildings contain three-bedroom units, and one Phase 3 buildings contains five-bedroom units. The estimated project cost is \$2,452,300 for capital improvements at five fourplex buildings (20 dwelling units). Almost one-half of the cost will be paid by a \$1.2 million forgivable loan under MHFA's Publicly Owned Housing Program (funded by General Obligation bonds), and the 2014 and 2015 Capital Fund Program has sufficient funds to complete this work.

McDonough Homes – new construction: PHA will construct two new six-plex townhomes at McDonough Homes for \$2,839,000. One building will contain three two-story, two-bedroom apartments and three single-level two-bedroom apartments. The second building will contain four two-story, two-bedroom apartments and two single-level two-bedroom apartments. All five single-level

units will be accessible for persons with disabilities. The two-story units will have full basements and the accessible units will be built on concrete slabs on grade level, with no basement or steps. A MHFA loan will provide \$1,080,000 toward the construction cost and the balance of the funding will come from the 2014 and 2015 CFP grants.

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 preserve the valuable 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.

Saint Paul PHA has a long history of making “green” and environmentally sustainable capital improvement to its 16 hi-rises, 4 family housing developments and its 400+ scattered sites homes, such as:

- Installation of District Energy St. Paul heating at four PHA hi-rise apartment buildings and 298 Mt. Airy townhouses. Installation of District Energy heating and cooling at PHA’s Central Office (downtown St. Paul).
- Designed PHA’s Central Office to exceed current energy code standards, installation of stormwater management, and location with easy access to public transportation.
- Conducts energy audits of its properties.
- Installation of energy improvements to reduce energy and water usage, such as installing water-saving faucet aerators, reduced-flow shower heads, water-conserving toilets, lighting retrofits, weatherstripping, and additional insulation. Installation of solar-assisted heating in one hi-rise and installing storm water management improvements at McDonough Homes, funded by federal stimulus funds.
- Installation of bathroom and kitchen exhaust fans to improve indoor air quality of PHA family units.
- Installation of a computerized energy management system that conserves energy, reduces emissions, and promotes resident comfort
- Replacement of the fire alarm systems and installation of fire suppression sprinklers in all of the PHA’s 16 hi-rises was completed in 2013 at a cost of approximately \$8.5 million.

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:

Saint Paul's PHA has approximately 4,259 publicly-assisted affordable housing units (including supportive housing units and shelter beds) and approximately 4,589 Section 8 vouchers, such that approximately 30% of all PHA renters have affordable housing benefits.

Public Housing:

Saint Paul PHA has maintained its “High Performer” status under HUD’s Public Housing Assessment System (PHAS) for 24 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 Plan and an Annual Plan to use its HUD Capital Fund Program (CFP) grants (approximately \$9 million annually) to maintain and to renovate its family and hi-rise apartments, including 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.

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, such as CDBG, NSP, HOME, TIF, and City’s STAR funds. Still, with limited financial capacity, the City must partner with HUD, Minnesota Housing Finance Agency, and private foundations to financing affordable housing developments.

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

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

Introduction

This section includes inventories of the facilities and services that meet the emergency shelter, transitional housing, and permanent supportive housing needs of homeless persons within the City of Saint Paul and Ramsey County. Discussions of ESG, Continuum of Care, and other services for homeless persons follow.

Section 91.210(c) Inventory of Homeless Facilities and Services includes citywide inventories of emergency shelters for adults and families, domestic violence shelters, emergency/transitional/permanent supportive housing for youth, transitional housing, and permanent supportive housing. Additionally Section 91.210(c) Inventory of Homeless Facilities and Services identifies the programs and services that can empower homeless residents move toward self-sufficiency.

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)	268	0	459	1,115	16
Households with Only Adults	401	30	139	1,174	199
Chronically Homeless Households	0	0	0	1,092	135
Veterans	0	0	0	6	0
Unaccompanied Youth	27	0	81	58	44

Table 39 - Facilities and Housing Targeted to Homeless Households

Data Source Comments: Ramsey County Continuum of Care - Inventory Lists

HOUSING NEEDS AND INVENTORY OF HOMELESS FACILITIES AND SERVICES Pg 1

HOUSING NEEDS AND INVENTORY OF HOMELESS FACILITIES AND SERVICES Pg 1

HOUSING NEEDS AND INVENTORY OF HOMELESS FACILITIES AND SERVICES Pg 2

HOUSING NEEDS AND INVENTORY OF HOMELESS FACILITIES AND SERVICES Pg 2

Category	Count	Notes
Emergency Shelter	100	
Transitional Housing	200	
Permanent Housing	300	
Other	50	
Total	650	

HOUSING NEEDS AND INVENTORY OF HOMELESS FACILITIES AND SERVICES Pg 3

Category	Count	Notes
Emergency Shelter	100	
Transitional Housing	200	
Permanent Housing	300	
Other	50	
Total	650	

HOUSING NEEDS AND INVENTORY OF HOMELESS FACILITIES AND SERVICES Pg 4

Category	Count	Notes
Emergency Shelter	100	
Transitional Housing	200	
Permanent Housing	300	
Other	50	
Total	650	

HOUSING NEEDS AND INVENTORY OF HOMELESS FACILITIES AND SERVICES Pg 5

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

Commitment to Collaboration. In order to ensure full range of services, without duplication, Saint Paul has a coalition of 25+ community services to ensure full ranges of services, without duplication, including Housing Link, Saint Paul Area Coalition for the Homeless, Ramsey County Family Homelessness Prevention Assistance Program Advisory Committee, Ramsey County Continuum of Care, and affordable supportive housing providers.

Key collaboration services included, but are not limited to:

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

Agencies/Programs include: Ramsey County Human 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, St. Paul WaterWorks Program, HouseCalls, United Way, Southern Minnesota Regional Legal Services Project Home.

Homelessness Prevention Programs that assist households secure and maintain housing:

Agencies/Programs include: SMRLS Project Hope, St. Paul Library Outreach, Saint Paul CityLiving Home Loan Program (home improvement loans), Dispute Resolution Center, 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 Dorothy Day Center, Neighborhood House and faith communities

Health Care: West Side Clinic and City/County Public Health - federally-funded health service programs, including health screenings at City's emergency shelters. 5 community clinics include American-Indian Health Center, Family Tree, Model Cities Health Center, North End Medical Center, and West Side Health Center. AIDS and STD testing and treatments are available at Face to Face Clinic, MN AIDS Project, Model Cities Health Center, and Ramsey County Public Health Division. Health Care for the Homeless provides medical services to homeless residents. Saint Catherine University Public Health Nursing students provide supervised in-home services to residents of the YWCA Saint Paul's transitional housing program

Furniture Programs - Goodwill, St.Vincent's Disabled Americans, Bridgings.

Personal Care: Showers and laundry services at Dorothy Day Center, and Health Care for Homeless

Job and Employment Training. Ramsey Count Workforce Solutions, City’s 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. Additional, Title 1 provides some tutoring and related educational services to children living in transitional housing

Mental Health Services: Ramsey County Community Services, South Metro Human Service, 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.

See *Housing Needs and Homeless Facilities and Services/ Inventory of Homeless Facilities and Services* Table attached. This table identifies needs of homeless adults, homeless families, and homeless youth. Additionally, *Inventory of Homeless Facilities and Services* includes citywide inventories of emergency shelters for adults and families, domestic violence shelters, emergency/transitional/permanent supportive housing for youth, transitional housing, and permanent supportive housing. Additionally Table 1 identifies the programs and services that can empower homeless residents move toward self-sufficiency.

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 city 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

Supportive Housing needs -Elderly and Frail Elderly-Public Housing Residents, Persons with Developmental, Physical, Mental Health Challenges, Persons with Chemical Dependency and Persons with HIV/AIDS. Saint Paul elderly and frail elderly residents will 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) are requiring 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 the City of 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 Loan Fund** (home improvements, energy conservation, accessibility)
- **City's 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.** Nursing Facilities are long-term care facilities providing nursing services, rehabilitative care and assistance meeting daily living needs of individuals with physical disabilities.
- **State of Minnesota Waivered Services Program** (environmental modifications and housing placement assistance).
- **PHA /Accessible Space New Beginnings-Brain Injury Program.** 24-hour personal care attendant service and support services for residents who sustained brain injuries.
- **Minnesota Department of Human Services – Rule 34 – residential facilities.** persons with developmental disabilities:
- **Case Management Services.** Ramsey County Community Human Services provides case management services to residents with developmental disabilities, resident with chemical dependency, residents with mental health challenges.
- **ARC Minnesota.** (services to persons with developmental disabilities).
- **CBDG-funded Block Nurse Program**
- **HOPWA** (housing with support services for persons living with HIV/AIDS)

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

Ramsey County Community Human 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 South Metro Human Services, Mental Health Resources, and Guild, Inc. Ramsey County Continuum of Care works closely with County staff, State Department of Human Services, the ACCESS team, to ensure that there are housing solutions before a

resident is discharged from a mental-health treatment facility. Additionally, the County manages an entire floor at Mary Hall to provide intensive case management services for people with serious mental illness and the County administers the state-funded Group Residential Housing Program.

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. A statewide program operated in 43 counties, Bridges 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)

All housing reports and housing surveys identify the need for affordable housing. That said, Saint Paul will continue to finance affordable housing. More specifically, in 2015-2016, the City, State, and Catholic Charities are working together to build a new Dorothy Day Center to include 278 shelter beds and 193 single-room living units which will provide supportive housing opportunities for persons challenged with developmental disabilities and persons challenged with mental health issues. 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.

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))

- in 2015-2016, the City, State, and Catholic Charities are working together to build a new Dorothy Day Center including 193 single-room living units which will provide some supportive housing opportunities for persons challenged with developmental disabilities and persons challenged with mental health issues.

- In 2015, the City will continue to finance multi-family affordable housing developments that must also comply with ADA requirements - which provide additional opportunities for persons with physical challenges.
- In 2015, the Fair Housing Implementation Council, (of which Saint Paul is a member) may issue a Request for Proposal for best-practices for apartment management when landlords have apartment residents with mental health issues.
- In 2015-2016, the City is working with Catholic Charities to develop a new Dorothy Day Opportunity Center which will assist homeless residents as well as residents with special needs.
- The City may be working with private housing developers and non-profit housing developers to develop senior housing alternatives.

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

Negative Effects of Public Policies on Affordable Housing and Residential Investment

The City has approximately 16,460 households (36 percent of all City renters) who currently receive some housing assistance, including 12,228 publicly-assisted housing units and 4,589 Section 8 vouchers.[1] Yet, the biggest barrier to securing affordable housing is that many households lack sufficient incomes to pay the rents of modestly-priced apartments[2] and the lack of affordable housing opportunities.

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

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

In response, the City’s Affordable Housing Policy requires that city-financed rental projects have 10% of the units affordable at 30% AMI and 10% of the units affordable at 50% AMI. Furthermore, the City’s Locational Choice Policy and the City’s Low Income Housing Tax Credit Selection Process encourage “a more equitable distribution of affordable housing” citywide. Even with seemingly insurmountable barriers, the City has partially financed the preservation, renovation, or new construction of 275 affordable rental housing units– using combined financing, such as low-income housing tax credits, federal funds, such as CDBG, NSP, HOME, TIF, and City’s STAR funds.

Still, the City needs federal and state support to finance affordable housing developments. Therefore, the lack of sufficient federal funding and sufficient allocation of low income housing tax credits – as public policies – has negative effects on affordable and residential investments. In 1975, the City received CDBG funding of \$18,835,000. Forty years later, the City may receive CDBG funding of \$6,384,098. Similarly, the City received HOME funds of \$2,316,000 in 2000; the City may receive \$1,427,984 in 2015. At the same time, the State of Minnesota may reallocate a portion of the City’s Low Income Housing Tax Credits. In the face of increasing need, the City has less federal funds and may have less low income housing tax credits to finance affordable housing and residential investment

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

Introduction

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	265	221	0	0	0
Arts, Entertainment, Accommodations	13,090	14,586	13	12	-1
Construction	2,210	4,752	2	4	2
Education and Health Care Services	25,067	42,835	26	35	9
Finance, Insurance, and Real Estate	9,832	12,662	10	10	0
Information	2,684	3,137	3	3	0
Manufacturing	10,141	9,045	10	7	-3
Other Services	4,799	6,874	5	6	1
Professional, Scientific, Management Services	11,064	12,268	11	10	-1
Public Administration	0	0	0	0	0
Retail Trade	11,732	8,836	12	7	-5
Transportation and Warehousing	2,501	1,022	3	1	-2
Wholesale Trade	4,681	5,855	5	5	0
Total	98,066	122,093	--	--	--

Table 40 - Business Activity

Data Source: 2007-2011 ACS (Workers), 2011 Longitudinal Employer-Household Dynamics (Jobs)

Labor Force

Total Population in the Civilian Labor Force	154,807
Civilian Employed Population 16 years and over	140,034
Unemployment Rate	9.54
Unemployment Rate for Ages 16-24	26.33
Unemployment Rate for Ages 25-65	6.37

Table 41 - Labor Force

Data Source: 2007-2011 ACS

Occupations by Sector	Number of People
Management, business and financial	36,266
Farming, fisheries and forestry occupations	6,607
Service	15,311
Sales and office	33,113
Construction, extraction, maintenance and repair	7,190
Production, transportation and material moving	6,484

Table 42 – Occupations by Sector

Data Source: 2007-2011 ACS

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	96,306	74%
30-59 Minutes	29,449	22%
60 or More Minutes	5,136	4%
Total	130,891	100%

Table 43 - Travel Time

Data Source: 2007-2011 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	8,526	1,861	7,915
High school graduate (includes equivalency)	21,266	2,699	8,118
Some college or Associate's degree	30,685	2,922	5,973

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Bachelor's degree or higher	50,013	1,945	5,930

Table 44 - Educational Attainment by Employment Status

Data Source: 2007-2011 ACS

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	937	2,887	2,947	4,291	3,202
9th to 12th grade, no diploma	5,168	2,804	2,490	2,883	2,382
High school graduate, GED, or alternative	9,750	9,379	7,224	15,480	8,524
Some college, no degree	16,239	10,241	6,366	12,397	4,104
Associate's degree	1,126	3,606	2,726	4,257	753
Bachelor's degree	5,560	13,908	8,255	12,566	3,436
Graduate or professional degree	335	5,365	6,119	11,709	3,117

Table 45 - Educational Attainment by Age

Data Source: 2007-2011 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	17,795
High school graduate (includes equivalency)	27,056
Some college or Associate's degree	32,216
Bachelor's degree	42,523
Graduate or professional degree	60,165

Table 46 – Median Earnings in the Past 12 Months

Data Source: 2007-2011 ACS

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

The major employment sectors are: Education and Health Care Services employ 25,067 employees; Arts, Entertainment, Accommodations employs 13,090 employees; Professional, Scientific, Management employ 11,604 employees; Retail Trade employ 11,732; Manufacturing employ 10,141 employees and Finance, Insurance and Real Estate employ 9,882 employees.

Describe the workforce and infrastructure needs of the business community:

The City is working with Ramsey County's workforce to help the underprepared to fill future job positions. There is a large gap in the changing economy to improve workforce development to match job skills with ever increasing job requirements.

Workforce specific skills are needed for the High Tech economy. Also, traditional workforce skills needs are changing due to technology growth in the use of computers and robotics. Employees with these skills are in high demand. Recent studies have indicated that these requirements on jobs will continue to increase and require a more higher skilled workforce. Therefore, a higher educated workforce is vital for the new economy.

Infrastructure needs of businesses also continue to grow more complex. 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. The need for upgraded roads and utilities will be needed in an aging infrastructure along with the technology that will allow businesses to compete and prosper.

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.

A major area of workforce development is preparing applicants for the increased needs of employers as the economy becomes more technical in job requirements. There is a gap and need for a more educated work force to meet the demand of the future business community.

The region is expected to experience large growth in professional sector jobs that will require a more highly educated workforce. A continued effort with Ramsey County is needed to meet this regional economic growth. The city has also seen a \$1 billion dollar investment in the Green Line light rail project that links downtown St. Paul with downtown Minneapolis. Additional effort to capture economic growth related to this investment will be continued. In addition, a new industry of urban farming is growing in the city. To date there are five urban farms operating or in the planning stages. A need for urban farmers to work in this new sector will be needed and local residents are well positioned to be placed in these positions. The City will continue to implement its Small Area Plans, Central Corridor Development Plan and Phalen Corridor Development Plan.

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 the city. The city has many colleges and universities located within its boundaries. This includes the University of Minnesota and national ranked St. Paul College for two year degree programs. Continued linkage for our educational institution to

provide an educated workforce is a strength of our region. The county has pointed out that there is a troubling gap between the educational qualifications of people of color and job requirements. This can result in a much less likelihood to secure employment opportunities. There is a general need to increase people with Bachelor's degrees and two year degrees.

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 in the region. The city will continue to work with the county as its partner. These include their Workforce Investment Board, Workforce Solutions with its many programs.

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

Yes

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.

Our business goals of tax base enhancement, job creation and provided needed goods and services to the surrounding neighborhoods along with livability improvements are all coordinated with the Consolidated Plan. The City also supports Metro MSP a regional economic development effort that brings the regional planning focus on development. This effort assumes economic development in the region supports all the communities in the region. Parts of this effort are coordinated with the Consolidated Plan.

Discussion

The City and its subgrantees have used CDBG funding to assist eight to twelve economic development activities per year over the last five years, and it is anticipated that they will continue to do so over the next five years. CDBG funding for economic development is used for the rehabilitation and/or development of commercial properties or for direct financial assistance to businesses. The activities help to retain and attract businesses to the City. They also help to 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. The City will work on the renovation and redevelopment of vacant and traditional commercial and industrial buildings. Green industries are also promoted in the City's development projects. The City will also promote energy-efficient retrofits, light manufacturing, startup businesses, sustainable urban farming, medical devices (or life science industries), financial services, distribution services/centers and other high-tech companies. All of these may create living

wage jobs or retain jobs. The City will also provide technical assistance to small and emerging businesses in our communities.

MA-50 Needs and Market Analysis Discussion

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

There are areas in Saint Paul where households with multiple housing problems are concentrated. These geographic areas are identified based on concentrations of potential or current, physical property issues (depressed property values, high number of houses on the market, higher than average proportions of vacant buildings); households under stress (many water shutoffs and high number of foreclosures); social problems (higher than average numbers of revoked certificates of occupancy and/or increasing incidences of narcotics, weapons violations, and arson). Concentration is defined as higher than average, based on Census tract geographies.

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

The City defines an area of minority group concentration as a census tract that has 88% or more people of color, a threshold that is equivalent to two times the City's overall minority population, according to the 2007-2011 American Community Survey. Recent immigrants from countries from around the world over the last decade coupled with historic settlement patterns has contributed to the concentration of racial and ethnic communities. Furthermore, the desire or necessity of living in areas with lower housing costs has also contributed to the concentration. One census tract, 33600, meets the City's definition of concentration, which is located in the City's Rondo neighborhood.

The City defines an area of low-income concentration as a census tract that has a poverty rate above 34%, which is twice the City's overall family poverty rate of 17%, according to the 2007 - 2011 American Community Survey. Analyzing the overall poverty rate by census tract identifies nine census tracts meet the City's definition of low-income concentration. These areas are typically found north of Interstate 94 in the Rondo neighborhood, along the northern segment of Interstate 35E in the North End and Dayton's Bluff neighborhoods, and dispersed within the Payne-Phalen and East Side neighborhoods.

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

Generally, the areas that have a concentration of minority households and poverty were highly impacted by the recession and housing crisis of the mid-2000s. These are areas of older homes that often suffer from deferred maintenance, absentee owners, and areas of disinvestment, and nearly all fell within the target areas for the use of HUD Neighborhood Stabilization Funds. However, within these areas pockets of reinvestment are beginning to take hold, particularly in the areas adjacent to the Green Line, Metropolitan State University, and revitalizing commercial corridors, which is described in more detail below.

Are there any community assets in these areas/neighborhoods?

The major community asset for the Rondo neighborhood is the Green Line, which is the City's first light rail line that connects downtown Saint Paul to downtown Minneapolis. The City has funded several affordable housing projects within this corridor and other private investment is beginning to take root. In addition, the City's near east side is beginning to revitalize through expansion of its key institutional anchor--Metropolitan State University--and addition of a new food store, and approved affordable senior housing project. The City recently completed a Master Plan for the West Side Flats area, which is across the river from the City's downtown in the West Side neighborhood, sets a framework for reinvestment in this area that includes sites for new housing and job opportunities.

Are there other strategic opportunities in any of these areas?

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. Outside of the associated neighborhoods around the Green Line, the City's Dayton Bluff neighborhood has expected and planned transit investments taking shape. Metro Transit will be extending its high frequency 54 bus route into this area along East Seventh Street. This will provide a new express bus service connecting this area to downtown Saint Paul, which serves as a transit hub to intercity routes, to the metropolitan airport, and the Mall of America, which is a job center and intercity transit hub. In addition, another major transit route is in the planning stages for this area—the Gateway Corridor. This is expected to be a bus rapid transit facility that connects the suburban communities east of the City through this area and to downtown Saint Paul. Conceptual station area planning for this route is currently underway in this area.

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. The process of prioritizing these improvements and allocating scarce resources is a difficult task. The City utilizes plans, policies, resident and organizational input to help make these decisions. This section of the Consolidated Plan Discusses how the priorities identified in the plan were determined and what types of households and populations the City intends to serve with these priorities. The priorities reflect the needs of the entire City, and are based on the assumption that all funding sources, including HUD funding, will not change significantly over the next five years.

The obstacles to meeting housing and community development needs in Saint Paul are varied, and contribute to the lack of affordable housing opportunities and the community's inability to meet the needs of its residents. Some of the obstacles are as follows:

- Insufficient funding for housing activities from all levels of government;
- Aging housing stock;
- Remaining impact to the community and neighborhoods from the foreclosure crisis;
- Scarce availability and high cost of land for development and redevelopment;
- High housing construction and operating costs; and
- High infrastructure maintenance costs and limited local budgets.

Despite the millions of dollars of continued public and private investment, the housing needs in Saint Paul continue to grow. The need for safe, decent, and affordable housing exists throughout the City. The majority of the City's housing efforts are based on a variety of market and public sector factors, including the availability of financing sources, the condition and vacancy patterns of the existing housing stock, and the partnerships between other public and private entities.

City priorities identified in this section, were determined through the examination of various demographic data, a review of adopted City plans and policies, agency and stakeholder input received during the development of the Consolidated Plan, and finally a review and approval by the City Council.

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

Geographic Area

Table 47 - Geographic Priority Areas

1	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, with the highest-need areas being identified on the attached map image.

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

Priority Needs

Table 48 – Priority Needs Summary

1	Priority Need Name	Preservation of Affordable Rental Housing
	Priority Level	High
	Population	Extremely Low Low Moderate Middle
	Geographic Areas Affected	Other
	Associated Goals	Housing Rehabilitation
	Description	Work with public- and private-sector affordable housing providers to preserve existing contractually obligated affordable housing that is set to expire between 2015 and 2019.
	Basis for Relative Priority	Conservatively the contractual obligations for 1,672 rent subsidized and contractually obligated affordable housing units may expire or be up for renewal between 2015 to 2019. It is one of the City's top housing priorities to preserve affordability in existing units.
	2	Priority Need Name
Priority Level		High
Population		Extremely Low Low Large Families Families with Children Elderly Public Housing Residents
Geographic Areas Affected		Other

	Associated Goals	Development of New Housing
	Description	Facilitating the development of new affordable rental housing units for households between 0-50% of AMI.
	Basis for Relative Priority	<p align="left">Extremely low and low-income Renters are severely cost burdened with 42% of all of these households paying more than 50% of their income for housing at (both small and large households) are the most likely to experience severe cost burdens, spending half or more of their income on rent. There is an insufficient amount of subsidized rental units to meet the demand, as indicated by the Saint Paul Public Housing Authority's waiting lists for public housing and housing vouchers.</p>
3	Priority Need Name	Housing rehabilitation assistance
	Priority Level	High
	Population	Low Moderate Large Families Families with Children Elderly
	Geographic Areas Affected	Other
	Associated Goals	Housing Rehabilitation
	Description	Housing rehabilitation assistance for low-moderate income homeowners, including ways to increase home energy efficiency.
	Basis for Relative Priority	
4	Priority Need Name	Non-housing community development
	Priority Level	High

	Population	Extremely Low Low Moderate Families with Children Public Housing Residents Chronic Homelessness Individuals veterans Unaccompanied Youth Non-housing Community Development
	Geographic Areas Affected	Other
	Associated Goals	Public Improvements Public Services Economic Development
	Description	<ul style="list-style-type: none"> • Economic development, including job training and small business development. • Community development, including but not limited to youth services, and assistance to households in managing finances • Renter education, credit repair assistance, and criminal record expungement
	Basis for Relative Priority	
5	Priority Need Name	Fair Housing and housing discrimination.
	Priority Level	High

	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Chronic Homelessness Individuals Families with Children 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
	Geographic Areas Affected	Other
	Associated Goals	Public Services

	Description	<p>Housing discrimination can be a significant barrier for individuals and families seeking affordable housing. While discrimination is often difficult to detect, discrimination against persons on the basis of race/ethnicity, familial status, language, gender, age, disability and receipt of public assistance can prevent access to safe and decent housing.</p> <p>In response, the City’s Human Rights and Equal Economic Opportunity (HREEO) Department assists residents who have housing discrimination claims. Second, the City is a jurisdiction member and funder of the Fair Housing Implementation Council. Third, the City supports the Housing Equality Law Project of the Southern Minnesota Regional Legal Services. Fourth, the City has signed on to a national effort to increase equity in housing, hiring and other avenues. In the future, the City remains committed to promoting Fair Housing efforts.</p>
	Basis for Relative Priority	
6	Priority Need Name	Supportive services to help keep households housed
	Priority Level	High
	Population	Low Moderate Large Families Families with Children Elderly
	Geographic Areas Affected	Other
	Associated Goals	Public Services
	Description	Provide services such as low- and no-interest rehabilitation loans; credit counseling; mortgage foreclosure prevention etc...
	Basis for Relative Priority	
7	Priority Need Name	Tenant and landlord education

	Priority Level	High
	Population	Extremely Low Low Moderate Middle Large Families Families with Children
	Geographic Areas Affected	Other
	Associated Goals	Public Services
	Description	Educate landlords and tenants on issues related to maintenance of rental housing units, and represent tenants, particularly those who are members of, or serving, new American communities.
	Basis for Relative Priority	
8	Priority Need Name	Increase homeownership opportunities
	Priority Level	High
	Population	Moderate Middle Families with Children
	Geographic Areas Affected	Other
	Associated Goals	Development of New Housing
	Description	Provide access to low-interest loans and down-payment assistance for new/prospective homeowners
	Basis for Relative Priority	
9	Priority Need Name	Homeless prevention strategies

	Priority Level	High
	Population	Extremely Low Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Victims of Domestic Violence Unaccompanied Youth
	Geographic Areas Affected	Other
	Associated Goals	Homeless Prevention
	Description	Fund operations of existing emergency shelters, transitional housing, and supportive services.
	Basis for Relative Priority	
10	Priority Need Name	Assessing individual homeless persons' needs
	Priority Level	High
	Population	Extremely Low Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Victims of Domestic Violence Unaccompanied Youth
	Geographic Areas Affected	Other
	Associated Goals	Homeless Prevention

	Description	Continue to work with nonprofit organizations and service providers to provide community outreach, drop-in centers, meals and direct services to the homeless population through such tools as the City of Saint Paul's Civic Organization Partnership Program (COPP)
	Basis for Relative Priority	
11	Priority Need Name	Emergency shelters and transitional housing
	Priority Level	High
	Population	Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Victims of Domestic Violence Unaccompanied Youth
	Geographic Areas Affected	Other
	Associated Goals	Homeless Prevention
	Description	Continue working on the Continuum of Care program, a comprehensive approach to ending homelessness
	Basis for Relative Priority	
12	Priority Need Name	Transitions to permanent housing
	Priority Level	High

	Population	Extremely Low Large Families Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Victims of Domestic Violence Unaccompanied Youth
	Geographic Areas Affected	Other
	Associated Goals	Homeless Prevention
	Description	Helping homeless persons make the transition to permanent housing and independent living.
	Basis for Relative Priority	
13	Priority Need Name	Public facilities
	Priority Level	High
	Population	Non-housing Community Development
	Geographic Areas Affected	Other
	Associated Goals	Public Improvements

	Description	The City has over 30 recreational facilities (which include senior centers, youth centers, and neighborhood facilities), 4000 acres of parkland, more than 80 tot lots, a zoo, 4 golf courses, and 13 library facilities located throughout the City, as well as a number of parking facilities which are primarily located in the downtown area. There are also over 300,000 trees on City property. All of this property requires periodic improvement, expansion or replacement. City bond funds are used to finance the many of these activities, but CDBG funding is also used to finance 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, most likely for parks and recreational facilities. The City also anticipates that it will continue to use HUD funding (primarily ESG) for homeless facilities.
	Basis for Relative Priority	
14	Priority Need Name	Infrastructure
	Priority Level	Low
	Population	Non-housing Community Development
	Geographic Areas Affected	Other
	Associated Goals	Public Improvements
	Description	The City has nearly \$3 billion worth of infrastructure (850 miles of streets, 1,100 miles of sidewalks, 1,250 miles of sewers, 331 bridges, and 32,000 street lights) that it maintains and operates. The repair and replacement of this infrastructure is very important to the City, and these types of improvements are predominantly financed with a number of 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.
	Basis for Relative Priority	Although infrastructure was rated high by survey respondents and community input, the City of Saint Paul has other funding for infrastructure projects.

15	Priority Need Name	Public service needs
	Priority Level	High
	Population	Non-housing Community Development
	Geographic Areas Affected	Other
	Associated Goals	Public Improvements Public Services Community Engagement Youth Employment
	Description	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 more need for these types of activities in the City than the County is able to provide, City funding is also used (including up to the maximum allowed 15 percent of CDBG funds) to provide additional public services for the 275,000+ 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. The City is also seeing a need for service-enriched housing, as well as a need for increased job training which would help people have the potential to earn a livable wage.
	Basis for Relative Priority	
16	Priority Need Name	Economic development needs
	Priority Level	High
	Population	Non-housing Community Development
	Geographic Areas Affected	Other
	Associated Goals	Youth Employment Economic Development

	Description	The City and its subgrantees have used CDBG funding for eight to ten economic development activities per year over the last five years, and it is anticipated that they will continue to do so over the next five years. CDBG funding is primarily used for the rehabilitation or development of commercial properties, or for direct financial assistance to businesses. These activities help the City retain and attract businesses, and also help to create jobs for City residents. Businesses that receive CDBG funding must either have a low/moderate income service area, or create jobs for low/moderate income persons. The City will work on the renovation and/or redevelopment of vacant, historic, and/or traditional commercial and industrial buildings. The City and its partners will also promote green industries, energy efficiency building retrofits, light manufacturing, start-up businesses, sustainable farming, medical devices (or life science industries more generally), financial services, distribution services/centers and other high-tech businesses. All of these can create living wage jobs, or retain such jobs. The City will also provide technical assistance to small and emerging businesses.
	Basis for Relative Priority	
17	Priority Need Name	Planning needs
	Priority Level	High
	Population	Non-housing Community Development
	Geographic Areas Affected	Other
	Associated Goals	
	Description	Over the next five years the City plans to use CDBG and local funding to pay for planning needs in Saint Paul, which will help the City determine where to target its investments. Planning activities include updating sections of the Comprehensive Plan, completing small area plans, administering zoning and land use regulations, and completing historic and environmental reviews. The City will use CDBG funding for planning activities carried out in low/moderate income areas of the City, and also to complete HUD required environmental and historical reviews.

	Basis for Relative Priority	
18	Priority Need Name	Lead based paint
	Priority Level	High
	Population	Families with Children
	Geographic Areas Affected	Other
	Associated Goals	Housing Rehabilitation
	Description	Implementation of the action plan which developed program procedures to address the HUD regulations on lead-based paint hazards in federally-owned housing and housing receiving federal assistance.
	Basis for Relative Priority	
19	Priority Need Name	Acquisition, demolition, clearance of property
	Priority Level	High
	Population	Non-housing Community Development
	Geographic Areas Affected	Other
	Associated Goals	Remediation of Substandard Properties
	Description	Funding to purchase and/or demolish and/or dispose of and/or clear properties for neighborhood redevelopment and revitalization
	Basis for Relative Priority	
20	Priority Need Name	Code enforcement
	Priority Level	Low

	Population	Non-housing Community Development
	Geographic Areas Affected	Other
	Associated Goals	Remediation of Substandard Properties
	Description	Assistance to improve existing conditions of residential and non-residential buildings
	Basis for Relative Priority	
21	Priority Need Name	Community outreach
	Priority Level	High
	Population	Non-housing Community Development
	Geographic Areas Affected	Other
	Associated Goals	Public Services Community Engagement
	Description	Funding for outreach to underserved populations
	Basis for Relative Priority	

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 Authority 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 Authority 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 rental housing affordable to extremely low, very low, and low income households. As discussed, there are approximately 35,825 rental households at 0 - 80% of AMI and only 45,705 units that are affordable to households within that income range. Those households living at 0 - 30% of AMI most impacted by severe cost burden due to the fact that there are approximately 20,000 rental households in that income range and approximately 7,500 rental units that are affordable to those households.
Rehabilitation	Ninety percent of the owner-occupied housing and nearly eighty percent of the renter-occupied housing was constructed before 1980. Nearly two-thirds of the owner-occupied and two-fifths of the renter-occupied units are at least 65 years old. 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 is critical to facilitate redevelopment and revitalization efforts.

Table 49 – Influence of Market Conditions

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

Introduction

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	6,384,098	365,902	0	6,750,000	25,650,000	Expected amount available for the remainder of consolidated plan reflects a 5% cut for 2016 and assumes steady funding for the remaining 3 years.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	1,427,984	0	0	1,427,984	5,600,000	Expected amount available for remainder of consolidated plan assumes a small decrease for 2016 and assumes steady funding for the remaining 3 years.
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	579,908	0	0	579,908	2,320,000	Expected amount available for remainder of consolidated plan assumes a small increase for 2016 and steady funding for the remaining 3 years.

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 match no less than 25 cents for each dollar of HOME funds spent on affordable housing. The City of Saint Paul receives a match reduction of 50%. The City currently has excess match carried over from previous fiscal years in the amount of \$4,370,684.41. The City of Saint Paul has enough excess match to meet the HOME match requirements for the next 5 years. The City anticipates it will continue to leverage other private and public funds in the development of HOME funded affordable housing and accumulate additional match.

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

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

Discussion

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 Human Services	Government	Homelessness Non-homeless special needs	Jurisdiction

Table 51 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

STRENGTHS IN DELIVERY SYSTEM: The strength of the City/County’s comprehensive homelessness prevention services is the collaborative working partnerships among the City of Saint Paul, Ramsey County, and community agencies—working together to respectfully assist individuals, families, youth, veterans, and new Americans facing homelessness.

Ramsey County Continuum of Care. The City and Ramsey County Continuum of Care (COC) collaboratively use community-wide gaps analysis in order to develop service protocols that are responsive to the needs of individuals, families, youth, and underserved populations such as residents with limited English proficiency (such as Hmong refugees from Laos and Spanish-speaking residents) and veterans. The City/County allocate federal and state funds to provide street outreach, homelessness prevention, and rapid rehousing services to adults, families, youth, and underserved populations facing homelessness.

Responsive to needs/Assignment of Duties: As the major funder of social services, Ramsey County allocates federal and state funds to community agencies that serve homeless residents 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. The City and State allocate various funds, including CDBG, HOME, Low Income Housing Tax Credits, State funds, and City funds to finance affordable housing opportunities for Saint Paul residents.

The City of Saint Paul, Ramsey County, and State of Minnesota respond to changing needs. In face of overwhelming need, the City, County, Catholic Charities, Union Gospel Mission, and foundations worked collaboratively to provide additional beds at the family shelter, additional beds for cold-weather shelters for individuals, additional shelter beds for homeless youth, and supportive housing for veterans returning from Iraq and Afghanistan. The City, State, and Catholic Charities are currently developing a new adult emergency shelter.

Active participation. The City, County, and 18+ community agencies collaboratively establish policies and procedures to ensure that a comprehensive services are provided to Saint Paul residents facing

homelessness. Moreover, Ramsey County COC's strong governing board has active members who are willing to develop new collaborative approaches.

GAPS IN THE DELIVERY SYSTEM: The City, Ramsey County COC, and community agencies work together to provide comprehensive services to assist homeless residents in an manner that is cost-effective yet respectful to Saint Paul residents. That said, the major gap in service delivery is the lack of sufficient funds to pay for the necessary services. Another major impediment is the lack of federal funds to pay for federal unfunded mandates/requirements. For example, HUD requires coordinated assessment to be conducted for persons seeking emergency shelter. In Ramsey County, coordinated assessment for homeless families cost approximately \$300,000 annually which must be paid with local funding. This mandate requires that Ramsey County has less funds for other homeless prevention services. In the future, HUD is requiring coordinated assessment services for families, adults, and youth. Coordinated Access provides benefits to homeless residents, however, this unfunded federal mandate has a financial impact on local services.

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
Homelessness Prevention Services			
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	
Other Street Outreach Services		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
Life Skills		X	
Mental Health Counseling		X	
Transportation		X	

Other			
		X	

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)

City's Homelessness Initiatives/Emergency Solutions Grant (ESG) funds street outreach (homeless vets), emergency shelters(Dorothy Day Center/adults, Ain Dah Yung Teen Shelter/SafeZone/SafeHouse-for youth, Family Service Center/Project HOME/Family Place - for youth) transitional housing (Emma Norton/Theresa Living Center/YWCA Transitional Housing Program-women and families), and other community services (Project HOPE, Listening House, and HouseCalls). Overall, ESG assists 5,000 shelter and unsheltered homeless individuals annually. The City also owns Saint Paul Residence (120 units of support housing with 60 units for chronically-inebriated residents). The City, State, and Catholic Charities is also building a new Dorothy Day Center (273 shelter beds/193 SRO). The City has responsive programs, such as when the Saint Paul Police, Listening House, and South Metro Human Services developed police services/outreach services/mental health services responsive to homeless residents with mental illness. In response to the Police/Homeless Community Forums, the City and County financed an overflow emergency shelter; developed a rapid rehousing program and street outreach to homeless residents who use the Downtown Saint Paul Central Library during the day, and provided rapid rehousing services to shelter residents who are “medically-compromised” to coordinate rapid rehousing services with appropriate health care services. Finally, CDBG funds the Block Nurse and Neighborhood Non-Profit programs which assists homeless persons and persons with special needs. The Health Care for the Homeless (HCH) clinics serve approximately 3500 unduplicated homeless residents annually at eight shelter and drop-in centers in Saint Paul.

Ramsey County Continuum of Care (COC) works with the City to create a comprehensive homelessness prevention program responsive to needs of individuals, families, youth, and underserved populations, such as residents with limited English proficiency and homeless veterans. The City partners with Ramsey County COC by leveraging ESG funds with state homelessness prevention funds. Overall, the City participates with the 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.[1] The City and County COC also participate with State's Veterans Homelessness Advisory Committee to develop housing initiatives for homeless veterans. The City and Ramsey County COC support the participation of homeless residents on committees for Ramsey County COC and FHAP.

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

Comprehensive Services: The City, Ramsey County Community Human Services (CHS), Ramsey County Continuum of Care (COC) and Saint Paul Public Housing Agency (PHA) provide support services responsive to the needs of special populations and 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 rehousing 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 brain injury, and persons with physical challenges.

Responsive to needs/Assignment of Duties/Active Participation: As the major funder of social services, Ramsey County allocates federal and state funds to community agencies that serve homeless residents 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 homeless residents and residents with special needs. In the past, in face of overwhelming need, the City, County, Catholic Charities, Union Gospel Mission, and foundations worked collaboratively to provide additional beds at the family shelter, additional beds for cold-weather shelters for individuals, additional shelter beds for homeless youth, and supportive housing for veterans returning from Iraq and Afghanistan. The City, State, and Catholic Charities are developing a new adult emergency shelter (Phase 1) and the City, State, County, and Catholic Charities will be working together for Dorothy Day Phase 2 - with a new Opportunity Center with support services and additional supportive housing.

GAPS IN THE DELIVERY SYSTEM: The City, Ramsey County COC, Ramsey County CHS, and community agencies work together to provide comprehensive services to assist homeless residents and residents with special needs. That said, the major gap in service delivery is the lack of sufficient funds to pay for the necessary 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

Strategy to overcome Gap - Need for more emergency shelter beds/need for permanent supportive housing for youth. The City, State of Minnesota, and Catholic Charities are developing a new emergency shelter (278 beds and 193 SRO units) to address the immediate need for more emergency shelter beds for single adults (construction to begin in Fall 2015). At the same time, the City, and County are funding emergency shelter beds for single adults to be available during the cold-weather months of 2015. The City, State, and Beacon Interfaith are developing new supportive housing for unaccompanied youth (construction to occur during 2015/2016).

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	2015	2019	Homeless	Citywide	Homeless prevention strategies Assessing individual homeless persons' needs Emergency shelters and transitional housing Transitions to permanent housing	ESG: \$2,754,912	Homelessness Prevention: 15000 Persons Assisted
2	Development of New Housing	2015	2019	Affordable Housing	Citywide	Affordable Rental Housing Increase homeownership opportunities	CDBG: \$3,225,000 HOME: \$3,162,593	Rental units constructed: 855 Household Housing Unit Homeowner Housing Added: 95 Household Housing Unit
3	Housing Rehabilitation	2015	2019	Affordable Housing	Citywide	Preservation of Affordable Rental Housing Housing rehabilitation assistance Lead based paint	CDBG: \$9,483,000 HOME: \$3,162,593	Rental units rehabilitated: 300 Household Housing Unit Homeowner Housing Rehabilitated: 450 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Public Improvements	2015	2019	Public facilities	Citywide	Non-housing community development Public facilities Infrastructure Public service needs	CDBG: \$400,000	Other: 3 Other
5	Public Services	2015	2019	Non-Housing Community Development	Citywide	Non-housing community development Fair Housing and housing discrimination. Supportive services to help keep households housed Tenant and landlord education Public service needs Community outreach	CDBG: \$1,452,000	Public service activities other than Low/Moderate Income Housing Benefit: 25000 Persons Assisted
6	Community Engagement	2015	2019	Non-Housing Community Development Crime prevention	Citywide	Public service needs Community outreach	CDBG: \$2,280,000	Public service activities other than Low/Moderate Income Housing Benefit: 121839 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
7	Youth Employment	2015	2019	Non-Housing Community Development Employment	Citywide	Public service needs Economic development needs	CDBG: \$2,221,000	Public service activities other than Low/Moderate Income Housing Benefit: 2000 Persons Assisted
8	Economic Development	2015	2019	Non-Housing Community Development	Citywide	Non-housing community development Economic development needs	CDBG: \$2,550,000	Facade treatment/business building rehabilitation: 15 Business Businesses assisted: 15 Businesses Assisted
9	Remediation of Substandard Properties	2015	2019	Non-Housing Community Development	Citywide	Acquisition, demolition, clearance of property Code enforcement	CDBG: \$4,309,000	Buildings Demolished: 100 Buildings

Table 53 – Goals Summary

Goal Descriptions

1	Goal Name	Homeless Prevention
	Goal Description	Address the need for availability of decent housing by assisting providers of homeless shelters.
2	Goal Name	Development of New Housing
	Goal Description	Address the need for affordability of decent housing by providing assistance for new housing.

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

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)

The City of Saint Paul preliminarily estimates providing Consolidated Plan housing resources to meet the unit goals for the following income groups in the period of 2015-19:

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)

Saint Paul PHA carries out its 5 year and Annual Plan in conformity with Section 504 of the Rehabilitation Act of 1973 and Title II of American Disabilities Act.

To further meet Section 504 requirements, Saint Paul PHA allocates a portion of its HUD funding provided under the Capital Fund Program to modify its housing stock by making reasonable accommodations, such as installing grab bars in bathrooms, installing ramps, widening doors, and modifying kitchen cabinets and counters, as appropriate. At Roosevelt Homes, PHA constructed a new single-story two bedroom accessible unit. In 2015, Saint Paul PHA will also be constructing another accessible-designed townhouse at McDonough Homes. PHA also maintained 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

Saint Paul PHA has programs and activities to increase Resident Involvement, such as:

- 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.
- With its new Resident Initiative Department, Saint Paul PHA works with its Resident Councils to form new partnerships with private and community agencies – to help residents improve their health and well-being.
- St Paul PHA community centers provide links to community services that focus on program and services that enrich residents' lives, promote independence, and increase community involvement and support successful tenancies in Saint Paul PHA homes.
- Annually, a Saint Paul PHA family development hosts the annual National Night Out – bringing PHA residents together with local service agencies, police/ fire personnel , and PHA volunteers – to raise community awareness, forge new partnerships, and strengthen existing relationships, such as, but not limited to, St. Paul Boys and Girls Club, PHA Resident Councils, PHA Resident and Self-Sufficiency (ROSS) Program, St. Paul Police Department and its A Community Outreach Program (community policing program), St. Paul Fire Department, Merrick Community Center, and Hmong American Partnership.
- In 2013, PHA was selected for the second year in a row to partner with Free Bikes 4Kids, a nonprofit organization that provides bikes to low-income youth.

- In 2013, five PHA residents were awarded \$1000 scholarships through the Saint Paul PHA's George and Nancy Latimer Public Housing Resident Program. Scholarships help pay tuition for public housing and Section 8 participants who are pursuing post-secondary education.
- To promote economic opportunities, Saint Paul PHA will participate, to the greatest extent possible, with the Section 3 program – by hiring qualified PHA residents and qualified Section 3 businesses.

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

No

Plan to remove the 'troubled' designation

Saint Paul Public Housing Agency (St. Paul PHA) owns and manages 4,259 HUD-subsidized public housing rental units which are well-maintained and fully occupied (consistently over 99%) - providing safe, affordable housing to about 10,000 low income residents.

In 2014, Saint Paul PHA received HUD's "High Performer" rating for the 24th consecutive year under the "Public Housing Management Assessment Program" and the "Public Housing Assessment Program" (PHAS). 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. [1]

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

Barriers to Affordable Housing

The City has approximately 16,460 households (36 percent of all City renters) who currently receive some housing assistance, including 12,228 publicly-assisted housing units and 4,589 Section 8 vouchers.[1] Yet, the biggest barrier to securing affordable housing is that many households lack sufficient incomes to pay the rents of modestly-priced apartments[2] and the lack of affordable housing opportunities.

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

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

In response, the City's Affordable Housing Policy requires that city-financed rental projects have 10% of the units affordable at 30% AMI and 10% of the units affordable at 50% AMI. Furthermore, the City's Locational Choice Policy and the City's Low Income Housing Tax Credit Selection Process encourage "a more equitable distribution of affordable housing" citywide. Even with seemingly insurmountable barriers, the City has partially financed the preservation, renovation, or new construction of 275 affordable rental housing units— using combined financing, such as low-income housing tax credits, federal funds, such as CDBG, NSP, HOME, TIF, and City's STAR funds.

Still, the City needs federal and state support to finance affordable housing developments. Therefore, the lack of sufficient federal funding and sufficient allocation of low income housing tax credits – as public policies – has negative effects on affordable and residential investments. In 1975, the City received CDBG funding of \$18,835,000. Forty years later, the City may receive CDBG funding of \$6,384,098. Similarly, the City received HOME funds of \$2,316,000 in 2000; the City may receive \$1,427,984 in 2015. At the same time, the State of Minnesota may reallocate a portion of the City's Low Income Housing Tax Credits. In the face of increasing need, the City has less federal funds and may have less low income housing tax credits to finance affordable housing and residential investment

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

In this section, the City will identify strategies to overcome barriers to affordable housing as follows:

Lack of Sufficient Funding for Public-Assisted Housing. A major barrier to developing publicly-assisted affordable housing in Saint Paul is the lack of sufficient federal funding for CDBG and HOME Programs -

which the City uses to finance housing affordable to households at 30% of area median income. Similarly, as a HUD Higher Performer, Saint Paul Public Housing Agency has, in past years, operated with reduced federal funding for its housing programs.

At the state level, Minnesota Housing Finance Agency is a strong supporter of affordable housing. However, in 2016, the State of Minnesota may reduce its allocation of Low Income Housing Tax Credits for affordable housing in the City of Saint Paul.

In the face of these seemingly insurmountable barriers, the City will partially finance the preservation, renovation, or new construction of affordable rental housing units citywide— using combined financing, such as low-income housing tax credits, federal funds, such as CDBG, NSP, HOME, TIF, and City’s STAR funds. However, it should be noted that City of Saint Paul can finance publicly-assisted affordable housing only to the extent that the City has adequate funding.

Service fees. With federal and state budget constraints, the City must rely upon service fees to pay operational costs - especially when local municipalities must comply with unfunded federal and state mandates. In response, City of Saint Paul has worked to develop reasonable fees that are commensurate with municipal costs.

Lack of land. As a fully-built City, Saint Paul has less available land to build affordable housing, such as single family Habitat for Humanity homes or larger housing developments. Additionally, the City has almost no available land in higher income neighborhoods, which further limits the City’s ability to promote affordable housing across the city. Consequently, land assembly and land clearance costs pose additional costs for affordable housing. In response, the City will continue to finance affordable housing citywide as financially feasible.

Changes in the housing market. The City faces constant pressures to promote citywide development while trying to preserve affordable housing. However, as neighborhoods improve, such as Downtown Saint Paul and potentially along the Central Corridor line, building owners often consider terminating government housing programs when possible. In the past, the City made great efforts to preserve federally-subsidized housing, such as Skyline Towers, while financing a new construction project, such as Hamline Station Family Housing, along Central Corridor. Therefore, in response to changing housing markets, the City will continue to finance affordable housing as financially feasible.

SP-60 Homelessness Strategy – 91.215(d)

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

Saint Paul nonprofit organizations and service providers provide community outreach, drop-in centers, meals, and other direct services to reach out to homeless residents and at-risk of being homeless residents. Many of these services are supported in part by City of Saint Paul's the City's Emergency Solutions Grant Program (ESG), City's Community Organization Partnership Program (COPP), Ramsey County Continuum of Care (COC), Ramsey County Family Homelessness Prevention Assistance Program (FHPAP), and United Way.

Ramsey County also provides counseling and case management on various sites, such as the Health Care for the Homeless, a collaborative project of the Ramsey County and neighborhood health centers, which offers basic health services to the homeless at the shelters and transitional facilities.

To assess homeless needs citywide, Ramsey County COC conducts the annual HUD Point-in-Time Count. As part of this survey, Ramsey County COC interview residents in emergency shelters as well as many unsheltered homeless residents who may live outside, under bridges, and in places not designated for human habitation.

Outreach services to homeless persons (especially unsheltered persons) with assessment of their needs are provided, but not limited to the following:

- **People Inc. – Metropolitan Homeless Street Outreach Program (MHSOP)** provides street outreach to unsheltered homeless adults^[1] who experience mental illness in Ramsey County. Outreach specialist search for unsheltered adults in outdoor camps and in day-drop-in centers where homeless congregate. MHSOP services include providing street outreach, basic survival gear, and assistance in stabilizing mental illness symptoms, benefit assistance, and housing placement. Outreach Specialist address housing needs and offer access to Ramsey County – Group Residential Housing to assist the participants to obtain and pay for housing
- **South Metro Human Services – Access Program** provides outreach and case management services to homeless adults with serious and persistent mental illness and substance abuse disorders in Ramsey County. The Access staff visit most homeless shelters and drop-in centers in Ramsey County each week.
- **Coordinated Access to Housing and Shelter (CAHS)** conducts assessments for homeless families seeking emergency shelter to determine the most appropriate housing referral.
- **Street Outreach to Homeless Veterans** will be provided by People Inc. as a program component of Minnesota Assistance Council for Veterans (MAC-V) Supportive Services for Veteran Families Program, funded by US Department of Veterans Affairs. The City's ESG program will partially fund these street outreach services to homeless veterans, which will occur in emergency shelters and places where homeless Veterans may congregate.

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

Streetworks – Lutheran Social Services may develop street outreach services to homeless youth during 2015.

Addressing the emergency and transitional housing needs of homeless persons

The City of Saint Paul proactively is addressing the problems of homelessness in numerous ways. Most important, the City has strengthened its relationships with Ramsey County and service providers to establish a coordinated system that serves homeless and "at-risk of being homeless" individuals, homeless families, and homeless youth. This section includes some, but not all, strategies to address the needs of homeless persons.

Ramsey County Continuum of Care (COC). Saint Paul works with Ramsey County COC to ensure that comprehensive homelessness prevention and rapid rehousing services can be provided to all homeless populations, including underserved communities, including New Americans (Karen, Hmong, and Cambodian), homeless young adults, and homeless veterans. The City is a participating member of the Ramsey County COC Governing Board and Ramsey County Family Homelessness Prevention Assistance Program (FHPAP). It should also be noted that ESG-funded agencies often secure additional community resources, including emergency funds for Saint Paul homeless residents or at-risk of being homeless residents from the Saint Paul Foundation's Community Sharing Fund

Emergency Solutions Grant (ESG). The City allocates its Emergency Solutions Grant funds to partially fund the operations of agencies that provide homeless prevention services, emergency shelters, and transitional housing to assist homeless individuals, homeless families, and homeless youth. Saint Paul allocates ESG funding for operating funds, street outreach, homelessness prevention, and rapid rehousing. The ESG funds are awarded on a competitive basis, with the proposals reviewed by the City staff and the Ramsey County Continuum of Care Coordinator for final approval by City Council.

Dorothy Day Center Emergency Shelter/ReVision Project. The Dorothy Day Center emergency shelter is currently working at full capacity. In response, the Mayor's Task Force on Homelessness, City staff, Catholic Charities, and State of Minnesota are working together to develop a new Dorothy Day Center. Phase 1 will include 278 shelter beds and 193 single room living units. City staff will also be working with Catholic Charities to develop Phase 2 with a new "Connection Center" and up to 170 additional housing units with a wide array of support services.

Cold Weather Overflow Emergency Shelter. Since the Dorothy Day Center is operating at full capacity, the City, Ramsey County, and Catholic Charities are working together to provide additional shelter beds for the cold-weather winter months of 2015. Additionally, Union Gospel Mission is providing additional beds for the cold-weather winter months.

Rapid Rehousing. The City allocates ESG funds for rapid rehousing services for homeless adults staying at the Dorothy Day Center Emergency Shelter as well as rapid rehousing services provided by SafeZone for homeless youth.

Transitional housing. The City will use ESG funds to partially pay for operating funds for transitional housing as well as award ESG funds to assist a transitional housing facility to provide rapid rehousing services. Additionally, transitional housing facilities in Saint Paul receive financial support from Ramsey County COC and FHPAP

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 participates with Ramsey County Continuum of Care (COC) to assist homeless adults, homeless families, and homeless youth by developing the following strategies:

- **Strategies to empower homeless adults:** The City's ESG funds the Dorothy Day Rapid Rehousing Program (case management and housing assistance) so shelter residents move into permanent supportive housing.
- **Strategies to empower homeless families:** The City finances affordable housing, including supportive housing – providing more opportunities for at-risk of homeless families. The City's ESG funds community agencies that provide housing and case management to homeless families, (Catholic Charities Family Service Center, YWCA transitional housing, and Theresa Living Center.) The City's ESG funds homelessness prevention initiatives, (East Side Family Center, Project HOPE, and HouseCalls) to assist at-risk homeless families.
- **Strategies to empower homeless youth:** The City and County recognize that the number of emergency shelter beds for homeless youth remain insufficient. In response, the Otto Bremer Foundation provided funding to increase shelter capacity for homeless youth.^[1] In 2014, the City Council approved STAR funding for the 180 Degrees project—a new 14-bed emergency shelter for homeless youth. The City's ESG funds emergency shelters for youth (Salvation Army, Lutheran Social Services, Ain Dah Yung,) and rapid rehousing (Face-to-Face Safe Zone – a youth drop-in center and a rapid rehousing program) – all programs for unaccompanied homeless

youth. The City is also providing HOME funds to construct Prior Crossing – an affordable housing project for homeless youth.

- **Strategies to empower homeless veterans:** Saint Paul’s efforts are focused on Mayor Coleman’s commitment to end Veteran homelessness by the end of 2015. These efforts include improved identification of Veterans, progress monitoring, and strategies to increase the rate of housing outcomes for veterans experiencing homelessness. Minnesota Assistance Council for Veterans (MACV) provides homeless or near-homeless veterans and their families with homelessness prevention and re-housing assistance - services include rental/mortgage assistance, security/damage deposits, utility assistance and, as appropriate, transportation assistance while the veteran is being stabilized. Additionally, MACV has supportive housing for six returning veterans, a supportive house for women veterans, and street outreach to veterans (partially ESG-funded)
- **Affordable Housing: CDBG/HOME/Low Income Housing Tax Credits.** Saint Paul allocates CDBG funds, HOME Funds, and Low Income Housing Tax Credits, as appropriate, to finance affordable housing, including developing supportive housing, such as Jamestown Homes (preservation of affordable housing), Prior Crossing (new construction for homeless youth), and Hamline Station Family Housing (new construction).

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 Community Human Services provide specific programs and counseling to previously-institutionalized or homeless individuals through partnerships with nonprofit service providers to assist in the transition to permanent housing. This relationship is the primary network that performs this function and includes assistance such as help with security deposit, child care, job training, transportation, mental health counseling, chemical dependency treatment, and job search assistance.

Supportive Housing. Since 2002, the City of Saint Paul has developed supportive housing facilities, such as Crestview, Visitation, and Jackson Street Village, Jeremiah Program, and St. Christopher’s Place, which serves at-risk individuals and families. The City also owns Saint Paul’s Residence which provides 60 units of permanent supportive housing for chronically-inebriated residents and 60 units of permanent supportive housing for at-risk homeless residents. In 2015, the City is providing HOME funds to Prior Crossing – 44 units of supportive housing for unaccompanied homeless youth. Overall, the City and County work with its partners to financial resources to create affordable housing and housing programs that assist homeless residents.

CDBG – Program funds. CDBG will also be used for the Block Nurse, Health Clinic, and Neighborhood Non-Profit programs, which provide assistance for persons with special needs.

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

Actions to address LBP hazards and increase access to housing without LBP hazards

Saint Paul-Ramsey County Public Health conducts ongoing comprehensive efforts involving outreach, identification, educations and treatment of lead based paint hazards. More specifically the Childhood Lead poisoning Prevention Program identifies children with elevated blood levels (>10 mcg/dL) in many ways. The State of Minnesota has an excellent screening, reporting and referral program. Public Health nurses, lead hazard control personnel, and City rehabilitation advisors also provide educational and outreach materials to families of children at-risk to lead and to property owners who are renovating their homes.

Saint Paul-Ramsey County Public Health provides an extensive educational and outreach program. The Public Health staff responds daily to numerous community phone inquiries about lead poisoning, lead hazard reduction, and lead testing. Additionally, the Public Health staff conducts in-services to parents, health care workers and others on lead screening, risk assessment, the symptoms and effects of lead poisoning and treatment methods.

Parents and property owners can also receive information on the prevention of lead poisoning and instructions on how to safely reduce lead hazards. To promote better understanding of lead-based paint hazards, these pamphlets are available in English, Spanish, Vietnamese, Russian, Arabic, and Somali languages.

Federal funding has enabled the City of Saint Paul to continue its successful effort of lead hazard control. Through the Healthy Homes and Lead Hazard Control Program, many homes occupied by children with elevated blood lead levels or at risk to lead poisoning have had substantial lead hazard control work completed.

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 window sills, 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:

- Applications receive the required lead-based paint information and understand their responsibilities.
- Staff properly determined whether proposed projects are exempt from some or all lead-based paint requirements.
- The level of federal requirements 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

The City of Saint Paul Workforce Development staff merged with Ramsey County Job Training staff in 2000 to form Workforce Solutions, the County-City workforce development service provider. Ramsey County is the fiscal agent and administrator of the program, which provides services throughout Ramsey County, including Saint Paul. Workforce activities are guided by the Workforce Investment Board, and Workforce Solutions operates three One-Stop Workforce Centers, two of which are located in Saint Paul. Workforce Solutions provides more than \$19 million for dislocated worker services, welfare employment services, adult services, and youth services (CDBG funding is also provided for the summer Youth Employment Program). 75% of the 2013 Workforce Solutions participants were Saint Paul residents. Over 3700 residents were placed in jobs and an additional 1600 received job training. The City of Saint Paul has been a key contributor and partner in the goal to eliminate racial employment disparities via *Everybody In*, a regional collaboration of community, business, education and government partners in the Twin Cities seven county metro area. The City and some of its subgrantees, carry out a number of economic development activities throughout the City. Activities include financial assistance to businesses, commercial rehabilitation assistance, and improvements to commercial corridors. Many of the businesses assisted created jobs for low and moderate income City residents. The City also works with the Saint Paul Port Authority to reclaim underused, sometime polluted sites, and develops industrial parks which provide living wage jobs for residents of Saint Paul.

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

Saint Paul has a number of programs and policies which have 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 provide assistance to 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, child care 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 of 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 takes a number of steps to help ensure that all activities carried out with HUD funding are in compliance with program regulations, and also meet their intended goals, including timely expenditure of funds. Listed below are the major components of the City's ongoing monitoring system.

Review of Proposals - All projects and programs proposed to receive HUD funding are reviewed by staff to determine if the activity is eligible, and if a national objective will be met.

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

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

On-Site Monitoring - Each year the City makes site visits to subgrantees carrying out federally funded 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. The on-site monitoring examines the subgrantees financial systems and controls, cost reasonableness of activities, income 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 each year. The CAPER details the progress and accomplishments of CDBG, HOME, and ESG funded activities. Information contained in the CAPER is taken from report forms submitted each time a project or program receives a reimbursement, which allows the City to track the progress of activities being carried out on an on-going basis. The City also makes updates to the HUD reporting system (IDIS) throughout the year.

Expected Resources

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

Introduction

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	6,384,098	365,902	0	6,750,000	25,650,000	Expected amount available for the remainder of consolidated plan reflects a 5% cut for 2016 and assumes steady funding for the remaining 3 years.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	1,427,984	0	0	1,427,984	5,600,000	Expected amount available for remainder of consolidated plan assumes a small decrease for 2016 and assumes steady funding for the remaining 3 years.
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	579,908	0	0	579,908	2,320,000	Expected amount available for remainder of consolidated plan assumes a small increase for 2016 and steady funding for the remaining 3 years.

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 match no less than 25 cents for each dollar of HOME funds spent on affordable housing. The City of Saint Paul receives a match reduction of 50%. The City currently has excess match carried over from previous fiscal years in the amount of \$4,370,684.41. The City of Saint Paul has enough excess match to meet the HOME match requirements for the next 5 years. The City anticipates it will continue to leverage other private and public funds in the development of HOME funded affordable housing and accumulate additional match.

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

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

Discussion

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Homeless Prevention	2014	2019	Homeless	Citywide	Homeless prevention strategies Assessing individual homeless persons' needs Emergency shelters and transitional housing	ESG: \$579,908	Homelessness Prevention: 3000 Persons Assisted
2	Development of New Housing	2014	2019	Affordable Housing	Citywide	Affordable Rental Housing Increase homeownership opportunities	CDBG: \$300,000 HOME: \$700,000	Rental units constructed: 15 Household Housing Unit Homeowner Housing Added: 2 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Housing Rehabilitation	2014	2019	Affordable Housing	Citywide	Preservation of Affordable Rental Housing Housing rehabilitation assistance Lead based paint	CDBG: \$2,750,000 HOME: \$727,984	Rental units rehabilitated: 38 Household Housing Unit Homeowner Housing Rehabilitated: 53 Household Housing Unit
4	Public Services	2014	2019	Non-Housing Community Development	Citywide	Fair Housing and housing discrimination. Public service needs Community outreach	CDBG: \$252,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 2000 Persons Assisted
5	Community Engagement	2014	2019	Non-Housing Community Development Crime prevention	Citywide	Public service needs Community outreach	CDBG: \$380,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 121000 Persons Assisted
6	Youth Employment	2014	2019	Non-Housing Community Development Employment	Citywide	Public service needs	CDBG: \$371,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 400 Persons Assisted
7	Economic Development	2014	2019	Non-Housing Community Development	Citywide	Economic development needs	CDBG: \$425,000	Facade treatment/business building rehabilitation: 2 Business Jobs created/retained: 2 Jobs Businesses assisted: 2 Businesses Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
8	Remediation of Substandard Properties	2014	2019	Non-Housing Community Development	Citywide	Acquisition, demolition, clearance of property	CDBG: \$659,000	Buildings Demolished: 16 Buildings

Table 55 – Goals Summary

Goal Descriptions

1	Goal Name	Homeless Prevention
	Goal Description	
2	Goal Name	Development of New Housing
	Goal Description	
3	Goal Name	Housing Rehabilitation
	Goal Description	
4	Goal Name	Public Services
	Goal Description	
5	Goal Name	Community Engagement
	Goal Description	
6	Goal Name	Youth Employment
	Goal Description	

7	Goal Name	Economic Development
	Goal Description	
8	Goal Name	Remediation of Substandard Properties
	Goal Description	

Projects

AP-35 Projects – 91.220(d)

Introduction

The project summary information provides a description and funding amount for each of the projects the City plans to undertake in HUD Fiscal Year 2015 with CDBG, HOME, and ESG funding. The Capital Improvement Budget Committee recommended the FY2015 capital projects through the 2014-15 capital improvement budget process.

Projects

#	Project Name
1	Acquisition Activities
2	Disposition Activities
3	Clearance Activities
4	Public Services
5	Housing Construction
6	Single Unit Rehabilitation
7	Multi-Unit Rehabilitation
8	Commercial Corridor and Citywide Economic Development
9	HOME Program
10	2015 Emergency Solutions Grant
11	Planning and Administration

Table 56 – Project Information

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

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

AP-38 Project Summary
Project Summary Information

1	Project Name	Acquisition Activities
	Target Area	Citywide
	Goals Supported	Remediation of Substandard Properties
	Needs Addressed	Acquisition, demolition, clearance of property
	Funding	CDBG: \$100,000
	Description	Project for CDBG acquisition activities.
	Target Date	12/31/2016
	Estimate the number and type of families that will benefit from the proposed activities	Properties acquired are intended for redevelopment of affordable housing or businesses that serve low/mod persons.
	Location Description	
	Planned Activities	Acquisition, demolition and remediation costs
2	Project Name	Disposition Activities
	Target Area	Citywide
	Goals Supported	Remediation of Substandard Properties
	Needs Addressed	Acquisition, demolition, clearance of property
	Funding	CDBG: \$159,000
	Description	Project for CDBG disposition activities.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	Activity is for management of property acquired for affordable housing activities or businesses who serve low/mod populations.
	Location Description	
	Planned Activities	Activity is for management of property acquired for affordable housing activities or businesses who serve low/mod populations.
3	Project Name	Clearance Activities
	Target Area	Citywide
	Goals Supported	Remediation of Substandard Properties
	Needs Addressed	Acquisition, demolition, clearance of property
	Funding	CDBG: \$400,000

	Description	Project for CDBG demolition activities.
	Target Date	12/31/2016
	Estimate the number and type of families that will benefit from the proposed activities	Slum/blight activities
	Location Description	
	Planned Activities	Slum/blight activities
4	Project Name	Public Services
	Target Area	Citywide
	Goals Supported	Public Services Community Engagement Youth Employment
	Needs Addressed	Non-housing community development Fair Housing and housing discrimination. Emergency shelters and transitional housing Public service needs Community outreach
	Funding	CDBG: \$1,003,000
	Description	Project for CDBG public service activities.
	Target Date	12/31/2016
	Estimate the number and type of families that will benefit from the proposed activities	Programs include services for youth, families and seniors. 123,400 low mod persons will be served.
	Location Description	
	Planned Activities	public service activities to include fair housing activities, community engagement, domestic violence prevention, criminal restorative justice, health care, employment training, conflict resolution, and emergency shelter.
5	Project Name	Housing Construction
	Target Area	Citywide
	Goals Supported	Housing Rehabilitation
	Needs Addressed	Housing rehabilitation assistance Increase homeownership opportunities

	Funding	CDBG: \$425,000
	Description	
	Target Date	12/31/2016
	Estimate the number and type of families that will benefit from the proposed activities	2 low/mod homeownership households
	Location Description	
	Planned Activities	Rehabilitation of vacant housing; may include acquisition, demolition or relocation.
6	Project Name	Single Unit Rehabilitation
	Target Area	Citywide
	Goals Supported	Housing Rehabilitation
	Needs Addressed	Housing rehabilitation assistance Lead based paint
	Funding	CDBG: \$2,050,000
	Description	Project for single unit rehabilitation activities.
	Target Date	12/31/2016
	Estimate the number and type of families that will benefit from the proposed activities	100 low/mod income homeowners
	Location Description	
	Planned Activities	Housing rehabilitation activities; may include hazardous materials removal, health and safety improvements and energy efficiency improvements.
7	Project Name	Multi-Unit Rehabilitation
	Target Area	Citywide
	Goals Supported	Housing Rehabilitation
	Needs Addressed	Preservation of Affordable Rental Housing Affordable Rental Housing Lead based paint
	Funding	CDBG: \$600,000
	Description	Project for multi-unit rehabilitation activities.

	Target Date	12/31/2016
	Estimate the number and type of families that will benefit from the proposed activities	23 low/mod households
	Location Description	
	Planned Activities	Multi-unit rehabilitation or development, including acquisition, demolition, and site preparation
8	Project Name	Commercial Corridor and Citywide Economic Development
	Target Area	Citywide
	Goals Supported	Economic Development
	Needs Addressed	Economic development needs
	Funding	CDBG: \$425,000
	Description	Activities to assist businesses with expansion, property acquisition, rehabilitation, energy conservation improvements, leasehold improvements and development citywide.
	Target Date	12/31/2016
	Estimate the number and type of families that will benefit from the proposed activities	15 jobs will be created
	Location Description	
	Planned Activities	Economic development and business assistance activities; may include rehabilitation, acquisition, demolition, site preparation, development of commercial mixed use buildings and the provision of working capital and loan guarantees
9	Project Name	HOME Program
	Target Area	Citywide
	Goals Supported	Development of New Housing Housing Rehabilitation
	Needs Addressed	Preservation of Affordable Rental Housing Affordable Rental Housing Housing rehabilitation assistance
	Funding	HOME: \$1,427,984

	Description	The HOME Program funding may be used for CHDO development and operating activities (the City has met the cumulative 15% CHDO set-aside, so allocating funds to a CHDO is not required this year), City projects, administration, and subrecipient projects. Activities may include single family and multi-family rehabilitation and development, as well as homebuyer assistance. The homebuyer assistance projects will use the resale/recapture criteria being submitted to HUD with this plan. The HOME match requirement will be met with excess match from previous years, as well as match leveraged from new projects. Proposals for HOME funding are accepted throughout the year, and affirmative marketing is required (the MHFA Fair Housing Marketing Plan is used).
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	New construction and rehabilitation activities; may include single family and multi-family rehabilitation and development as well as homebuyer assistance. Includes City projects, administration and subrecipient activities.
10	Project Name	2015 Emergency Solutions Grant
	Target Area	Citywide
	Goals Supported	Homeless Prevention
	Needs Addressed	Homeless prevention strategies Assessing individual homeless persons' needs Emergency shelters and transitional housing Community outreach
	Funding	ESG: \$579,908
	Description	Activities to include homeless prevention, operating costs of shelters, essential services, street outreach, rapid rehousing, and ESG administration.
	Target Date	12/31/2016
	Estimate the number and type of families that will benefit from the proposed activities	3000 homeless persons served

	Location Description	
	Planned Activities	Activities to include homeless prevention, operating costs of shelters, essential services, street outreach, rapid rehousing, and ESG administration.
11	Project Name	Planning and Administration
	Target Area	Citywide
	Goals Supported	
	Needs Addressed	Planning needs
	Funding	CDBG: \$1,350,000 HOME: \$142,798
	Description	Funding for the management, coordination, oversight, and monitoring of the CDBG program, and for costs included in the City's approved Indirect Cost Plan. Funding for planning activities in CDBG eligible areas of the City, as well as environmental and historic reviews of HUD funded projects. Funding for costs included in the City's approved Indirect Cost Plan.
	Target Date	12/31/2016
	Estimate the number and type of families that will benefit from the proposed activities	Administration and Planning
	Location Description	
	Planned Activities	Administration and Planning

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 2015 activities have an address specific location. All of the activities described in the Action Plan are programs which are available citywide, or have service areas that include one or more neighborhoods (districts) in the City.

A map which shows the areas of the City with at least 51% low/moderate income persons is titled as CDBG eligible block groups and tracts and included in the Appendix. All activities providing an area benefit being carried out in 2015 will have a service area that is located primarily in a shaded portion of the map.

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

Geographic Distribution

Target Area	Percentage of Funds

Table 57 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

<p align="left">By allocating investments city-wide geographically, the City of Saint Paul is working to prevent additional concentrations of low income and minority populations through targeted affordable housing projects.</p>

Discussion

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	30
Special-Needs	0
Total	30

Table 58 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	0
Rehab of Existing Units	30
Acquisition of Existing Units	0
Total	30

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

AP-60 Public Housing – 91.220(h)

Introduction

Saint Paul PHA owns and manages 4253 public housing units and administers 4587 of Housing Choice Vouchers (as of 10/1/2013, including 100 Family Unification Program, 117 DV, 81 Section 8 Mod rehab SRO, and 140 Veterans Affairs Supportive Housing Program.[1] The current and previous approved Plan is available on the HUD website at

<http://www.hud.gov/offices/pih/pha/approved/pdf/12/mn001v02>

Saint Paul PHA has maintained its “High Performer” status under HUD’s Public Housing Assessment (PHAS) for 24 consecutive years. Saint Paul PHA administers HOPE VI activities or Mixed-Finance Modernization and Development.

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

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

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

Public Housing: Saint Paul PHA will expand its public housing by building 6 new units at Roosevelt Townhomes (using Capital Fund Program/Replacement Housing Factor) and 4 new units at Mt. Airy Homes (preliminary approval using MHFA forgivable loan with HUD approval). Where possible, Saint Paul PHA would convert hi-rise space from non-dwelling uses to apartments for eligible residents. Saint Paul PHA will also explore other opportunities to acquire or construct a multi-family property for public housing rental.

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

Section 8 Housing Choice Voucher Program: Saint Paul PHA will maintain high utilization of vouchers without exceeding authorized limits. Saint Paul PHA will administer current agreements for Project-Based Vouchers (PBV), including PBVs for supportive housing developments that support Minnesota's Plan to End Long-Term Homelessness. Additionally, Saint Paul PHA will renew expiring PBV contracts at successful projects and offer up to 50 more vouchers for PBV use through 2016

Saint Paul PHA has more than its roughly 4,589 authorized vouchers in use (“overutilized”), so its waiting list will not open until later in 2015, and it may not issue new vouchers until 2016. In 2015, another large Twin Cities housing authority reopened its waiting list (closed since 2007) for 3½ days and accepted almost 35,000 applications. Only 2,000 households were put on the waiting list, selected by lottery. This lottery was randomly selected to include 95% residents of the Metro, and 5% from outside the Metro. St. Paul PHA will likely follow a similar model when opening its waiting list (i.e. all households can apply with a lottery for select number of positions). The City data supports issuing as many vouchers as possible to those with an Extremely Low Income who live, work or to go school in the city of St. Paul.

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

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

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

It should be noted that the Resident Advisory Board membership may fluctuate due to changes in Resident Council officers, residents moving out of public housing or leaving the Section 8 program, etc. Still, some public housing resident-leaders who are not currently members of the Presidents Council or City-Wide Resident Council actively participate in the RAB meetings. RAB meeting agendas are sent to all RAB members and Southern Minnesota Regional Legal Services, Inc. (SMRLS).

During the year, the Saint Paul PHA Senior Management meets with members of the Resident Advisory Board (including the Hi-Rise President Council and the Family Residents City-Wide Resident Council) to discuss PHA policy changes, PHA Annual Plan, and PHA Capital Improvements. As examples, Saint Paul PHA actively encourages discussions about planning capital improvements and PHA policies, such as expanding the Project Based Section 8 Housing Choice Voucher (PBV) program for which PHA received RAB support for renewing contracts and offering a limited number of additional PBVs. Additionally, Saint Paul PHA – Resident Initiative Department and the Resident Councils work together to form new partnerships with community service agencies.

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

At this time, Saint Paul PHA has no current plans to implement a Voucher Homeownership Program. For

over 20 years, Saint Paul PHA has operated a successful homeownership program (not using Section 8 vouchers) in conjunction with the Family Housing Fund and Thompson Associates. As of Sept. 2012, 291 families from public housing and Section 8 had purchased their own homes.

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

Not applicable. In 2014, Saint Paul PHA receive HUD's "High Performer" rating for the 24th consecutive year under HUD's "Public Housing Management Assessment Program" as well as Saint Paul PHA has a HUD "High Performer" status under HUD's Section 8 Management Assessment Program.

Discussion

As previously stated, Saint Paul PHA has High Performer status for both its Public Housing and Section 8 Housing Choice Voucher Program. Saint Paul PHA needs stable federal funding to maintain its high standards. That said, Saint Paul PHA will continue to advocate for full funding and program reform while preparing contingency plans for possible radical cuts in federal funding. At this time, Saint Paul PHA has no current plans for large-scale conversions of public housing to Section 8 or other forms of assisted housing. If Congress and HUD continue to under fund the Public Housing Operating Fund and Capital Fund, the PHA will consider selling additional scattered site homes and/or converting other public housing units to Section 8 tenant-based or project-based assistance. Staff has discussed this option with the Resident Advisory Board which expressed general support. Before taking such a course of action, the Saint Paul PHA would reconvene the Resident Advisory Board to discuss the details. [1]

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

Introduction

The City of Saint Paul proactively is addressing the problems of homelessness in numerous ways. Most important, the City has strengthened its relationships with Ramsey County and service providers to establish a coordinated system that serves homeless and "at-risk of being homeless" individuals, homeless families, and homeless youth. During 2015, the City's Housing Staff will continue to work closely with the Ramsey County Continuum of Care Coordinator and 18+ community agencies to create comprehensive homelessness prevention delivery services that can assist homeless single adults, homeless families, and homeless unaccompanied youth. The City will participate with the Ramsey County Continuum of Care Governing Board and the Ramsey County Family Homelessness Prevention Assistance Program to develop program services and program funding strategies in order to assist homeless residents of Saint Paul. Furthermore, in partnership with the Ramsey County, the City's ESG Program can respond to underserved homeless populations, such as new refugee families and homeless veterans.

The City also owns the Saint Paul Residence (120 units) at which Catholic Charities serves sixty (60) chronically-inebriated single adults (using a Housing First model) and sixty (60) at-risk of being homeless residents in the Midway neighborhood.

At the same time, the City supports innovative programs that serve homeless residents with mental illness. As an example, the Saint Paul Police Department works with Listening House (a day drop-in center for homeless residents) and South Metro Human Services to develop police services that are responsive to homeless residents with mental illness. The Police Department and Listening House "cross-train" new police cadets and street social workers to better serve homeless residents. Additionally, the Police Department and Listening House co-chair the Police-Downtown Community Homeless Forum to address the needs of homeless residents in Downtown Saint Paul.

In 2015, the City of Saint Paul will work with Catholic Charities and the State of Minnesota to develop a new Dorothy Day Center – an ambitious new emergency shelter and supportive housing project to be financed with State of Minnesota bonding dollars.

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

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

In the City of Saint Paul, outreach services to homeless persons (especially unsheltered persons) with assessment of their needs are provided, but not limited to the following services:

People Inc. – Metropolitan Homeless Street Outreach Program (MHSOP) provides street outreach to

unsheltered homeless adults[1] who experience mental illness in Ramsey County. Outreach specialist search for unsheltered adults in outdoor camps and in day-drop-in centers where homeless congregate. MHSOP services include providing street outreach, basic survival gear, and assistance in stabilizing mental illness symptoms, benefit assistance, and housing placement. Outreach Specialist address housing needs and offer access to Ramsey County Group Residential Housing Program to assist the participants to obtain and pay for housing

South Metro Human Services – ACCESS Program provides outreach and case management services to homeless adults with serious and persistent mental illness and substance abuse disorders in Ramsey County. The ACCESS staff visit most homeless shelters and drop-in centers in Ramsey County each week.

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

Street Outreach to Homeless Veterans will be provided by People Inc. as a program component of Minnesota Assistance Council for Veterans (MAC-V) Supportive Services for Veteran Families Program, funded by US Department of Veterans Affairs. The City's ESG program will partially fund these street outreach services to homeless veterans, which will occur in emergency shelters and places where homeless Veterans may congregate.

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

Streetworks – Lutheran Social Services may develop street outreach services to homeless youth during 2015.

Addressing the emergency shelter and transitional housing needs of homeless persons

Emergency Solutions Grant (ESG). The City will continue to allocate its Emergency Solutions Grant funds to partially fund the operations of agencies that provide homeless prevention services, emergency shelters, and transitional housing to assist homeless individuals, homeless families, and homeless youth. Saint Paul will allocate ESG funding for operating funds, street outreach, homelessness prevention, and rapid rehousing. The ESG funds are awarded on a competitive basis, with the proposals reviewed by the City staff and the Ramsey County, Continuum of Care Coordinator for final approval by City Council.

Rapid Rehousing. The City will use ESG funds for rapid rehousing services for homeless adults currently staying at the Dorothy Day Center Emergency Shelter as well as rapid rehousing services provided by SafeZone for homeless youth.

Winter-Overflow Emergency Shelter. The City will partner with Ramsey County to increase the number of shelter beds for the cold-weather winter months of 2015.

Transitional housing. The City will use ESG funds to partially pay for operating funds for transitional housing as well as award ESG funds to assist a transitional housing facility provide rapid rehousing services.

Dorothy Day Center ReVision. City staff are currently working with Catholic Charities to develop a new Dorothy Day Center. Phase 1 will include 278 shelter beds and 193 single room living units. City staff will also be working with Catholic Charities to develop Phase 2 with a new “Connection Center” and up to 170 additional housing units with a wide array of support services

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 participates with the Ramsey County Family Prevention Assistance Program, and the Ramsey County Continuum of Care to address the needs of homeless adults, homeless families, and homeless youth. Additionally, the City will participate with the following services during 2015:

Homeless Adults: The City-ESG funded Dorothy Day Rapid Rehousing Program provides case management and housing assistance to assist shelter residents move from Dorothy Day Center into permanent supportive housing.

Homeless Families: The City provides financing for affordable housing, including supportive housing, which provides more opportunities for at-risk of homeless families. The City's ESG funds organizations that serve homeless families, such as Catholic Charities–Family Service Center, the YWCA transitional housing, and Theresa Living Center. The City’s ESG also funds East Side Family Center, Southern Minnesota Regional Legal Services – Project Hope, and House Calls (utility assistance funds) as homeless prevention initiatives for at-risk homeless families.

Homeless Youth: The City and County recognized that the number of emergency shelter beds for homeless youth remain insufficient. In the recent years, the Otto Bremer Foundation provided grant funding to increase shelter capacity for homeless youth.[1] Subsequently, in 2014, the City Council approved STAR funding for the 180 Degrees project – a new 14-bed emergency shelter for homeless youth. In 2015, the City's ESG funds Salvation Army (emergency shelter), Lutheran Social Services (emergency shelter), Ain Dah Yung (emergency shelter) and Face-to-Face Safe Zone – a youth drop-in center (emergency shelter and a rapid rehousing program) – all programs for unaccompanied homeless youth. Additionally, the City works with Beacon Interfaith to develop Prior Crossing – an affordable housing project for homeless youth.

Homeless Veterans: Minnesota Assistance Council for Veterans (MACV) provides supportive housing

for six returning veterans and MACV has a supportive housing unit for women veterans. MACV also provides supportive services to homeless veterans including ESG-funded street outreach and homeless prevention assistance.

Affordable Housing: CDBG/HOME/Low Income Housing Tax Credits. Saint Paul uses CDBG funds, HOME Funds, and Low Income Housing Tax Credits, as appropriate, to construct or preserve affordable housing, including developing supportive housing for long-term homeless residents. In 2015, these financial tools will assist Jamestown Homes (preservation of affordable housing), Prior Crossing (new construction for homeless youth), and Hamline Station Family Housing (new construction).

[1] Ramsey County, Lutheran Social Services, Streetworks Collaborative, Ain Dah Yung, and Salvation Army, worked diligently to highlight the need for additional emergency shelter beds for homeless youth. Otto Bremer Foundation responded with a \$4 million grant for six Twin Cities projects, including one grant for 11 beds at the Salvation Army Booth Brown House (which is also receives a \$15,000 operating ESG operating subsidy).

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

Ramsey County provides specific programs and counseling to previously-institutionalized or homeless individuals through partnerships with nonprofit service providers to assist in the transition to permanent housing. This relationship is the primary network that performs this function and includes assistance such as help with security deposit, child care, job training, transportation, mental health counseling, chemical dependency treatment, and job search assistance. On the other hand, since 2002, the City of Saint Paul has developed supportive housing facilities, such as Crestview, Visitation, and Jackson Street Village, Jeremiah Program, St. Christopher's Place, and Saint Paul's Residence, which serves at-risk individuals and families.

In 2015, the City is providing HOME funds to Prior Crossing – 44 units of supportive housing for unaccompanied homeless youth. Overall, the City and County work with its partners to finance resources to create programs that assist homeless residents. The City's CDBG Program Funds can also be used for the Block Nurse Program and neighborhood non-profit programs, which provide assistance for persons with special needs.

Discussion

In summary, affordable housing and supportive services are provided within the City of Saint Paul to homeless residents and residents who are not homeless but need supportive housing, including the

elderly, frail elderly, persons with disabilities, persons with HIV/AIDS, persons with chemical dependency, and persons with limited English-speaking proficiency. That said, these diverse communities have often stated that more affordable housing and more affordable supportive housing are needed citywide. In response, the City of Saint Paul has adopted a Comprehensive Plan including a Housing chapter with strategies to facilitate the development of affordable housing.

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

Introduction:

The City has affordable housing opportunities including 12,228 publicly-assisted housing units and 4,589 Section 8 vouchers. (approximately 36% of all City renters receive some housing assistance)[**1**] Yet, the biggest barriers to securing affordable housing are 1) many households lack sufficient incomes to rent modestly-priced apartments[**2**] and 2) the lack of affordable housing opportunities.

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

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

In response, the City’s Affordable Housing Policy requires that city-financed rental projects have 10% of the units affordable at 30% AMI and 10% of the units affordable at 50% AMI. Furthermore, the City’s Locational Choice Policy and the City’s Low Income Housing Tax Credit Selection Process encourage “a more equitable distribution of affordable housing” citywide. Even with seemingly insurmountable barriers, the City has partially financed the preservation, renovation, or new construction of 275 affordable rental housing units– using combined financing, such as low-income housing tax credits, federal funds, such as CDBG, NSP, HOME, TIF, and City’s STAR funds.

Still, the City needs federal and state support to finance affordable housing developments. Therefore, the lack of sufficient federal funding and sufficient allocation of low income housing tax credits – as public policies – have negative effects on affordable and residential investments. In 1975, the City received CDBG fund \$18,835,000. Forty years later, the City’s CDBG funding is \$6,384,098. Similarly, the City received HOME funds of \$2,316,000 in 2000; the City may receive \$1,427,984 in 2015. At the same time, the State of Minnesota may reallocate a portion of the City’s Low Income Housing Tax Credits. In the face of increasing need, the City has less federal funds and may have less low income housing tax credits to finance affordable housing and residential investment.

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

As previously stated, Saint Paul has 16,460 publicly-assisted affordable housing. In this section, the City’s

Action Plan (2015) will identify actions to overcome identified barriers to affordable housing, such as follows:

Lack of Sufficient Funding and Land for Publicly-Assisted Housing. Major barriers to developing publicly-assisted affordable housing in Saint Paul are the lack of sufficient funds and lack of available land to meet the affordable housing needs in Saint Paul. In response, the City will finance the preservation, renovation, or new construction of affordable rental housing units citywide– using City-owned land and City financing, such as low-income housing tax credits, federal funds, such as CDBG, NSP, HOME, TIF, and City’s STAR funds for the 2015 projects

Discussion:

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

Zoning Code/Land Use Controls/Growth Limitations: In recent years, the City amended its zoning code to increase housing density on high-use transportation corridors. Furthermore, the City’s Zoning Code classifies supportive housing as multi-unit housing, similar to apartment buildings. Additionally, the City’s Zoning Code was amended to facilitate the development of supportive housing in industrial areas for chronically-inebriates.

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

Summary: The City of Saint Paul has working relationships with the federal and state governments to develop affordable housing in Saint Paul. Furthermore, the City has adopted Affordable Housing Policies that support the development of affordable housing citywide. That said, the City lacks the financial capacity to meet the affordable housing needs of all its citizens. Therefore, any federal and state budgetary restrictions-as public policies-consequently become the major barriers to developing affordable housing in Saint Paul.

AP-85 Other Actions – 91.220(k)

Introduction:

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

Actions planned to address obstacles to meeting underserved needs

In 2015, the City will address many of its underserved needs through the activities of the ongoing, multi-year HUD funded housing programs. The production and preservation of large family units, and units for very low and extremely low income households will be accomplished through the various homeowner, homebuyer, multi-unit, and new housing development programs carried out by the City and its subgrantees with CDBG and HOME funding. The largest obstacle to meeting underserved needs is a lack of funding for these costly activities.

Actions planned to foster and maintain affordable housing

In 2015, the City will continue to use the majority of its CDBG funding, and all of its HOME and ESG funding for affordable housing activities. Projects and programs which provide assistance for homebuyers, homeowner rehabilitation, rental rehabilitation, and new construction of affordable housing will be carried out by the City and subgrantees. Descriptions of the specific projects and programs can be found in the Consolidated Plan Listing of Projects section of this document. In addition to the HUD funded activities, the City will carry out housing projects in conjunction with the Minnesota Housing Finance Agency, the Metropolitan Council, the Minneapolis-Saint Paul Family Housing Fund, and the Saint Paul Housing and Redevelopment Authority. As of January, 2015, the City estimates that there are approximately 1270 vacant residential buildings in the City. The City will use the 60% tax credit rent for determining affordable rents for rental housing that is assisted with CDBG funding. HOME projects will use the established HOME rents.

Actions planned to reduce lead-based paint hazards

Saint Paul will continue to comply with the HUD regulations concerning lead based paint, including notifying applicants of the lead requirements, performing lead screening, requiring abatement by certified workers, and completing clearance testing on HUD funded housing projects. The City will also continue to work with Ramsey County on the window replacement program for homes with children and identified lead paint issues.

Actions planned to reduce the number of poverty-level families

In 2015, the City will again provide funding for youth workforce development activities and other related public service activities, which complement the programs provided by Ramsey County, who is the primary provider of public services in Saint Paul. The workforce activities include outreach to participants, participant assessment, basic skills training, job training, job placement, work experience,

and follow up. The City will continue to give preference to businesses that are comprised of and employ Section 3 residents. The City and some subgrantees also carry out programs that provide assistance to businesses, which may create jobs for low/moderate income persons.

Actions planned to develop institutional structure

Saint Paul's institutional structure gives the City the opportunity to partner with many organizations. In 2015 the City of Saint Paul Department of Planning and Economic Development (PED) will again work with other City departments, as well as other levels of government (County, State, Federal), non-profit organizations, and private sector developers to plan and implement housing, economic development, and community development activities. Faith based organizations, such as Catholic Charities and the YWCA, are very involved in planning and implementing homeless activities.

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

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

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

Saint Paul will continue to coordinate services with Ramsey County (the primary public service provider in the City), and the Saint Paul Public Housing Agency (the administrator of public housing and vouchers in Saint Paul) in 2015. The City will also work with adjacent units of government on the regional Analysis of Impediments to Fair Housing Choice. The City will continue to work with Community Development Corporations (CDCs), other non-profit organizations in the City, and the private sector (businesses, developers, social service agencies) to provide housing, economic development, and community development services. City economic development programs provide gap financing, which requires businesses seeking assistance to work with banks and other private sector businesses, as well as CDCs and the Saint Paul Port Authority on commercial and industrial projects. This coordination helps

maximize the amount of non-HUD funds invested in these projects.

Discussion:

Program Specific Requirements

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

Introduction:

This section addresses the program-specific requirements for the City of Saint Paul's 2015 Annual Action Plan. The City is scheduled to receive \$6,384,098 of CDBG funding, \$1,427,984 of HOME funding, and \$579,908 of ESG funding. The 2015 proposed activities are listed in a previous section of this plan. The City will also receive CDBG program income, which will be used to help fund the activities identified in this plan.

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	365,902
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
Total Program Income:	365,902

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.	79.00%

HOME Investment Partnership Program (HOME)
Reference 24 CFR 91.220(l)(2)

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

<p align="left">The City does not plan any additional forms of investment beyond eligible uses of HOME funds identified in 92.205.</p>

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 guidelines for resale and recapture are included in the following appendix.

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 guidelines for resale and recapture are included in the following appendix.

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. The City includes subordination requirements in its *HOME Funded Home Buyer Requirements & Resale/Recapture Criteria*, which is attached in the following appendix.

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

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

The 2014-2015 Saint Paul ESG Action Plan is attached in the following appendix.

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

The Ramsey County Continuum of Care has an established centralized coordinated assessment that meets HUD requirements for families experiencing homelessness in Ramsey County. In the third quarter of 2014, Ramsey County Coordinated Access to Housing and Shelter (CAHS) received 771 total calls from eligible Ramsey County families seeking supportive housing or emergency shelter.

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

Ramsey County COC is currently developing coordinated assessment for homeless single adults and unaccompanied youth. That said, Ramsey County COC must seek local funding for these coordinated assessment systems.

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

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

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

The City ESG and County COC supports the participation of homeless residents on various issues and projects, such as the Ramsey County Continuum of Care and the Family Homelessness Prevention

Assistance Program Committee. It is encouraging to see some homeless residents become empowered by their ongoing participation with the Homeless Advisory Board. Additionally, many ESG subgrantees have participant-driven programming, such that subgrantees encourage input from program participants, including individualized case management meetings, client satisfaction surveys, and group meetings during which program participants can review services, plan events and activities, and help provide solutions to problems and concerns.

5. Describe performance standards for evaluating ESG.

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

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

Discussion:

Attachments

Grantee Unique Appendices

City of Saint Paul HOME Funded Home Buyer Requirements & Resale/Recapture Criteria

General provisions

- Buyers of housing units assisted with HOME subsidy funds must have incomes at 80% or less of area median income (AMI), adjusted for family size.
- The property must be the principal residence of the buyer during the affordability period.
- The property value must be less than the HUD established maximum property value.
- The property must meet minimum property standards.
- In the event HOME assistance is used in conjunction with HUD ADDI funds, the buyers must be first-time homebuyers.
- The amount of HOME funding may not exceed the HOME subsidy limits.
- The minimum Affordability Period (with the exception of ADDI assistance) is based on the amount of HOME assistance provided:
 - <\$15,000 of HOME Funds 5 yrs
 - \$15,000-\$40,000 10 yrs
 - >\$40,000 15 yrs

In the event HOME assisted projects include both direct and indirect subsidies, the affordability period is calculated on the direct assistance only.

In the event senior mortgage loan liens on HOME assisted units are refinanced, current City/HRA policies and rules regarding subordination requests will apply. Generally, subordination of HOME loan liens will be approved:

- To allow a lender to pay-off a home owner's secured debt at prevailing market rates and fees, which is senior to the HOME lien. (Subordination will not be approved for sub-prime loans, open-ended lines of credit or junior liens.)
- To allow the home owner to obtain a secured home improvement loan to make capital improvements.
- Subordination will not be approved for paying off consumer debt or taking cash out.

Options

The selection of either the "Recapture" or "Resale" option must be made at the time initial HOME assistance is provided. Properties subject to the "Resale" option because the HOME assistance is in the form of a development subsidy will not be allowed to also receive HOME assistance for down payment or closing cost assistance.

If the property is sold **before the end** of the HOME required affordability period:

- When the HOME assistance is in the form of a direct subsidy to the buyer (e.g., down payment and closing cost assistance), either the "Recapture" or "Resale" option may be selected.
- When the HOME assistance is in the form of a development subsidy, the "Resale" option must be selected.

If the property is sold **after** the HOME required affordability period:

- The "Resale" requirements no longer apply.
- The "Recapture" requirements apply for a minimum of ten years. (The Recapture requirements apply for the HOME required affordability period or ten years, whichever is greater.)

Resale Provisions

If the property is sold during the HOME required affordability period (5-15 years), the following conditions must be met:

- The property must be sold to a buyer with income verified at 80% or less of AMI adjusted for family size.
- The sale price must be "affordable" (as defined below) to the new buyer. If necessary, the City will provide down payment or other assistance to the new buyer to help ensure that the property is affordable to a large range of potential buyers, and that the original homebuyer receives a fair return on their original investment and capital improvements they have made to the property.

"Affordable" is defined as the purchase price which is based on FHA underwriting standards (underwriting based on 33% of monthly income for PITI [principal, interest, property taxes & insurance]) and a current, fixed interest rate, for a 30-year mortgage loan.

An estimated affordable purchase price assumes the buyer has a household size of 1.5 persons per bedroom, and 95% of the purchase price is financed and the loan is based on FHA underwriting standards [above].

- The original homebuyer (and any subsequent sellers during the HOME required affordability period) must receive a "fair return on investment."

"Fair return on investment" is defined as the sales price of the unit (not greater than the appraised value), minus the then current indebtedness (all outstanding principal & interest payment obligations) and reasonable sales costs including real estate sales commission, but not greater than the "affordable" purchase price to a household with income at 80% of AMI.

- At time of resale, homebuyer must receive a fair return on investment, including capital improvements, which are defined as improvements to the home that are not considered maintenance related expenditures. The City will use the average change in the Consumer Price Index over the period of ownership to calculate a fair return as its standard index for fair return on the investment.
- The property must have deed restrictions or land covenants to enforce resale restrictions.

If a subsequent buyer(s) does not receive additional HOME assistance, the affordability period for a subsequent buyer(s) is the remaining time for the initial buyer. If additional HOME assistance is provided to a subsequent buyer(s), the initial buyer affordability period is terminated and a new buyer affordability period is started based on the amount of the new HOME assistance.

In the event HOME funds are used as a development subsidy in projects developed by Twin Cities Habitat for Humanity or Rondo Community Land Trust, the Resale provisions utilized by these entities will apply, but the HOME Resale requirements period will not exceed the maximum HOME required period. The following are their Resale requirements:

Habitat for Humanity (TCHFH)

30 Year Affordability:

TCHFH incorporates into its second mortgages a home repurchase clause which extends for a fixed 30-year term TCHFH's right to repurchase the home in accordance with a predetermined formula, in order to guarantee 30 years of affordability and still offer first mortgage terms of 20 and 25 years, the second mortgage remains in effect after the first mortgage is fully paid.

Years 1 through 5 Repurchase Formula:

The home repurchase formula will determine the selling price of the home to TCHFH. The home repurchase price will include all first mortgage payments made to-date plus reasonable costs of TCHFH authorized, documented improvements plus the remaining first and second mortgage balances which are then subsequently paid or forgiven. The repurchase formula will grant TCHFH 100% of market appreciation during the first 5 years of ownership.

Years 6 through 30 Repurchase Formula:

The home repurchase formula will determine the selling price of the home to TCHFH. After five years, the home repurchase price will include all first mortgage payments made to-date plus reasonable costs of TCHFH authorized, documented improvements plus the remaining first and second mortgage balances which are then subsequently paid or forgiven. Additionally, the owner retains 25% of the market appreciation since purchase. This price formula will be in effect for a fixed 30 year term.

Rondo Community Land Trust (RCLT)

Home buyers enter into a 99-year renewable ground lease the day they purchase a home. If RCLT does not already own the land beneath the home, it will take title at the time of closing. If the home buyer wishes to sell the home, they must adhere to one of the following:

- The house may be sold to Rondo, who has first right of refusal;
- The house may be sold to another low-moderate income buyer;
- The home may be given to another person listed on the ground lease, provided the new owners abide by the ground lease; or
- The home may be given to another person, provided s/he meets the income guidelines and agree to abide by the ground lease.

Other provisions are as follows:

1. The sale price must be "affordable" to the new buyer.

"Affordable " is defined the cost of housing that does not exceed 30% of household's monthly income for PITI (principal, interest, taxes & insurance). The household has sufficient income to support housing costs and is pre-qualified for a mortgage as evidenced by a letter from a lending institution.

2. The original homebuyer (and any subsequent sellers during the HOME required affordability period) must receive a "fair return on investment."

"Fair return on investment" is defined as 25% of the property's appreciation over the initial purchase price.

Additional information is in Attachment.

Recapture Provisions

- During the HOME program required affordability period, the property may be sold to any willing buyer, but the HOME subsidy funds must be repaid. The subsidy principal amount is due-on-sale of the property with 0% simple interest per year. If the net proceeds from the sale of the property are insufficient to repay the HOME subsidy, only the net proceeds must be repaid. If more than one entity has provided HOME assistance to the property, and the net proceeds are insufficient to fully repay each entity, each entity will be repaid on a pro rata basis.

AMERICAN DREAM DOWNPAYMENT INITIATIVE

The loan terms of the American Dream Down Payment Initiative will be administered as follows:

1. Maximum loan amount may not exceed the greater of 6% of the purchase price or \$10,000, not to exceed \$14,999.
2. 0% Interest.
3. 5 year term, total loan amount forgiven after 5 years.
4. ADDI will not be used with other HOME funds.

Rondo Attachment

Rondo Community Land Trust works within the priorities set by the community, exploring various developmental methods and remaining flexible in its revitalization approaches. Rondo CLT works directly with homebuyers by providing purchase price buy-down and rehabilitation grants for houses for sale within the community. Households whose incomes are between 50 and 80% of the Twin Cities area median income qualify for Rondo CLT's LHP program.

Rondo CLT creatively meets housing needs while preserving the economic and cultural diversity of the community using the land trust model of homeownership. While the land trust model has proven successful for over 90 years in preserving undeveloped land, it has been used to maintain housing affordable for just over 20 years. Homebuyers purchasing houses through community land trust programs buy *only the house*, and enter into a 99-year "ground lease" for the land. The land remains the property of the community land trust, which is governed by a Board of Directors, made up of land trust homeowners, affordable housing advocates and other community members. To ensure affordability for future generations, Rondo CLT's ground lease includes a limited appreciation formula that is used upon resale of the home. If and when the homeowner decides to sell their house, the ground lease requires them to sell it to another household of low-to moderate income for the original sales price plus 25% of any appreciation in the home's value. This allows the home to remain affordable for the next generation of low-income homebuyers, and allows the original buyer to gain equity in their home. The need to continually re-subsidize or lose the property's affordability due to real estate speculation is eliminated. The initial investment in affordable housing is recycled again and again. Equally as important, this affordable housing option gives houses with low to moderate incomes the opportunity to earn equity and appreciation in the real estate market not available in the rental market.

CITY OF SAINT PAUL
HOME Program Refinancing Guidelines
For Homeowner and Rental Rehabilitation Projects

HOME funds may be used in conjunction with rehabilitation to refinance existing debt on homeowner rehabilitation or rental rehabilitation projects. Refinancing only without rehabilitation is not an eligible HOME activity.

For single family homeowner rehabilitation projects, the refinancing must be necessary to reduce the owner's overall housing costs and make the housing more affordable. It cannot be used for the purpose of taking equity out of the property. The amount of debt refinanced cannot exceed the rehabilitation costs.

For multifamily properties, refinancing must be necessary to permit or continue long-term affordability as part of a rehabilitation activity. Again, the amount of debt refinanced cannot exceed the rehabilitation costs.

Minimum guidelines for providing refinancing for a homeowner or rental rehabilitation project using HOME funds are as follows:

- Rehabilitation must be the primary activity, and the rehabilitation to refinance ratio must be greater than 1:1 (rehab:refi).
- Management practices must be reviewed to demonstrate that disinvestment in the property has not occurred, and that the long-term needs of the project can be met, and the feasibility of servicing the targeted population over an extended affordability period can be demonstrated.
- The number of HOME units being rehabilitated needs to be defined, and the existing number of affordable units need to be maintained, and/or additional affordable units must be added.
- Investment of HOME funds for refinancing are available throughout the City of Saint Paul.
- The affordability period for the refinancing will be a minimum of 15 years and longer depending on amount of HOME funding.
- HOME funds can be used to refinance and rehabilitate an existing project with HOME funds during the affordability period but HOME funds cannot be used to refinance multi-family loans made or insured by any other Federal program. (e.g. FHA loans, CDBG, or HUD multifamily mortgages.)

Approved by City Council on April 8, 2015 as part of Consolidated Plan approval.

**CITY OF SAINT PAUL, MINNESOTA
EMERGENCY SOLUTIONS GRANT
2015 ACTION PLAN**

Information regarding the 2015 Action Plan
Please call Joe Collins, Saint Paul Planning and Economic Development Department at 651-
266-6020 or joe.collins@ci.stpaul.mn.us

Table 3

Consolidated Plan Listing of Projects

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

Project Description

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

Objective Category: Suitable Living Environment Decent Housing Economic Opportunity

Outcome Category: Availability/Accessibility Affordability Sustainability

Location: Community Wide

Objective Number Housing 4 Homeless 1 - 4	Project ID 14	Funding Sources: CDBG
HUD Matrix Code 03C	CDBG Citation 570.201(C)	ESG
Type of Recipient Subrecipient	CDBG National Obj.	HOME
Start Date 01/01/15	Completion Date 12/31/15	HOPWA Total Formula 541,808
Performance Indicator Persons	Annual Units 1200	Prior Years Funding Assisted Housing
Local ID	Units Upon Completion 2000	PHA Other Funding
		Total 541,808

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

Table 3

Consolidated Plan Listing of Projects

Applicant's Name City of Saint Paul, MN
Priority Need Homeless
Project Title Emergency Solutions Grant – Street Outreach

Project Description

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

Objective Category: Suitable Living Environment Decent Housing Economic Opportunity
 Outcome Category: Availability/Accessibility Affordability Sustainability
Location: Community Wide

Objective Number Housing 4 Homeless 1 – 4	Project ID 14	Funding Sources: CDBG
HUD Matrix Code 03C	CDBG Citation 570.201(C)	ESG (maximum) \$20,000
Type of Recipient Subrecipient	CDBG National Obj.	HOME HOPWA
Start Date 01/01/15	Completion Date 12/31/15	Total Formula \$20,000 Prior Years Funding Assisted Housing
Performance Indicator Persons	Annual Units Outreach to approximately 50 persons	PHA Other Funding
Local ID	Units Upon Completion Outreach to approximately 50 persons	Total (max allocation) \$20,000

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

Table 3

Consolidated Plan Listing of Projects

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

Project Description

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

Objective Category: Suitable Living Environment Decent Housing Economic Opportunity

Outcome Category: Availability/Accessibility Affordability Sustainability

Location: Community Wide

Objective Number	Project ID	Funding Sources:
Housing 4 Homeless 1 – 4	14	CDBG
HUD Matrix Code	CDBG Citation	ESG \$276,000
03C	570.201(C)	HOME
Type of Recipient	CDBG National Obj.	HOPWA
Subrecipient		Total Formula \$276,000
Start Date	Completion Date	Prior Years Funding
01/01/15	12/31/15	Assisted Housing
Performance Indicator	Annual Units	PHA
Persons	750 persons	Other Funding
Local ID	Units Upon Completion	Total (estimated) \$276,000
	200	

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

Table 3

Consolidated Plan Listing of Projects

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

Project Description

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

Objective Category: Suitable Living Environment Decent Housing Economic Opportunity

Outcome Category: Availability/Accessibility Affordability Sustainability

Location: Community Wide

Objective Number Housing 4 Homeless 1 – 4	Project ID 14	Funding Sources: CDBG
HUD Matrix Code 03C	CDBG Citation 570.201(C)	ESG \$90,000 HOME
Type of Recipient Subrecipient	CDBG National Obj.	HOPWA Total Formula \$90,000
Start Date 01/01/15	Completion Date 12/31/15	Prior Years Funding Assisted Housing
Performance Indicator Persons	Annual Units 50 households (approximately)	PHA Other Funding
Local ID	Units Upon Completion 50 households (approximately)	Total Estimated \$90,000

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

Table 3

Consolidated Plan Listing of Projects

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

Project Description

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

Objective Category: Suitable Living Environment Decent Housing Economic Opportunity

Outcome Category: Availability/Accessibility Affordability Sustainability

Location: Community Wide

Objective Number Housing 4 Homeless 1 – 4	Project ID 14	Funding Sources: CDBG
HUD Matrix Code 03C	CDBG Citation 570.201(C)	ESG \$100,173 HOME
Type of Recipient Subrecipient	CDBG National Obj.	HOPWA Total Formula \$100,173
Start Date 06/01/13	Completion Date 12/31/14	Prior Years Funding Assisted Housing
Performance Indicator Persons	Annual Units Approximately 30 households 50 persons	PHA Other Funding
Local ID	Units Upon Completion Approximately 30 households 50 persons	Total (approximately) \$100,173

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

Table 3

Consolidated Plan Listing of Projects

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

Project Description

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

Objective Category: Suitable Living Environment Decent Housing Economic Opportunity

Outcome Category: Availability/Accessibility Affordability Sustainability

Location: Community Wide

Objective Number Housing 4 Homeless 1 – 4	Project ID 14	Funding Sources: CDBG
HUD Matrix Code 03C	CDBG Citation 570.201(C)	ESG \$40,635
Type of Recipient Subrecipient	CDBG National Obj.	HOME HOPWA
Start Date 06/01/13	Completion Date 12/31/14	Total Formula \$40,635 Prior Years Funding Assisted Housing
Performance Indicator Persons	Annual Units Approximately 1373 persons served	PHA Other Funding
Local ID	Units Upon Completion Approximately 1373 persons served	Total (estimated) \$40,635 (7.5% of overall grant award)

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

Table 3

Consolidated Plan Listing of Projects

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

Project Description

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

Objective Category: Suitable Living Environment Decent Housing Economic Opportunity
 Outcome Category: Availability/Accessibility Affordability Sustainability

Location: Community Wide

Objective Number Housing 4 Homeless 1 – 4	Project ID 14	Funding Sources: CDBG
HUD Matrix Code 03C	CDBG Citation 570.201(C)	ESG \$15,000 HOME
Type of Recipient Subrecipient	CDBG National Obj.	HOPWA Total Formula \$15,000
Start Date 06/01/13	Completion Date 12/31/14	Prior Years Funding Assisted Housing
Performance Indicator Persons	Annual Units Approximately 1373 persons served	PHA Other Funding Total (estimated) \$15,000*
Local ID	Units Upon Completion Approximately 1373 persons served	*Actual need of HMIS may be higher.

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

**CITY OF SAINT PAUL
2015 EMERGENCY SOLUTIONS GRANT PROGRAM – ACTION PLAN**

OVERVIEW: For 2015, the City intends to allocate its Emergency Solutions Grant (“ESG”) funds to agencies that provide homeless prevention services, emergency shelter facilities, transitional housing, rapid rehousing services, counseling services, and street outreach services. The ESG funds will be awarded on a competitive basis with proposals reviewed by the City, Ramsey County Continuum of Care Coordinator, former *Heading Home Ramsey – Plan to End Homelessness* Coordinator, City Council, and Mayor’s Administration. In general, approximately 18 – 22 community agencies that serve Saint Paul residents who are homeless or at-risk of being homeless apply annually for ESG funds for which the City Council considers for final approval. Prior to the 2015 ESG Program, the City had amended its Consolidated Plan so that the City’s Emergency Solutions Grant Program can place additional emphasis on rapid rehousing services and street outreach.

During 2015, the City will continue to partner with Ramsey County to implement the County’s Continuum of Care program which provides homelessness prevention and rapid rehousing services to homeless single adults, homeless families, and homeless youth. During the HUD year, the City and County staff will work with Ramsey County Continuum of Care Coordinator and community agencies to develop a pilot program for coordinated entry and coordinated assessment for single adults – pending available funding since the County Continuum of Care have already allocated Family Homelessness Prevention Assistance Program (“FHAP”) funds for a coordinated assessment process for homeless families seeking emergency shelter.

During the HUD year, the City will continue to participate with the Ramsey County Continuum of Care, the Ramsey County COC Governing Committee, and Ramsey County FHAP Committee to implement *Heading Home Ramsey* – a comprehensive plan to end homelessness in Ramsey County.¹ Additionally, the City is working with State of Minnesota Veterans Homelessness Advisory Committee to develop a housing initiative to serve homeless veterans. At the same time, the City of Saint Paul will continue to own Saint Paul Residence which provides 120 units of

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

support housing, including 60 units for chronically-inebriated residents. Additionally, during 2015, City staff will continue to work with Catholic Charities to determine the appropriate building facility to meet increasing service demand of homeless residents using the Dorothy Day Center.

Throughout the HUD year, the City will continue to support innovative programs that serve homeless residents with mental illness. For example, the Saint Paul Police Department works with Listening House and South Metro Human Services to develop police services that are responsive to homeless residents with mental illness. The Police Department and Listening House “cross-train” new police cadets and street social workers to better serve homeless residents. Additionally, the Police Department and Listening House co-chair the Police-Community Forum to address the needs of homeless residents in Downtown Saint Paul. In response to a recent Police-Community Forum, the City and County have financed an overflow shelter for homeless residents during the winter months. Additionally, the City and Catholic Charities developed a rapid rehousing program and street outreach to homeless residents who use the Downtown Saint Paul Central Library during the day.

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

Finally, it should be noted that CDBG funds are allocated to the Block Nurse and Neighborhood Non-Profit programs which provide assistance for homeless persons as well as persons with special needs. It goes without saying that the City is fortunate to have the Health Care for the Homeless (HCH) clinics that generally serve approximately 3500 unduplicated homeless residents annually at eight shelter and drop-in centers in Saint Paul. This program receives federal grant funds allocated from the Stewart McKinney-Bruce Vento Act to End Homelessness. The Health Care for the Homeless remains an essential service for our homeless residents. Furthermore during the 2015 ESG, Catholic Charities continued to provide rapid rehousing services to emergency shelter residents who are “medically-compromised” – so case managers can coordinate rapid rehousing services with appropriate health care services so that emergency shelter residents can secure and maintain permanent housing.

2015 ESG § 576.100 General provisions and expenditure limits.

For 2015 ESG, the City of Saint Paul will allocate its ESG funds to five program components: street outreach, emergency shelter, homelessness prevention, rapid re-housing assistance, and HMIS; as well as administrative activities. The five program components and the eligible activities that may be funded under each are set forth in 24 CFR §576.101 through §576.107. Eligible administrative activities are set forth in 24 CFR §576.108.

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

- (1) 60 percent of the recipient's fiscal year grant totaling \$300,703; or
- (2) The amount of Fiscal Year 2010 ESG grant was \$350,982.
- (3) The City will allocate up to 60% of its fiscal year grant to street outreach and emergency shelter activities.

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

2015 ESG STREET OUTREACH COMPONENT

Pursuant to C.F.R. §24 576.102., the City's ESG funds may be used for street outreach if provided to homeless youth or homeless single adults who live outside and have mental health challenges. The maximum allocation for street outreach will be \$20,000 for FY 2015. That said, due to the demand for emergency shelter, the City of Saint Paul will place a higher priority on paying for emergency shelter operations and essential services when allocating ESG funds under C.F.R. §24 576.100(b). Subrecipients that request ESG funds for street outreach must comply with C.F.R. §24 576.101, as follows:

- (a) *Eligible costs.* Subject to the expenditure limit in §576.100(b), ESG funds may be used for costs of providing essential services necessary to reach out to unsheltered homeless people; connect them with emergency shelter, housing, or critical services; and provide urgent, non facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility. For the purposes of this section, the term "unsheltered homeless people" means individuals and families who qualify as homeless under paragraph (1)(i) of the "homeless" definition under §576.2. The eligible costs and requirements for essential services consist of:
 - (1) *Engagement.* The costs of activities to locate, identify, and build relationships with unsheltered homeless people and engage them for the purpose of providing immediate support, intervention, and connections with homeless assistance programs and/or mainstream social services and housing programs. These activities may include initial needs assessment, eligibility assessment; providing crisis counseling; addressing urgent physical needs, such as providing meals, blankets, clothes, or toiletries; and actively connecting homeless residents to appropriate services, including mainstream social services and housing programs, such as emergency shelter, community-based services, permanent supportive housing, and rapid re-housing programs. Eligible costs may include the cell phone costs for street outreach workers during the performance of these activities.
 - (2) *Case management.* The cost of assessing housing and service needs, arranging, coordinating, and monitoring the delivery of individualized services to meet the

needs of the program participant. Eligible services and activities are as follows: using the centralized or coordinated assessment system; conducting the initial evaluation required under §576.401(a), including verifying and documenting eligibility; counseling; coordinating services; obtaining Federal, State, and local benefits; monitoring and evaluating program participant progress; providing information and referrals to other providers; and developing an individualized housing and service plan, including planning for permanent housing stability.

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

2015 ESG EMERGENCY SHELTER COMPONENT

In recognition of the local needs, the City's 2015 ESG funds will place a high priority on paying emergency shelter operations, including essential services, and some ESG funds will be allocated for homelessness prevention activities. That said, the City will not allocate any ESG funds for major rehabilitations, conversions or building renovations. Subrecipients requesting ESG funds for emergency shelter and essential services must comply with C.F.R. §24.576.102, as follows:

- (a) *General.* Subject to the expenditure limit in §576.100(b), ESG funds may pay for providing essential services to homeless families and individuals in emergency shelters and operating costs emergency shelters, including transitional housing.
- (b) *Essential services* may include case management, including using the centralized or coordinated assessment system. However, it must be noted that the City, Ramsey County, and community services providers are still developing a pilot coordinated assessment process for families -- pending approval of funding from State of Minnesota. If funded, then coordinated assessment process would include screening, initial evaluation, and diversion. As necessary, coordinated assessment will include more intensive evaluation in order to provide referral to emergency shelter or other community services. Eligible activities could include:

- (1) Conducting the initial evaluation required under §576.401(a), including verifying and documenting eligibility;
- (2) Counseling;
- (3) Developing, securing, and coordinating services and obtaining Federal, State, and local benefits;
- (4) Monitoring and evaluating program participant progress;
- (5) Providing information and referrals to other providers;
- (6) Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking; and
- (7) Developing an individualized housing and service plan, including planning a path to permanent housing stability.

(c) *Shelter operations.* For 2015, Saint Paul ESG funds may be used to pay eligible operating costs of emergency shelters or transitional housing, such as maintenance costs (including minor or routine repairs), rent, security, fuel, equipment, insurance, utilities, food, furnishings, and supplies necessary for the operation of the emergency shelter. NOTE: The ESG-Emergency Shelter Program Component is essential to the City/County Plan to End Homelessness. Therefore, in consultation with Ramsey County Continuum of Care and Saint Paul homeless service providers, the City places a high priority of allocating ESG funds for emergency shelter operations.

As part of the ESG Emergency Shelter Component, Saint Paul ESG may pay for the transportation costs of a program participant's travel for medical care, employment, child care, or other eligible essential services. Transportation costs may include cost of a program participant's travel on public transportation; service worker's transportation costs to visit program participants; or operating costs, such as cost of gas, insurance, taxes, and maintenance for the vehicle as necessary to transport program participants and/or staff serving program participants.

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

(c) *Non-funded costs for Saint Paul ESG.* In response to local needs, the City's ESG funds will not pay for costs incurred for day care, education services, employment assistance, job training, outpatient health services, life skills training, mental health services, mental health services, or substance abuse treatment services. Moreover, the City's ESG funds will not pay any renovation costs nor any costs to convert a building into an emergency shelter.

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

2015 ESG HOMELESSNESS PREVENTION ASSISTANCE

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

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

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

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

RISK FACTORS FOR DETERMINING ELIGIBILITY- PREVENTION ASSISTANCE.

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

Case managers will target ESG homelessness prevention services to program participants at or below 30% of area median income and who are most likely to become homeless without ESG homelessness prevention assistance. Additionally, case managers will target to households who are in the most of need of temporary assistance and most likely to achieve stable housing. Case

managers will use the City's ESG Screening tool to consider risk factors of individuals or families with Level 1 (minimum barriers) and Level 2 (moderate barriers) to maintaining housing. In determining eligibility for homelessness prevention assistance, case managers may also consider other risk factors, such as:

1. Eviction within 2 weeks from a private dwelling (including housing provided by family or friends);
2. residency in housing that has been condemned and is no longer meant for human habitation;
3. sudden and significant loss of income;
4. sudden significant increase in utility costs;
5. Mental health and substance abuse issues;
6. Physical disabilities and other chronic health issues, including HIV/AIDS;
7. Severe housing cost burden (greater than 50 percent of income for housing costs); homeless in last 12 months;
8. Young head of household (under 25 with children or pregnant);
9. Current or past involvement with child welfare, including foster care;
10. Pending foreclosure of rental housing;
11. High overcrowding (the number of persons exceeds health and/or safety standards for the housing unit size);
12. Past institutional care (prison, treatment facility, hospital);
13. Recent traumatic life event, such as death of a spouse or primary care provider;
14. Recent health crisis that prevented the household from meeting its financial responsibilities;
15. Credit problems that preclude maintaining stable housing; or
16. Significant amount of medical debt.

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

At risk of homelessness means.

- (1) An individual or family who:
 - (i) Has an annual income below 30 percent of median family income for the area as determined by HUD;
 - (ii) Does not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the "homeless" definition in this section; and
 - (iii) Meets one of the following conditions:
 - (A) Has moved because of economic reasons two or more times during the sixty (60) days immediately preceding the application for homelessness prevention
 - (B) Is living in the home of another because of economic hardship
 - (C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance

- (D) Lives in a hotel or motel and the cost of the hotel and motel stay is not paid or living situation will be terminated within 21 days after the date of application for assistance;
 - (E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 persons per room, as defined by U.S. Census Bureau;
 - (F) Is existing a publicly funded institution, or system of care (such as a healthcare facility, a mental health facility, foster care or other youth facility, or correction program or institution); or
 - (G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan.
- (2) A child or youth who does not qualify as "homeless" under this definition, but qualifies under section 387(3) of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637(11) of the Head Start Act (42, U.S.C. 9832(11)), section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6)), Section 330(h)(5)(A) of the Public Health Services Act (42 U.S.C. 254(h)(5)(A)), section 3(m) of the Food and Nutrition Act of 2008 (7, U.S.C 2012(m)), section 17(b)(15) of the Child Nutrition Act of 1966 (42, U.S.C. 1786(b)(15))
- (3) A child or youth who does not qualify as "homeless" under this definition, but qualifies under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)), and the parent(s) or guardian(s) of the child or youth if living with him or her. OR
- (4) An individual or family who will imminently lose their primary nighttime residence, provided that;
- (i) The primary nighttime residence will be lost within 14 days of the date of the application for homeless assistance;
 - (ii) No subsequent residence has been identified; and
 - (iii) The individual or family lacks the resources or support networks, e.g. family, friends, faith-based or other social networks needed to obtain other permanent housing;
- (5) Any individual or family who:
- (i) Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions related to violence against the individual or family member, including a child Is fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;
 - (ii) Has no other residence; and

- (iii) Lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, to obtain other permanent housing

ELIGIBLE ACTIVITIES

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

2015 ESG RAPID RE-HOUSING ASSISTANCE COMPONENT.

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

ELIGIBLE PROGRAM PARTICIPANTS – RAPID RE-HOUSING :

For 2015, ESG rapid re-housing assistance may assist extremely low-income adults, families, and youth/young adults who meet the criteria of "homeless" as defined in CFR 24, §576.2, as follows:

- (1) An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
 - (i) An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport or camping ground;

- (ii) An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); or
 - (iii) An individual who is exiting an institution where he or she resided for ninety (90) days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.
- (2) An individual or family who will imminently lose their primary nighttime residence, provided that
- (i) The primary nighttime residence will be lost within 14 days of the date of the application for homeless assistance; and
 - (ii) No subsequent residences has been identified; and
 - (iii) The individual or family lacks the resources or support networks (i.e. family, friends, faith-based or social networks, needed to obtain other permanent housing
- (3) Unaccompanied youth under 25 years of age, or families with children and youth who do not otherwise qualify as homeless but who
- (i) Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42, U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043c-2), Section 330 (h) of the Public Health Services Act (42 U.S.C. 254(h)), section 3 of the Food and Nutrition Act of 2008 (7, U.S.C 2012), section 17(b) of the Child Nutrition Act of 1966 (42, U.S.C. 1786(b)) or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);
 - (ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance; .
 - (iii) Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and
 - (iv) Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General

Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment; or

- (4) Any individual or family who:
- (iv) Is fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;
 - (v) Has no other residence; and
 - (vi) Lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, to obtain other permanent housing.

WRITTEN STANDARDS AND PROCEDURES FOR RAPID RE-HOUSING PROGRAM

See applicable provisions under §576.400.

ELIGIBLE ACTIVITIES FOR ESG RAPID RE-HOUSING PROGRAM

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

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

ESG funds may be used to provide housing relocation and stabilization services, short term rental assistance and/or medium rental assistance as necessary to assist homeless individuals or

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

1. Financial Assistance.

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

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

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

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

assistance agreements with the owner with a subsidy for the unit so eligible program participants can access to the unit); and

- A standard rental agreement must be in place; and
- No rental assistance will be provided to households receiving assistance from other public source for same time period (exception: rental arrears).

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

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

2. Housing Relocation and Stabilization Services.

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

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

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

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

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

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

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

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

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

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

Housing Stability Case Management. ESG funds may pay costs of assessing, arranging, coordinating, and monitoring the delivery of individualized services to assist a program participant in overcoming immediate barriers to obtaining housing. Components services and activities consist of:

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

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

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

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

Ineligible and Prohibited Activities

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

§ 576.105 HOUSING RELOCATION AND STABILIZATION SERVICES

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

- (a) **Financial Assistance costs:** Subject to the general conditions under 24 C.F.R. §576.104, ESG funds may pay housing owners, utility companies, and other third parties for the following costs.
- (1) *Rental Application fees:* ESG funds may pay for the rental housing application fee that is charged by the owner to applicants.
 - (2) *Security Deposits:* ESG funds may pay for a security deposit that is equal to no more than two (2) months' rent.
 - (3) *Last month's rent:* If necessary to obtain housing for a program participant, the last month's rent may be paid from HSG-2 funds to the owner of that housing at the time the owner is paid the security deposit and the first month's rent. This assistance must not exceed one months' rent and must be included in calculating the program participant's total rental assistance, which cannot exceed 24 months during any three year period.
 - (4) *Utility deposits.* ESG funds may pay for a standard utility deposit required by the utility company for all customers for the utilities listed in paragraph (5) of this section.
 - (5) *Utility payments.* ESG funds may pay for up to 24 months of utility payments per program participant, per service, including up to 6 months of utility payments in arrears, per service. A partial payment of a utility bill counts as one month. This assistance may only be provided if the program participant or a member of the same household has an account in his or her name with a utility company or proof of responsibility to make utility payments. Eligible utility services are gas, electric, water, and sewage. No program participant shall receive more than 24 months of utility assistance within any 3-year period.
 - (6) *Moving costs.* ESG funds may pay for moving costs, such as truck rental or hiring a moving company. This assistance may include payment of temporary storage fees for up to 3 months, provided that the fees are accrued after the date the program participant begins receiving assistance under paragraph (b) of this section and before the program participant moves into permanent housing. Payment of temporary storage fees in arrears is not eligible.

- (b) Services costs. Subject to the general restrictions under §576.103 and §576.104, ESG funds may be used to pay the costs of providing the following services:
- (1) *Housing search and placement.* Services or activities necessary to assist program participants in locating, obtaining, and retaining suitable permanent housing, include the following:
 - (i) Assessment of housing barriers, needs, and preferences;
 - (ii) Development of an action plan for locating housing;
 - (iii) Housing search;
 - (iv) Outreach to and negotiation with owners;
 - (v) Assistance with submitting rental applications and understanding leases;
 - (vi) Assessment of housing for compliance with Emergency Solutions Grant (ESG) requirements for habitability, lead-based paint, and rent reasonableness;
 - (vii) Assistance with obtaining utilities and making moving arrangements; and
 - (viii) Tenant counseling.
 - 2) *Housing stability case management.* ESG funds may be used to pay cost of assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a program participant who resides in permanent housing or to assist a program participant in overcoming immediate barriers to obtaining housing. 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 consist of:
 - (A) Using the centralized or coordinated assessment system as required under §576.400(d), to evaluate individuals and families applying for or receiving homelessness prevention or rapid re-housing assistance;
 - (B) Conducting the initial evaluation required under §576.401(a), including verifying and documenting eligibility, for individuals and families applying for homelessness prevention or rapid re-housing assistance;
 - (C) Counseling;
 - (D) Developing, securing, and coordinating services and obtaining Federal, State, and local benefits;

- (L) Monitoring and evaluating program participant progress;
 - (F) Providing information and referrals to other providers;
 - (G) Developing an individualized housing and service plan, including planning a path to permanent housing stability; and
 - (H) Conducting re-evaluations required under §576.401(b).
- (3) *Mediation.* ESG funds may pay for mediation between the program participant and the owner or person(s) with whom the program participant is living, provided that the mediation is necessary to prevent the program participant from losing permanent housing in which the program participant currently resides.
- (4) *Legal services.* ESG funds may pay for legal services, as set forth in §576.102(a)(1)(vi), except that the eligible subject matters also include landlord/tenant matters, and the services must be necessary to resolve a legal problem that prohibits the program participant from obtaining permanent housing or will likely result in the program participant losing the permanent housing in which the program participant currently resides.
- (5) *Credit repair.* ESG funds may pay for credit counseling and other services necessary to assist program participants with critical skills related to household budgeting, managing money, accessing a free personal credit report, and resolving personal credit problems. This assistance does not include the payment or modification of a debt.
- (c) *Maximum amounts and periods of assistance.* The recipient may set a maximum dollar amount that a program participant may receive for each type of financial assistance under paragraph (a) of this section. The recipient may also set a maximum period for which a program participant may receive any of the types of assistance or services under this section. However, except for housing stability case management, the total period for which any program participant may receive the services under paragraph (b) of this section must not exceed 24 months during any 3-year period. The limits on the assistance under this section apply to the total assistance an individual receives, either as an individual or as part of a family.
- (d) *Use with other subsidies.* Financial assistance under paragraph (a) of this section cannot be provided to a program participant who is receiving the same type of assistance through other public sources or to a program participant who has been provided with replacement housing payments under the URA, during the period of time covered by the URA payments.

§576.106 SHORT AND MEDIUM TERM RENTAL ASSISTANCE

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

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

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

Homelessness Prevention and Rapid Rehousing

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

Homelessness Prevention Program:

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

Rapid Re-Housing Programs:

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

- (1) For the purpose of this section, medium-term rental assistance is defined as up to 12 months.
 - (2) For FY 2014, monthly rent assistance will be up to \$400 for 1 bedroom; up to \$600 for a 2 bedroom; and up to \$800 for a three bedroom or larger.
 - (3) Program participants must be evaluated for eligibility for medium-term rental assistance after every three 3 months
 - (4) Rapid Re-Housing assistance should be "needs-based," meaning that case manager should determine the amount of assistance based on the minimum amount needed to assist homeless resident secure housing.
 - (5) Case Manager and program participant must developed an agreed-upon case management plan
- (c) *Use with other subsidies.* Except for a one-time payment of rental arrears on the tenant's portion of the rental payment, rental assistance cannot be provided to a program participant who is receiving tenant-based rental assistance, or living in a housing unit receiving project-based rental assistance or operating assistance, through other public sources. Rental assistance may not be provided to a program participant who has been provided with replacement housing payments under the URA during the period of time covered by the URA payments.
- d) *Rent restrictions.* (1) Rental assistance cannot be provided unless the rent does not exceed the Fair Market Rent established by HUD, as provided under 24 CFR part 888, and complies with HUD's standard of rent reasonableness, as established under 24 CFR 982.507.
- (2) For purposes of calculating rent under this section, the rent shall equal the sum of the total monthly rent for the unit, any fees required for occupancy under the lease (other than late fees and pet fees) and, if the tenant pays separately for utilities, the monthly

allowance for utilities (excluding telephone) established by the public housing authority for the area in which the housing is located.

- (c) *Rental assistance agreement.* The recipient or subrecipient may make rental assistance payments only to an owner with whom the recipient or subrecipient has entered into a rental assistance agreement. The rental assistance agreement must set forth the terms under which rental assistance will be provided, including the requirements that apply under this section. The rental assistance agreement must provide that, during the term of the agreement, the owner must give the recipient or subrecipient a copy of any notice to the program participant to vacate the housing unit, or any complaint used under state or local law to commence an eviction action against the program participant.
- (f) *Late payments.* The recipient or subrecipient must make timely payments to each owner in accordance with the rental assistance agreement. The rental assistance agreement must contain the same payment due date, grace period, and late payment penalty requirements as the program participant's lease. The recipient or subrecipient is solely responsible for paying late payment penalties that it incurs with non-LISG funds.
- (g) *Lease.* Each program participant receiving rental assistance must have a legally binding, written lease for the rental unit, unless the assistance is solely for rental arrears. The lease must be between the owner and the program participant. Where the assistance is solely for rental arrears, an oral agreement may be accepted in place of a written lease, if the agreement gives the program participant an enforceable leasehold interest under state law and the agreement and rent owed are sufficiently documented by the owner's financial records, rent ledgers, or canceled checks. For program participants living in housing with project-based rental assistance under paragraph (i) of this section, the lease must have an initial term of one year.
- (h) *Tenant-based rental assistance.* (1) A program participant who receives tenant-based rental assistance may select a housing unit in which to live and may move to another unit or building and continue to receive rental assistance, as long as the program participant continues to meet the program requirements.

(2) The recipient may require that all program participants live within a particular area for the period in which the rental assistance is provided.

(3) The rental assistance agreement with the owner must terminate and no further rental assistance payments under that agreement may be made if:
 - (i) The program participant moves out of the housing unit for which the program participant has a lease; (ii) The lease terminates and is not renewed; or (iii) The program participant becomes ineligible to receive LISG rental assistance.
- (i) *Project-based rental assistance.* If the recipient or subrecipient identifies a permanent housing unit that meets LISG requirements and becomes available before a program participant is identified to lease the unit, the recipient or subrecipient may enter into a

rental assistance agreement with the owner to reserve the unit and subsidize its rent in accordance with the following requirements:

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

HMIS COMPONENT (C.F.R. 24 §576.107)

HMIS Data Collection: Pursuant to 24 CFR §576.107, sub-recipients will operate and administer HMIS as required to implement ESG. For 2015, the City will continue to work with Ramsey County COC and ESG sub-recipients to comply with future HUD guidance relating to HMIS operations. The sub-recipient may use ESG funds to pay the costs of contributing data to HMIS. HMIS costs will be limited to three (3) percent of the grant.

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

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

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

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

(ii) Travel costs incurred for monitoring of subrecipients;

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

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

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

§ 576.109 INDIRECT COSTS.

- (a) *In general.* ESG grant funds may be used to pay indirect costs in accordance with OMB Circular A-87 (2 CFR part 225), or A-122 (2 CFR part 230), as applicable.
- (b) *Allocation.* Indirect costs may be allocated to each eligible activity under §576.101 through §576.108, so long as that allocation is consistent with an indirect cost rate proposal developed in accordance with OMB Circular A-87 (2 CFR part 225), or A-122 (2 CFR part 230), as applicable.

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