

# Saint Louis County

# ACTION PLAN FY 2022

St. Louis County Urban County Entitlement

Community Development Block Grant Program HOME Investment Partnerships Program Emergency Solutions Grant Program

Northeast Minnesota HOME Consortium Cook County Itasca County Koochiching County Lake County St. Louis County

# **Executive Summary**

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

### 1. Introduction

St. Louis County and the Northeast Minnesota HOME Consortium are made up of 150 plus units of local government and unorganized areas across five contiguous counties and covering 16,000 square miles. The city populations in these areas range from a few hundred people to 16,000. Rural areas with lakes experience some density in population while much of the rural area is sparsely populated. The St. Louis County Consolidated Plan (Consolidated Plan) attempts to provide a vision of the community needs and priorities across this diverse region. The Consolidated Plan is an application and strategy statement to the U.S. Department of Housing and Urban Development (HUD) addressing housing and community development needs for program years 2020-2024. The 2020-2024 Consolidated Plan is a combination housing plan, community development plan and application for the following three U.S. Department of Housing and Urban Development statement to the following three U.S. Department of Housing and application for the following three U.S. Department of Housing and application for the following three U.S. Department of Housing and application for the following three U.S. Department of Housing and Plan and application for the following three U.S. Department of Housing and Urban Development programs:

- Community Development Block Grant (CDBG)
- Home Investment Partnerships (HOME)
- Emergency Solutions Grant (ESG)

The FY 2022 Action Plan is a statement of how the County intends to spend its HUD entitlement funds in the areas of housing and community development over the 2022 program year. The annual program year for Consolidated Plan purposes runs from May 1 – April 30.

The area served under the St. Louis County CDBG and ESG programs is all of St. Louis County excluding the City of Duluth. Duluth receives separate entitlement allocations from HUD. The HOME program serves the Northeast Minnesota HOME Consortium which is composed of the five counties of Cook, Itasca, Koochiching, Lake, and St. Louis (excluding Duluth). The four counties outside of St. Louis County are not HUD entitlement grantees and do not include within them cities that are HUD entitlement grantees.

St. Louis County developed the 2022 Action Plan during the ongoing COVID-19 global pandemic and its response. During 2020, the County received CDBG-CV and ESG-CV funding made available through the CARES Act and funded activities in support of activities described in the 2022 Action Plan. St. Louis County continues to seek input from affected residents, communities, and agencies to utilize funding with the flexibility needed to benefit those impacted.

### 2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

St. Louis County's primary **objectives** to address the priority needs of citizens are as follows:

- Create viable communities through infrastructure and accessibility improvements, and provision of community services.
- Preserve and expand the supply of decent, affordable rental and owner-occupied housing through rehabilitation, development, home buyer assistance, and homeless/special needs housing support.
- Expand economic opportunities through increased employment opportunities and an increased tax base

**Outcomes** are designed to capture the nature of the change or the expected result of the activity. HUD's outcome performance measures are framed in three categories:

- Availability/Accessibility: Applies to activities that make services, infrastructure, public services, public facilities, housing or shelter available or accessible to low- and moderate-income people, including persons with a disabilities or mobility impairment.
- **Affordability**: Applies to activities that provide affordability in a variety of ways to low- and moderate-income people. It can include the creation or maintenance of affordable housing, basic infrastructure, or services.
- **Sustainability**: Applies to activities that are aimed at improving communities or neighborhoods, helping make them livable or viable by providing benefit to low- and moderate-income persons or by removing or eliminating slums or blighted areas, through a range of activities or services.

### 3. Evaluation of past performance

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

The St. Louis County programs are designed to meet our objectives, and focus on improving the lives of low-moderate income citizens. Accomplishments during the past four years include the following:

- Assisted 231 families to become first time home buyers by providing counseling, education, access to low-interest mortgage products and down payment assistance
- Maintained existing housing stock by providing loans and grants to 24 low-moderate income families
- Assisted with the rehabilitation of 0 affordable rental units

- Expanded economic opportunities through technical assistance and training to 25 LMI microenterprise business owners
- Improved communities by removing blighted property, improving public infrastructure and removing physical barriers to public facilities
- Provided services to low- and moderate-income persons which improve their quality of life, promote self-sufficiency, and reduce homelessness

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

Summary from citizen participation section of plan.

To broaden public participation and create greater accessibility for public input, St. Louis County requested citizen participation through multiple forms. Citizens were engaged by means of:

- Public hearings for
- Open houses to present program information and answer questions from potential applicants
- Individual meetings with local community leaders from varying sized communities
- Attendance at regional housing, economic development, homelessness, and human service provider group meetings
- Focus groups facilitated to gather Fair Housing information
- Online survey tools distributed by email, County web site positing, and news release through multiple local print media providers

Email distribution through govDelivery, an electronic citizen engagement technology used by St. Louis County that allows posting to social media, text message, and email simultaneously.

St. Louis County understands the need of its citizens for strong broadband service. Consultation with stakeholders such as Blandin Foundation, Department of Iron Range Resources and Rehabilitation, Range Associations of Municipalities and Schools, NESC, service providers, and cities and townships have taken place and will continue as the County supports the expansion of broadband fiber. The County has dedicated a staff member to work on broadband efforts and obtain support. See AP10 for specifics regarding consultation outreach.

Broadband is a hot topic in all area communities. As more and more aspects of our daily lives become dependent on internet connections, the importance and need for having a good connection will continue increase. One of the area's leading proponents for broadband is Blandin Paper Company. The Blandin Foundation has invested millions of dollars into the education and expansion of broadband in Northern Minnesota. Blandin conducts an annual survey of households that are either served, under served, or not served by a broadband provider. Both Cook and Lake Counties have greater than 90% of their households served with 100/20 speed broadband and are considered in good shape. Itasca and Koochiching Counties have between 73% and 79% of their households served and are considered a

warning area. St. Louis County has 41% of households served and are considered a high need area. The biggest area of need between all counties are rural areas. The cost for providers to put in the infrastructure to serve these areas is not beneficial to them as the customers are more spread out. The return on investment is poor. Over the past 10 years, there has been millions of dollars given to providers in these areas to get them to expand, but that has only scratched the surface.

### 5. Summary of public comments

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

No public comments were received outside of the citizen participation process.

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

Not applicable. No public comments were received outside of the citizen participation process.

### 7. Summary

Significant efforts were undertaken to obtain public input detailed in question 4 above. St. Louis County utilized this public input to identify priority needs to be addressed with CDBG, HOME, and ESG funding. The objectives and goals within the plan address needs identified by the public. St. Louis County will continue to obtain public input annually to assure projects and activities receiving entitlement funding address community needs.

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

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

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. LC		DUIS COUNTY Planning and Community Developm		Community Development Department
HOME Administrator	ST. LC	ST. LOUIS COUNTY		Community Development Department
ESG Administrator ST. LO		JIS COUNTY Planning and Community Development		Community Development Department

Table 1 – Responsible Agencies

#### Narrative

The St. Louis County Planning and Community Development Department has responsibility for administration of the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), and Emergency Solutions Grant (ESG) Programs on behalf of St. Louis County and the Northeast Minnesota HOME Consortium.

The following definitions will apply when referring to the various jurisdictional geographic areas covered by the Consolidated Plan:

- County: St. Louis County, excluding Duluth.
- Consortium: Counties of Cook, Itasca, Koochiching, Lake, and St. Louis, excluding Duluth.

#### **Consolidated Plan Public Contact Information**

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# AP-10 Consultation - 91.100, 91.200(b), 91.215(l)

### 1. Introduction

St. Louis County strives to provide a coordinated approach to planning among the various jurisdictions, service providers, and other partners in the County and Consortium. Planning and Community Development staff members are actively involved in regional housing and human service groups and regularly interact with local units of government and nonprofit agencies providing funded services.

# 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)).

St. Louis County actively promotes cooperation and coordination between the public sector and the nonprofit sector to address housing issues throughout the county. Interdepartmental discussion with the County Public Health and Human Services Department (PHHS) focuses on reducing public health costs for the homeless, chemically dependent, and mentally ill through provision of housing options. Providing housing stability is a critical component to PHHS Department goals of self-sufficiency for clients. Planning and Community Development staff persons participate in groups that bridge gaps between social service programs and community providers of housing and supportive services.

To further enhance this bridge, the Planning and Community Development Department maintains contact with the Rural St. Louis County Housing Coalition, St. Louis County Continuum of Care Advisory Committee, Northeast Minnesota HOME Consortium, and the Northeast Minnesota Continuum of Care. These groups provide venues for information exchange, issue advocacy, and cooperative development of solutions to community and resident needs.

# 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 St. Louis County Continuum of Care (CoC) is facilitated by the Public Health and Human Services Department and the HUD entitlement programs are administered by the Planning and Community Development Department. Staff members of each department including supervisory staff exchange program information and work together on the initiatives identified in the County Plan to End Homelessness. CDBG and ESG funding recommendations are also reviewed by the CoC Advisory Committee.

# Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate

# outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

The ESG entitlement is received for St. Louis County only and excludes Duluth. ESG policy, standards, evaluation, and funding recommendations are reviewed through the St. Louis County Continuum of Care process. That process begins with review by the Rural Housing Coalition (RHC). The RHC is open to attendance by any agency or individual in the County. The majority of attendees represent agencies providing housing, housing services, mental health services, disability services, and local and county government departments.

The RHC recommendations are forwarded to the Continuum of Care Advisory Committee. The CoC Advisory Committee is made up of individuals appointed by the Duluth City Council or St. Louis County Board. Appointees represent community groups, physical health and mental health providers, housing and homeless provider agencies, homeless or formerly homeless persons, and the city and county. ESG funding recommendations require formal approval by the St. Louis County Board.

# 2. Agencies, groups, organizations and others who participated in the process and consultations

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	MINNESOTA HOUSING FINANCE AGENCY		
	Agency/Group/Organization Type	Other government - State		
	What section of the Plan was addressed by	Housing Need Assessment		
	Consultation?	Homeless Needs - Chronically homeless		
		Homeless Needs - Families with children		
		Homelessness Needs - Unaccompanied youth		
		Homelessness Strategy		
		Market Analysis		
	Briefly describe how the Agency/Group/Organization was consulted. What	The Minnesota Housing Finance Agency creates annual community profiles that display demographic, financial, and rental and home owner housing market		
	are the anticipated outcomes of the consultation or	information. The agency also provides funding for home ownership and rental		
	areas for improved coordination?	housing development and rehabilitation. Community Development interacts with MN Housing through mutually funded activities and program training. This information and exchange aids alignment of St. Louis County and HOME Consortium Programs with Minnesota Housing resources.		
2	Agency/Group/Organization	USDA-Rural Development		
	Agency/Group/Organization Type	Other government - Federal		
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Mortgage Financing		
	Briefly describe how the	St. Louis County regularly interacts with Rural Development through mutual		
	Agency/Group/Organization was consulted. What	home ownership assistance programs. Rural Development is a frequent provider		
	are the anticipated outcomes of the consultation or	of the first mortgage on activities assisted with the Consortium Home Ownership		
	areas for improved coordination?	Assistance Program (down payment and closing costs). County, AEOA, and		
		KOOTASCA staff work together by phone and email to assist clients and ensure		
		respective programs remain complementary to each other.		

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3	Agency/Group/Organization	MN Dept of Iron Range Resources & Rehabilitation		
	Agency/Group/Organization Type	Other government - State Regional organization		
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development Broadband		
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Minnesota Department of Iron Range Resources and Rehabilitation (IRRR) provides funding to communities and agencies for infrastructure and community facilities. St. Louis County and IRRR staff persons work cooperatively on jointly funded projects and promote inter-agency cooperation within the region.		
4	Agency/Group/Organization	DULUTH		
	Agency/Group/Organization Type	Other government - Local		
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Economic Development		
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City of Duluth and St. Louis County are in regular contact to plan, coordinate, and deliver homelessness housing and services through the local Continuum of Care. The City and County are also separate HUD entitlement jurisdictions with community development staff that share experience and expertise with HUD- funded programs.		

5	Agency/Group/Organization	Iron Range Economic Alliance (IREA)		
	Agency/Group/Organization Type	Regional organization Business and Civic LeadersHousing Need Assessment Economic DevelopmentThe Iron Range Economic Alliance (IREA) meets quarterly to discuss economic trends and potential development responses. The alliance includes economic development professionals, local government officials, nonprofit agencies, consultants, and business leaders. Meetings are a forum for information exchange and building of networking contacts. A Community Development staff person attends IREA meetings.		
	What section of the Plan was addressed by Consultation?			
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?			
6	Agency/Group/Organization	HOME Consortium Advisory Committee		
	Agency/Group/Organization Type	Housing Regional organization		
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis		
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Northeast MN HOME Consortium Advisory Committee is made up of a Commissioner from the counties of Cook, Itasca, Koochiching, Lake, and St. Louis along with a housing advocate from each of these counties. Committee meetings include housing assessment for each county, prioritization of needs, review of available funding and other resources, and funding award. The diversity of the group members provides strong community-based information to the process. The Committee meets twice a year.		

Agency/Group/Organization	Arrowhead Economic Opportunity Agency
Agency/Group/Organization Type	Housing
	Services - Housing
	Services-Children
	Services-Elderly Persons
	Services-homeless
	Services-Employment
	Regional organization
	Planning organization
What section of the Plan was addressed by	Housing Need Assessment
Consultation?	Homeless Needs - Chronically homeless
	Homeless Needs - Families with children
	Homelessness Needs - Unaccompanied youth
	Homelessness Strategy
	Market Analysis
	Anti-poverty Strategy
	Lead-based Paint Strategy
Briefly describe how the	AEOA is a community action agency covering seven counties in northeastern
Agency/Group/Organization was consulted. What	Minnesota. The agency delivers housing programs and homelessness services
are the anticipated outcomes of the consultation or	funded by St. Louis County. Agency staff members also participate in regional
areas for improved coordination?	planning efforts, including the St. Louis County and Northeast MN Continuums of
	Care. AEOA additionally provides planning services to local communities and
	agencies. AEOA conducts periodic community needs assessments for its service
	area that provide valuable input to the Consolidated Planning process.

8	Agency/Group/Organization	KOOTASCA COMMUNITY ACTION, INC.				
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	Agency/Group/Organization Type	Housing				
		Services - Housing				
		Services-Children				
		Services-Elderly Persons				
		Services-homeless				
		Regional organization				
		Planning organization				
	What section of the Plan was addressed by	Housing Need Assessment				
	Consultation?	Homeless Needs - Chronically homeless				
		Homeless Needs - Families with children				
		Homelessness Needs - Unaccompanied youth				
		Homelessness Strategy				
		Market Analysis				
		Lead-based Paint Strategy				
	Briefly describe how the	KOOTASCA is a community action agency covering two counties in northeastern				
	Agency/Group/Organization was consulted. What	Minnesota. The agency delivers housing programs and homelessness services				
	are the anticipated outcomes of the consultation or	funded by St. Louis County. Agency staff members also participate in regional				
	areas for improved coordination?	planning efforts, including the Northeast MN Continuum of Care. KOOTASCA				
		additionally provides planning services to local communities and agencies.				
		KOOTASCA conducts periodic community needs assessments for its service area				
		that provide valuable input to the Consolidated Planning process.				
9	Agency/Group/Organization	ONE ROOF COMMUNITY HOUSING/NORTHERN COMMUNITIES LAND TRUST				
	Agency/Group/Organization Type	Housing				
		Neighborhood Organization				
	What section of the Plan was addressed by	Housing Need Assessment				
	Consultation?	Market Analysis				
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	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	One Roof Community Housing develops owner-occupied and multifamily housing in the counties of St. Louis, Cook, and Lake. Their staff provide input to the demand for housing and the financial climate for development. One Roof is a land trust and an approved CHDO for the HOME Consortium.
10	Agency/Group/Organization	Blandin Foundation
	Agency/Group/Organization Type	Regional organization Foundation
	What section of the Plan was addressed by Consultation?	Broadband
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Blandin Foundation conducts an annual survey of households that are either served, under served or not served by a broadband provider and makes this information available for public use. St. Louis County works directly with and provides funding to the Foundation through its Bland Broadband Communities project.
11	Agency/Group/Organization	Northeast Service Cooperative (NESC)
	Agency/Group/Organization Type	Services-Education Internet service provider consultation
	What section of the Plan was addressed by Consultation?	Broadband
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Northeast Service Cooperative (NESC) created the Northeast Fiber Network spanning eight counties in northeast Minnesota designed to providebroadband to underserved and unserved areas. The project received \$45.3 million dollars in federal funding and extends 865 miles across the region. The NESC provides information about Internet service provider expansion and coverage in the region. Consultation with NESC and review of its fiber mapping project provided input to the Consolidated Plan.

12	Agency/Group/Organization	Range Association of Municipalities and Schools (RAMS)		
	Agency/Group/Organization Type	Regional organization		
	What section of the Plan was addressed by Consultation?	Broadband		
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Range Association of Municipalities and Schools (RAMS) is a non-profit organization formed to represent communities and schools across the Iron Range. RAMS recently created a crowdsourcing project covering multiple counties to gather broadband speed data. This data is critical to broadband expansion in rural areas and especially for identification of unserved or underserved areas. St. Louis County is supporting and participating in this project.		
13	Agency/Group/Organization	North SLC Soil and Water Conservation District		
	Agency/Group/Organization Type	Agency - Managing Flood Prone Areas Agency - Management of Public Land or Water Resources		
	What section of the Plan was addressed by Consultation?	Water and soil resource management - flood prone areas		
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The St. Louis County Planning Department includes the Land Use and Community Development Divisions. The Land Use Division issues land use permits for areas within the County. Permit issuance is coordinated with The North SLC Soil and Water Conservation District (SWCD) to assure permitted land use is compliant with water planning efforts, surface and ground water quality preservation, water runoff issues, and aquatic invasive species management. St. Louis County also provides funding to the SWCD. Community Development, Land Use, and SWCD staff persons share Divisional updates to these issues.		

14	Agency/Group/Organization	SLC Planning - Land Use Division
	Agency/Group/Organization Type	Other government - County Grantee Department
	What section of the Plan was addressed by Consultation?	Public land management, water resources, flood prone areas
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The St. Louis County Planning Department is made up of multiples divisions including Land Use and Community Development. The Land Use Division as its name implies issues permits for buildings and use of real property. Community Development and Land Use staff persons share office space and expertise through periodic staff meetings.
15	Agency/Group/Organization	SLC Sheriff Department
	Agency/Group/Organization Type	Agency - Emergency Management Grantee Department
	What section of the Plan was addressed by Consultation?	Emergency Management
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The St. Louis County Sheriff Department also includes the St. Louis County Rescue Squad. The Sheriff Department has responsibility for emergency management throughout St. Louis County and maintains mobile command station trailers in north and south St. Louis County. The Rescue Squad includes vehicles, equipment, and highly trained volunteers for use in search and rescue on land and water.

Identify any Agency Types not consulted and provide rationale for not consulting

No agency types were excluded from the consultation 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?
	St. Louis County Public	Priorities of the Continuum of Care are shared with the advisory committees for the CDBG
Continuum of Care	Health and Human	and HOME programs. The ESG funding recommendations are reviewed through the CoC
	Services	process.
Continuum of	Nouth cost Minnesste CoC	Priorities of the Continuum of Care are shared with the advisory committee for the HOME
Continuum of	of Northeast Minnesota CoC Plan	program. The NE Minnesota Continuum includes the four additional counties in the HOME
Care-2		Consortium - Cook, Itasca, Koochiching, and Lake.

Table 3 – Other local / regional / federal planning efforts

#### Narrative

No further discussion.

# AP-12 Participation - 91.401, 91.105, 91.200(c)

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

The St. Louis County Citizen Participation Plan sets the foundation to develop stronger relationships with citizens. St. Louis County supports and encourages the participation of citizens, community groups, and interested agencies in both the development and evaluation of programs and activities included in the Consolidated Plan. Increasing citizen and community involvement is important to gain a better understanding of the needs in the county and to develop effective strategies to address those needs. The Citizen Participation Plan sets forth a process to be followed at both the community and county levels.

Currently, there are three advisory committees involved in the Consolidated Plan process:

- The St. Louis County Board of Commissioners appoints a 19-member CDBG Citizen Advisory Committee. Members are selected to provide a fair and balanced representation of county citizens and their interests. The committee's primary responsibility is to recommend the annual distribution of CDBG project funds to the County Board. The committee bases its recommendation on community needs identified in the application process and objectives identified in the Consolidated Plan. There are typically three public meetings for applicant presentations and interviews and one public meeting to set the funding recommendation.
- The HOME program has a 10-member advisory committee made up of one county commissioner and one housing advocate from each participating county. The committee meets twice each year to gain a better understanding of the housing needs in the Consortium, develop effective strategies to address those needs within regulatory guidelines, and to make recommendations to the St. Louis County Board on the use of HOME funds.
- The St. Louis County Rural Housing Coalition (RHC) serves as the advisory committee for the ESG program. The RHC is open to attendance by any agency or individual in the County. The majority of attendees represent agencies providing housing, housing services, mental health services, disability services, and local and county government departments. The RHC meets monthly to discuss concerns related to homelessness and to develop effective strategies to address those concerns. RHC recommendations are carried forward to the Continuum of Care-Heading Home Advisory Committee which makes recommendations to the County Board on the proposed use of ESG funds.

The County and Consortium also used newspaper publication, news releases, Social Media, County website posting, and email groups to conduct outreach and allow greater citizen input to the process.

# **Citizen Participation Outreach**

Sort Or der	Mode of Ou treach	Target of Ou treach	Summary of response/atte ndance	Summary of comments re ceived	Summary of co mments not accepted and reasons	URL (If applica ble)
1	Public Hearing	Non- targeted/bro ad community	6/8/2022 legal notice of public meeting to announce the 2022 funding cycle for the CDBG, HOME, and ESG Programs.	No comments received - legal notice	Not applicable	

2	Public Hearing	Non- targeted/bro ad community	The County's annual CDBG application process began with a public hearing conducted with virtual technology due to the COVID-19 pandemic. The meeting included discussion of previous year accomplishme nts, current year application information, and dialog with attendees about housing, economic development, infrastructure, and public service needs in their communities. The meeting was conducted on 7/12/2022.	Needs voicedfrom meetingparticipantsinclude:affordablerental andowner-occupiedhousing (fewunits areavailable andthose on themarket are inpoorconditionand oftenover-priced),aging utilitiesneedreplacement(water,sewer, stormwater andstreets aswell astreatmentfacilities),communitycenter rehaband newconstruction,Internetaccess andimprovedspeed forrural areas,expandedpublicservices-homelessshelter and	All comments were accepted.	
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Sort Or der	Mode of Ou treach	Target of Ou treach	Summary of response/atte ndance	Summary of comments re ceived	Summary of co mments not accepted and reasons	URL (If applica ble)
				food programs.		
3	Newspaper Ad	Non- targeted/bro ad community	12/8/2021 public notice of the meeting schedule and use of virtual technology to conduct the meetings was published in the Duluth News Tribune. The notice included a link to the St. Louis County website for meeting access.	No comments - public notice	No comments - public notice	

Sort Or der	Mode of Ou treach	Target of Ou treach	Summary of response/atte ndance	Summary of comments re ceived	Summary of co mments not accepted and reasons	URL (If applica ble)
4	Public Meeting	Non- targeted/bro ad community	1/5, 1/12, 1/13, and 1/20/2022 presentation and selection process for all CDBG applications to be considered for the FY 2022 funding competition. Attendees include CDBG Advisory Committee representative s, applicants, and persons from the general public. Meetings were conducted virtually with public access web links posted to the St. Louis County website and sent by email upon request.	Support for or questions of priority of the applications received. These comments are considered by the Advisory Committee in making its funding recommenda tions to the St. Louis County Board.	All comments were accepted.	

Sort Or der	Mode of Ou treach	Target of Ou treach	Summary of response/atte ndance	Summary of comments re ceived	Summary of co mments not accepted and reasons	URL (If applica ble)
5	Newspaper Ad	Non- targeted/bro ad community	Notification of the 30-day comment period for the FY 2022 Action Plan. The comment period ran from 6/10 - 7/10/2022.	None	All comments were accepted.	

Sort Or der	Mode of Ou treach	Target of Ou treach	Summary of response/atte ndance	Summary of comments re ceived	Summary of co mments not accepted and reasons	URL (If applica ble)
6	Public Meeting	Non- targeted/bro ad community affordable housing needs and priorities	2/25/2022 HOME Consortium Advisory Committee. The ten- member committee is made up of a Commissioner from each of the 5 Consortium counties and a housing advocate from each county. The committee reviews applications for HOME funding and creates its recommendati on to the St. Louis County Board.	Discussion of housing needs, differences between areas of each county, and priorities for equitable use of HOME funding in the region.	All comments were accepted.	

Sort Or der	Mode of Ou treach	Target of Ou treach	Summary of response/atte ndance	Summary of comments re ceived	Summary of co mments not accepted and reasons	URL (If applica ble)
7	Public Meeting	Non- targeted/bro ad community homelessnes s response	Rural Housing Coalition (RHC) meetings. The RHC is made up of agencies, individuals, and the general public connected to the Continuum of Care for St. Louis County.	3/3/2022: Announce request for ESG applications and receive input to the need and priorities for the use of ESG funding. 4/7/2022: application review and funding recommenda tion to the St. Louis County Board.	All comments accepted.	
8	Public Hearing	Non- targeted/bro ad community	7/12/2022 St. Louis County Board public hearing on the 2022 Action Plan. County Board meetings are open to the general public.	Discussion by Commissione rs of the projects/activ ities funded and opportunity for the public to comment.	All comments were accepted.	

Table 4 – Citizen Participation Outreach

# **Expected Resources**

# AP-15 Expected Resources - 91.420(b), 91.220(c)(1,2)

#### Introduction

The year expected amounts are based upon notification of actual HUD-CPD awards.

### **Anticipated Resources**

Program	Source	Uses of Funds	Expe	ected Amou	nt Available Ye	ear 1	Expected	Narrative Description
	of Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$	
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	2,011,928	30,000	0	2,041,928	5,925,000	

Program	Source	Uses of Funds	Expe	cted Amou	nt Available Ye	ear 1	Expected	Narrative Description
of Func			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$	
HOME	public -	Acquisition						
	federal	Homebuyer						
		assistance						
		Homeowner rehab						
		Multifamily rental						
		new construction						
		Multifamily rental						
		rehab						
		New construction						
		for ownership						
		TBRA	563,569	30,000	0	593 <i>,</i> 569	1,680,000	
ESG	public -	Conversion and						
	federal	rehab for						
		transitional						
		housing						
		Financial						
		Assistance						
		Overnight shelter						
		Rapid re-housing						
		(rental assistance)						
		Rental Assistance						
		Services						
		Transitional						
		housing	168,854	0	0	168,854	495,000	

Program	Source	Uses of Funds	Expe	cted Amour	nt Available Yo	ear 1	Expected	Narrative Description
	of Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$	
Other	public -	Admin and						SLC has received notice of an
	federal	Planning						additional funding from the
		Conversion and						American Rescue Plan Act. SLC staff
		rehab for						are currently working through the
		transitional						Allocation Plan to submit to HUD
		housing						for approval.
		Financial						
		Assistance						
		Overnight shelter						
		Public Services						
		Rapid re-housing						
		(rental assistance)						
		Rental Assistance						
		Services						
		TBRA	2,042,540	0	0	2,042,540	2,042,540	
Other	public -	Other						
	federal		0	0	0	0	0	

Table 2 - 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

CDBG, HOME, and ESG funding has historically leveraged in excess of \$4 for every entitlement dollar. Projects listed in the Action Plan include match and leverage sources.

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

No publically owned land or property is anticipated to be used for projects in the 2022 Action Plan.

#### Discussion

No further discussion.

# Annual Goals and Objectives

# AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

### **Goals Summary Information**

Sort	Goal Name	Start	End	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
Order		Year	Year					
1	Housing: Home	2020	2024	Affordable	St. Louis County	Affordable		Public service activities for
	Ownership			Housing	and the NE	Housing		Low/Moderate Income
	Education				Minnesota HOME			Housing Benefit: 185
					Consortium			Households Assisted
2	Housing: Owner and	2020	2024	Affordable	St. Louis County	Affordable	CDBG:	Homeowner Housing
	<b>Renter Housing</b>			Housing	and the NE	Housing	\$25,000	Added: 5 Household
	Development				Minnesota HOME		HOME:	Housing Unit
					Consortium		\$421,657	
3	Housing: Home	2020	2024	Affordable	St. Louis County	Affordable	HOME:	Direct Financial Assistance
	Ownership			Housing	and the NE	Housing	\$305,000	to Homebuyers: 60
	Assistance Program				Minnesota HOME			Households Assisted
					Consortium			
4	Housing: Owner-	2020	2024	Affordable	St. Louis County	Affordable	CDBG:	Homeowner Housing
	Occupied and Rental			Housing	and the NE	Housing	\$220,000	Rehabilitated: 25 Household
	Rehabilitation				Minnesota HOME			Housing Unit
					Consortium			

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Public Services	2020	2024	Homeless	St. Louis County	Public Services	CDBG:	Public Facility or
				Non-Homeless	and the NE		\$260,000	Infrastructure Activities
				Special Needs	Minnesota HOME		ESG:	other than Low/Moderate
					Consortium		\$169,123	Income Housing Benefit:
								29985 Persons Assisted
								Public service activities
								other than Low/Moderate
								Income Housing Benefit: 30
								Persons Assisted
								Homeless Person Overnight
								Shelter: 145 Persons
								Assisted
								Homelessness Prevention:
								150 Persons Assisted
6	Public	2020	2024	Non-Housing	St. Louis County	Community	CDBG:	Public Facility or
	Infrastructure:			Community	and the NE	Facilities and	\$1,052,000	Infrastructure Activities
	Improvements			Development	Minnesota HOME	Public		other than Low/Moderate
					Consortium	Infrastructure		Income Housing Benefit:
								9254 Persons Assisted
7	Community	2020	2024	Non-Housing	St. Louis County	Community	CDBG:	Other: 1 Other
	Facilities:			Community	and the NE	Facilities and	\$50,000	
	Accessibility			Development	Minnesota HOME	Public		
					Consortium	Infrastructure		
8	Community	2020	2024	Non-Housing	St. Louis County	Community	CDBG:	Other: 1 Other
	Facilities:			Community	and the NE	Facilities and	\$48,000	
	Improvements			Development	Minnesota HOME	Public		
					Consortium	Infrastructure		

Sort	Goal Name	Start	End	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
Order		Year	Year					
9	Economic	2020	2024	Non-Housing	St. Louis County	Economic	CDBG:	Public service activities
	Development:			Community	and the NE	Development	\$20,000	other than Low/Moderate
	Microenterprise			Development	Minnesota HOME			Income Housing Benefit: 10
	Assistance				Consortium			Persons Assisted
10	Economic	2020	2024	Non-Housing	St. Louis County	Economic	CDBG:	Public service activities
	Development:			Community	and the NE	Development	\$20,000	other than Low/Moderate
	Career Development			Development	Minnesota HOME			Income Housing Benefit: 25
					Consortium			Persons Assisted

Table 3 – Goals Summary

## **Goal Descriptions**

1	Goal Name	Housing: Home Ownership Education
	Goal Description	St. Louis County does not provide funding to Home Ownership Education but requires it as a pre-requisite to its Home Ownership Assistance Program. Because of this connection, the County tracks the number of persons participating in the education component.
2	Goal Name	Housing: Owner and Renter Housing Development
	Goal Description	
3	Goal Name	Housing: Home Ownership Assistance Program
	Goal Description	

4	Goal Name	Housing: Owner-Occupied and Rental Rehabilitation
	Goal Description	
5	Goal Name	Public Services
	Goal Description	The ESG amount listed below includes both the funded activities and the eligible 7.5% in administrative funding for St. Louis County.
6	Goal Name	Public Infrastructure: Improvements
	Goal Description	
7	Goal Name	Community Facilities: Accessibility
	Goal Description	
8	Goal Name	Community Facilities: Improvements
	Goal Description	
9	Goal Name	Economic Development: Microenterprise Assistance
	Goal Description	
10	Goal Name	Economic Development: Career Development
	Goal Description	

## AP-35 Projects - 91.420, 91.220(d)

#### Introduction

Year 3 of the 2020-2024 St. Louis County Consolidated Plan. While COVID-19 impacted the separate CDBG, ESG, and HOME processes, they still included application solicitation, applicant presentations, advisory committee reviews and recommendations, public comment and public hearing opportunities, and approval by the St. Louis County Board of Commissioners.

#	Project Name
1	Access North - Aging in Place
2	AEOA-Single Family Rehabilitation Loan Program
3	Chisholm HRA - Maple View Rehabilitation
4	Cook HRA - Homestead Apartments Rehabilitation
5	Eveleth HRA - Hilltop Homes Rehabilitation
6	North St Louis County Habitat for Humanity - Habitat Building Program
7	Northeast Entrepreneur Fund - Microenterprise Business Assistance
8	SOAR Career Solutions
9	City of Buhl - Buhl/Kinney Senior Center Improvements
10	City of Gilbert - Community Center Accessibility Improvements - Phase II
11	City of Aurora - Water Treatment Facility Construction
12	Township of Breitung - Infrastructure
13	City of Ely - Wastewater Treatment Facility Improvements
14	City of Eveleth - Infrastructure
15	City of Floodwood - Infrastructure
16	City of Hibbing - Infrastructure
17	Hibbing Public Utilities Commission - Infrastructure
18	City of Orr - Infrastructure
19	City of Virginia - Infrastructure
20	City of Winton - Infrastructure
21	Advocates for Family Peace - Children's Program
22	Arrowhead Economic Opportunity Agency - Homeless Shelter Operations
23	Arrowhead Economic Opportunity Agency - Homeless Youth Services
24	Legal Aid Service of NE Minnesota - Housing Counseling, Information & Litigation Project
25	Project Care Free Clinic - Clinic Operations
26	Quad City Food Shelf - AEOA - Food Shelf Operations
27	Range Transitional Housing - Transitional & Permanent Housing Program
28	The Salvation Army - Hibbing - Melting Pot Meals Program

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#	Project Name
29	The Salvation Army - Virginia - Virginia Supper Club
30	Sexual Assault Program of Northern St Louis County - Youth Outreach Services
31	United Way of Northeastern MN - Buddy Backpacks Program
32	St Louis County - General Administration
33	HOME: CHDO Set Aside
34	HOME: Home Ownership Assistance Program (HOAP)
35	HOME: Program Administration
36	HOME: Housing Development Fund
37	ESG2022 ST. LOUIS COUNTY

Table 4 – Project Information

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

The individual Advisory Committees for the CDBG, HOME, and ESG Programs annually review applications and determine allocation amounts based upon priorities established in the Consolidated Plan, project readiness, budget reasonableness, community or agency capacity, and other factors. The primary obstacle to addressing underserved needs is limited funding.

## **AP-38 Project Summary**

**Project Summary Information** 

1	Project Name	Access North - Aging in Place
	Target Area	
	Goals Supported	Housing: Owner-Occupied and Rental Rehabilitation
	Needs Addressed	Affordable Housing
	Funding	:
	Description	Access North employees and local volunteers construct and install ramp modules throughout St. Louis County for persons with a physical disability or mobility impairment . CDBG funding is used to purchase green treated lumber for construction of home access ramps and the purchase of Rolla Ramp material. Rolla Ramp is aluminum modular components used to provide temporary ramps to clients on the agency waiting list.
	Target Date	10/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	10 families with a physical disability or mobility impairment.
	Location Description	Access North: 1309 E 40th Street, Hibbing, MN 55746 â¿Â2 serves clients countyâ¿Â2wide.
	Planned Activities	Access North employees and local volunteers construct and install ramp modules throughout St. Louis County for persons with a physical disability or mobility impairment . CDBG funding is used to purchase green treated lumber for construction of home access ramps and the purchase of Rolla Ramp material. Rolla Ramp is aluminum modular components used to provide temporary ramps to clients on the agency waiting list.
2	Project Name	AEOA-Single Family Rehabilitation Loan Program
	Target Area	
	Goals Supported	Housing: Owner-Occupied and Rental Rehabilitation
	Needs Addressed	Affordable Housing
	Funding	:

	Description Target Date	County-wide program assists home owners with energy improvements and rehabilitation of heating, electrical, plumbing, and structural systems. Funding is provided as a 10-year, deferred loan. Comprehensive rehabilitation results through leveraging funds from state and federal programs AEOA administrates. A component of the program also provides small grants for maintenance repair items. 10/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	15 low-income families
	Location Description	Community Wide Activity: Contact AEOA, 702 3rd Avenue South, Virginia, MN 55792
	Planned Activities	Countyâ¿ wide program assists home owners with energy improvements and rehabilitation of heating, electrical, plumbing, and structural systems. Funding is provided as a 10â¿ year, deferred loan. Comprehensive rehabilitation results through leveraging funds from state and federal programs AEOA administrates. A component of the program also provides smaller grants for maintenance repair items.
3	Project Name	Chisholm HRA - Maple View Rehabilitation
	Target Area	
	Goals Supported	Housing: Owner-Occupied and Rental Rehabilitation
	Needs Addressed	Affordable Housing
	Funding	:
	Description	Rehabilitation of 8 units within the Mapleview public housing project. Project activities include asbestos abatement, individual unit reconstruction, air-handling/ventilation improvements, and roofing replacement. The units have been vacant and unable to rent until these improvement are completed.
	Target Date	10/31/2023

	Estimate the number and type of families that will benefit from the proposed activities Location Description Planned Activities	8 housing units Maple View Apartments: 429 A-H SW 2nd St, Chisholm, MN 55719 Rehabilitation of 8 units within the Mapleview public housing project. Project activities include asbestos abatement, individual unit reconstruction, air-handling/ventilation improvements, and roofing
4		replacement. The units have been vacant and unable to rent until these improvement are completed.
-	Project Name	Cook HRA - Homestead Apartments Rehabilitation
	Target Area	
	Goals Supported	Housing: Owner-Occupied and Rental Rehabilitation
	Needs Addressed	Affordable Housing
	Funding	:
	Description	Rehabilitation of public housing units. Flooring replacement to the community areas of the Homestead Apartment building that contains 24 units. Project will replace deteriorated carpet and tile in these areas.
	Target Date	10/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	24 housing units
	Location Description	Homestead Apartments - 111 SE 5th Street, Cook, MN 55723
	Planned Activities	Rehabilitation of public housing units. Flooring replacement to the community areas of the Homestead Apartment building that contains 24 units. Project will replace deteriorated carpet and tile in these areas.
5	Project Name	Eveleth HRA - Hilltop Homes Rehabilitation
	Target Area	
	Goals Supported	Housing: Owner-Occupied and Rental Rehabilitation
	Needs Addressed	Affordable Housing
	Funding	:

	Description	Rehabilitation of public housing units. Project consists of exterior door and hardware replacement, window replacement, and lead-based paint abatement. Hilltop provides 34 units of affordable rental housing.
	Target Date	10/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	34 housing units
	Location Description	100 McKinley Avenue, Eveleth, MN 55734
	Planned Activities	Rehabilitation of public housing units. Project consists of exterior door and hardware replacement, window replacement, and lead-based paint abatement. Hilltop provides 34 units of affordable rental housing.
6	Project Name	North St Louis County Habitat for Humanity - Habitat Building Program
	Target Area	
	Goals Supported	Housing: Owner and Renter Housing Development
	Needs Addressed	Affordable Housing
	Funding	:
	Description	Acquisition of lots for new construction of homes, rehabilitation of recycled homes, and potential acquisition/rehabilitation of an existing home for resale to Habitat partner families. The developed homes are sold to low-income, first-time homebuyer families on a 0 percent, 30 year mortgage.
	Target Date	10/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	2 LMI families
	Location Description	Community Wide Activity: Contact North St. Louis County Habitat for Humanity, 5558 Enterprise Dr. NE; P.O. Box 24, Virginia, MN 55792

	Planned Activities	Acquisition of lots for new construction of homes, rehabilitation of recycled homes, and potential acquisition/rehabilitation of an existing home for resale to Habitat partner families. The developed homes are sold to lowâ¿iincome, firstâ¿iitime homebuyer families on a 0 percent, 30 year mortgage.
7	Project Name	Northeast Entrepreneur Fund - Microenterprise Business Assistance
	Target Area	
	Goals Supported	Economic Development: Microenterprise Assistance
	Needs Addressed	Economic Development
	Funding	:
	Description	County-wide program provides technical assistance and educational training to individual entrepreneurs and start-up businesses through group workshops and one-on-one counseling. CDBG assistance leverages loan funding. Entrepreneur Fund operations are based in Eveleth.
	Target Date	10/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	10 LMI persons
	Location Description	Entrepreneur Fund, 551 Hat Trick Avenue, Eveleth MN 55734
	Planned Activities	Countyâ¿ wide program provides technical assistance and educational training to individual entrepreneurs and startâ¿ up businesses through group workshops and oneâ¿ onâ¿ one counseling. CDBG assistance leverages loan funding. Entrepreneur Fund operations are based in Eveleth.
8	Project Name	SOAR Career Solutions
	Target Area	
	Goals Supported	Public Services
	Needs Addressed	Economic Development
	Funding	:

	Description Target Date	Program assists unemployed and underemployed persons develop a career plan and gain entry into livable wage employment or self-employment through workshops, classes and one-on-one focus. Additional services include short term case management to overcome identified employment barriers prior to enrolling in pre-employment training to increase access to employment for low-moderate income clients. SOAR is a community based development organization, CBDO. 10/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	25 LMI persons
	Location Description	Communityâ¿Â⊠wide: Contact SOAR Career Solutions, 205 West 2nd Street, Suite 101, Duluth, MN 55802
	Planned Activities	Program assists unemployed and underemployed persons develop a career plan and gain entry into livable wage employment or self- employment through workshops, classes and one-on-one focus. Additional services include short term case management to overcome identified employment barriers prior to enrolling in pre-employment training to increase access to employment for low-moderate income clients. SOAR is a community based development organization, CBDO.
9	Project Name	City of Buhl - Buhl/Kinney Senior Center Improvements
	Target Area	
	Goals Supported	Community Facilities: Improvements
	Needs Addressed	Community Facilities and Public Infrastructure
	Funding	:
	Description	Project improvements include covering old, worn floors with new flooring, the replacement of windows with newer, energy efficient windows, and installation of ADA compliant bathroom doors. The Senior Center serves the communities of Buhl and Kinney.
	Target Date	10/31/2023

	Estimate the number and type of families	Community-wide impact
	that will benefit	
	from the proposed	
	activities	
	Location Description	302 Franz Street, Buhl, MN 55713
	Planned Activities	Project improvements include covering old, worn floors with new
		flooring, the replacement of windows with newer, energy efficient
		windows, and installation of ADA compliant bathroom doors. The Senior
		Center serves the communities of Buhl and Kinney.
10	Project Name	City of Gilbert - Community Center Accessibility Improvements - Phase II
	Target Area	
	Goals Supported	Community Facilities: Accessibility
	Needs Addressed	Community Facilities and Public Infrastructure
	Funding	:
	Description	Phase II of the project involves reconstruction of the existing bathroom facilities to create accessibility for persons with a physical disability or mobility impairment and other accessibility improvements to the lower level of the facility.
	Target Date	10/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	Persons with a physical disability or mobility impairment.
	Location Description	18 North Broadway Avenue, Gilbert, MN 55741
	Planned Activities	Phase II of the project involves reconstruction of the existing bathroom facilities to create accessibility for persons with a physical disability or mobility impairment and other accessibility improvements to the lower level of the facility.
11	Project Name	City of Aurora - Water Treatment Facility Construction
	Target Area	
	Goals Supported	Public Infrastructure: Improvements
	Needs Addressed	Community Facilities and Public Infrastructure

	Funding	
	Description	CDBG funds will be targeted to construction of a new water intake and treatment facility immediately west of the City of Aurora water tower at 1 Industrial Drive, Aurora, MN, providing a capacity of 1 million gallons of water a day. The new facility will replace the current City of Aurora water treatment plant that is unable to provide the water quality and volume proposed.
	Target Date	10/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	1761 families served by the public utility.
	Location Description	Aurora Water Tower- Water Treatment Plant - 1 Industrial Drive, Aurora, MN 55705
	Planned Activities	CDBG funds will be targeted to construction of a new water intake and treatment facility immediately west of the City of Aurora water tower at 1 Industrial Drive, Aurora, MN, providing a capacity of 1 million gallons of water a day. The new facility will replace the current City of Aurora water treatment plant that is unable to provide the water quality and volume proposed.
12	Project Name	Township of Breitung - Infrastructure
	Target Area	
	Goals Supported	Public Infrastructure: Improvements
	Needs Addressed	Community Facilities and Public Infrastructure
	Funding	:
	Description	The project is replacement of sanitary sewer lines, manholes to improve inflow and infiltration into the sanitary sewer system along Poplar Street, Church Street, and Spring Road, all within Soudan, MN. The installation will be in the same trench and same elevation as the existing sanitary sewer line is located.
	Target Date	10/31/2023

	Estimate the number and type of families that will benefit from the proposed activities	413 families served by the public utility.
	Location Description	CT:015400 BG: 03 County: 279137
	Planned Activities	The project is replacement of sanitary sewer lines, manholes to improve inflow and infiltration into the sanitary sewer system along Poplar Street, Church Street, and Spring Road, all within Soudan, MN. The installation will be in the same trench and same elevation as the existing sanitary sewer line is located.
13	Project Name	City of Ely - Wastewater Treatment Facility Improvements
	Target Area	
	Goals Supported	Public Infrastructure: Improvements
	Needs Addressed	Community Facilities and Public Infrastructure
	Funding	:
	Description	Proposed wastewater treatment facility improvements include the design and construction of a new filtration system to handle peak flows and to reduce mercury discharge to meet Minnesota Pollution Control discharge permit requirements. The MPCA compliance deadline for permit standards is March 2023.
	Target Date	10/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	3225 families served by the public utility.
	Location Description	CT: 015300 BG: 1,2,3,4,& 5 County: 279137
		25 Chandler Street West, Ely, MN 55731
	Planned Activities	Proposed wastewater treatment facility improvements include the design and construction of a new filtration system to handle peak flows and to reduce mercury discharge to meet Minnesota Pollution Control discharge permit requirements. The MPCA compliance deadline for permit standards is March 2023.
	Project Name	City of Eveleth - Infrastructure

14	Target Area	
	Goals Supported	Public Infrastructure: Improvements
	Needs Addressed	
		Community Facilities and Public Infrastructure
	Funding	:
	Description	The project includes reconstruction of water main, sanitary sewer, and storm sewer between 700-1000 block on Douglas Avenue and 100-400 Block of Roosevelt Ave within the City of Eveleth. CDBG funding will be concentrated to Douglas Avenue.
	Target Date	10/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	365 families served by the public utility.
	Location Description	CT: 013300 BG: 1 County: 279137 Douglas Avenue
	Planned Activities	The project includes reconstruction of water main, sanitary sewer, and storm sewer between 700-1000 block on Douglas Avenue and 100-400 Block of Roosevelt Ave within the City of Eveleth. CDBG funding will be concentrated to Douglas Avenue.
15	Project Name	City of Floodwood - Infrastructure
	Target Area	
	Goals Supported	Public Infrastructure: Improvements
	Needs Addressed	Community Facilities and Public Infrastructure
	Funding	:
	Description	Rehabilitation to the lift station that handles all of the city sanitary waste. The structure and two pumps are beyond repair and require replacement. Improvements will also reduce inflow and infiltration to the city treatment facility.
	Target Date	10/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	470 families served by the public utility.

Location DescriptionCT: 011200 BG: 2 County: 279137702 E 8th Ave, Floodwood, MN 55736	
702 E 8th Ave, Floodwood, MN 55736	
Planned ActivitiesRehabilitation to the lift station that handles all of the cit waste. The structure and two pumps are beyond repair a replacement. Improvements will also reduce inflow and i the city treatment facility.	and require
16 Project Name City of Hibbing - Infrastructure	
Target Area	
Goals Supported Public Infrastructure: Improvements	
Needs Addressed Community Facilities and Public Infrastructure	
Funding :	
DescriptionPhase 10 rehabilitation of sanitary sewer pipe by placing liner in approximately 12,000 feet of piping in LMI areas project will reduce sanitary sewer failures, backups, and infiltration entering the wastewater treatment facility. L Homeacres and Rosemount Addition neighborhoods, wh Avenue to 5th Avenue East and 37th Street to Highway 1	in the city. The inflow and ocations: ich is from 1st
Target Date 10/31/2023	
Estimate the number1120 families served by public utility.and type of familiesthat will benefitfrom the proposedactivities	
Location Description CT: 012400 BG: 2 and CT: 012400 BG: 3 County: 279137	
Planned ActivitiesPhase 10 rehabilitation of sanitary sewer pipe by placing liner in approximately 12,000 feet of piping in LMI areas project will reduce sanitary sewer failures, backups, and infiltration entering the wastewater treatment facility. Locations: Homeacres and Rosemount Addition which is from 1st Avenue to 5th Avenue East and 37th St 169.	in the city. The inflow and neighborhoods,
17 Project Name Hibbing Public Utilities Commission - Infrastructure	
Target Area	
Goals Supported Public Infrastructure: Improvements	
Needs Addressed Community Facilities and Public Infrastructure	

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	Funding	:
	Description	Project consists of reconstruction of approximately 1,900 feet of aged and deteriorating watermain and service lines within Park Addition - 3rd Ave East & 18th Street, Hibbing to improve water pressure, eliminate watermain break emergencies, and costly repairs.
	Target Date	10/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	690 families served by the public utility.
	Location Description	CT 012200 BG: 2 County 279137
	Planned Activities	Project consists of reconstruction of approximately 1,900 feet of aged and deteriorating watermain and service lines within Park Addition - 3rd Ave East & 18th Street, Hibbing to improve water pressure, eliminate watermain break emergencies, and costly repairs.
18	Project Name	City of Orr - Infrastructure
	Target Area	
	Goals Supported	Public Infrastructure: Improvements
	Needs Addressed	Community Facilities and Public Infrastructure
	Funding	:
	Description	Project is the rehabilitation of the lift station and forcemain on King Road in Orr to improve service, reduce inflow and infiltration, and create a more stable flow to the wastewater treatment plant.
	Target Date	10/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	255 families served by the public utility.
	Location Description	CT: 015500 BG: 1 & 3 County: 279137
		10557 King Road, Orr, MN 55771
	Planned Activities	Project is the rehabilitation of the lift station and forcemain on King Road in Orr to improve service, reduce inflow and infiltration, and create a more stable flow to the wastewater treatment plant.

19	<b>a</b>	
	Project Name	City of Virginia - Infrastructure
	Target Area	
	Goals Supported	Public Infrastructure: Improvements
	Needs Addressed	Community Facilities and Public Infrastructure
	Funding	:
	Description	The project proposes rehabilitation of the City of Virginia lift stations that are out of date and in need of upgrading. The four (4) Lift Station Sites eligible for CDBG funding are: Hoover Road, Northwoods, Silver Lake, and Finn Town.
	Target Date	10/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	850 families served by the public utility.
	Location Description	City of Virginia, 327 1st Street South, Virginia, MN 55792 CT: 013100 BG: 1 County: 279137
	Planned Activities	The project proposes rehabilitation of the City of Virginia lift stations that are out of date and in need of upgrading. The four (4) Lift Station Sites eligible for CDBG funding are: Hoover Road, Northwoods, Silver Lake, and Finn Town.
20	Project Name	City of Winton - Infrastructure
	Target Area	
	Goals Supported	Public Infrastructure: Improvements
	Needs Addressed	Community Facilities and Public Infrastructure
	Funding	:
	Description	The Winton water supply system experienced freezing and loss of water to the entire city because of deficiencies in the vault structure beneath the elevated storage tank. The vault structure contains recirculating pumps and heating equipment to prevent freezing. Improvement will be made to the vault structure, pumps, and heating equipment to prevent future failure.
	Target Date	10/31/2023

	Estimate the number and type of families that will benefit from the proposed activities	105 families served by the public utility.
	Location Description	City of Winton, 102 North Main Street, PO Box 163, Winton, MN 55796 CT: 015400 BG:01 County: 279137
	Planned Activities	The Winton water supply system experienced freezing and loss of water to the entire city because of deficiencies in the vault structure beneath the elevated storage tank. The vault structure contains recirculating pumps and heating equipment to prevent freezing. Improvement will be made to the vault structure, pumps, and heating equipment to prevent future failure.
21	Project Name	Advocates for Family Peace - Children's Program
	Target Area	
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	:
	Description	Provides direct and extended services to children witnessing domestic violence and their parents. The program consists of services designed to increase victim safety, access to stable housing and help a child or adolescent with trauma he or she experienced.
	Target Date	10/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	150
	Location Description	820 9th Street North, Suite 150, Virginia, MN 55792
	Planned Activities	Provides direct and extended services to children witnessing domestic violence and their parents. The program consists of services designed to increase victim safety, access to stable housing and help a child or adolescent with trauma he or she experienced.
22	Project Name	Arrowhead Economic Opportunity Agency - Homeless Shelter Operations
	Target Area	
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	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	:
	Description	The only emergency shelter service for homeless population in rural St. Louis County. Funds will support shelter aide, crisis intervention/case management, and operations. Essential component of the Continuum of Care.
	Target Date	10/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	125
	Location Description	Bill's House (AEOA), 210 3rd Street N, Virginia, MN 55792
	Planned Activities	The only emergency shelter service for homeless population in rural St. Louis County. Funds will support shelter aide, crisis intervention/case management, and operations. Essential component of the Continuum of Care.
23	Project Name	Arrowhead Economic Opportunity Agency - Homeless Youth Services
	Target Area	
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	:
	Description	Case management services to youth participating in the Virginia Youth Foyer housing project. Supportive services provided include comprehensive employment services, continuing education, access to mental and physical health care, social and recreational activities and independent living skills.
	Target Date	10/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	50

	Location Description	AEOA Homeless Youth Services, 302 12th Street South, Virginia, MN 55792
	Planned Activities	Case management services to youth participating in the Virginia Youth Foyer housing project. Supportive services provided include comprehensive employment services, continuing education, access to mental and physical health care, social and recreational activities and independent living skills.
24	Project Name	Legal Aid Service of NE Minnesota - Housing Counseling, Information & Litigation Project
	Target Area	
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	:
	Description	Funds will support staff in providing homelessness prevention and essential legal services to those at risk of homelessness and very low income clients. Essential component of the Continuum of Care.
	Target Date	10/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	250
	Location Description	Legal Aid Service of Northeastern Minnesota, 820 N. 9th Street, Suite 200, Virginia, MN 55792
	Planned Activities	Funds will support staff in providing homelessness prevention and essential legal services to those at risk of homelessness and very low income clients. Essential component of the Continuum of Care.
25	Project Name	Project Care Free Clinic - Clinic Operations
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	:

	Description Target Date Estimate the number and type of families that will benefit from the proposed activities	Funding assistance for the administrator and site coordinator salaries. The program provides healthcare access and outreach to people who are uninsured or under insured while networking with other community- based organizations to facilitate continued treatment, screenings, and education. Offices are located in Hibbing and Virginia. 1800
	Location Description	3112 6th Ave East, Hibbing, MN 55746 500 S 12th Ave West, Virginia, MN 55792
	Planned Activities	Funding assistance for the administrator and site coordinator salaries. The program provides healthcare access and outreach to people who are uninsured or under insured while networking with other community- based organizations to facilitate continued treatment, screenings, and education. Offices are located in Hibbing and Virginia.
26	Project Name	Quad City Food Shelf - AEOA - Food Shelf Operations
	Target Area	
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	:
	Description	Assistance with salary for a part-time coordinator/manager for the food shelf program. QCFS is the largest food shelf in the area and is operated primarily with volunteers. It serves the communities of Virginia, Eveleth, Gilbert, and Mountain Iron. Essential component of the Continuum of Care.
	Target Date	10/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	6600
	Location Description	Quad City Food Shelf, 8367 Enterprise Dr NE, Mt. Iron, MN 55768

	Planned Activities	Assistance with salary for a part-time coordinator/manager for the food shelf program. QCFS is the largest food shelf in the area and is operated primarily with volunteers. It serves the communities of Virginia, Eveleth, Gilbert, and Mountain Iron. Essential component of the Continuum of Care.
27	Project Name	Range Transitional Housing - Transitional & Permanent Housing Program
	Target Area	
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	:
	Description	RTH provides the only full term transitional housing program for homeless families in rural St. Louis County. Funds will support case management and operations. Essential component of the Continuum of Care.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	70
	Location Description	220 5th Street N, Virginia, MN 55792
	Planned Activities	RTH provides the only full term transitional housing program for homeless families in rural St. Louis County. Funds will support case management and operations. Essential component of the Continuum of Care.
28	Project Name	The Salvation Army - Hibbing - Melting Pot Meals Program
	Target Area	
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	:
	Description	Provides one meal per day to homeless and low income individuals and families in the Hibbing area. Funds support a full-time coordinator to train volunteers and oversee daily operation. Essential component of the Continuum of Care.

	Target Date	10/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	7500 families
	Location Description	Salvation Armyâ¿IHibbing, 107 West Howard Street, Hibbing, MN 55746
	Planned Activities	Provides one meal per day to homeless and low income individuals and families in the Hibbing area. Funds support a fullâ¿Itime coordinator to train volunteers and oversee daily operation. Essential component of the Continuum of Care.
29	Project Name	The Salvation Army - Virginia - Virginia Supper Club
	Target Area	
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	:
	Description	Serves one meal per day to homeless and low income individuals and families in the Virginia area. Funds support a coordinator to train volunteers and oversee daily operations. Essential component of the Continuum of Care.
	Target Date	10/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	12000 families
	Location Description	Salvation Armyâ¿🛛 Virginia, 507 12th Avenue West, Virginia, MN 55792
	Planned Activities	Serves one meal per day to homeless and low income individuals and families in the Virginia area. Funds support a coordinator to train volunteers and oversee daily operations. Essential component of the Continuum of Care.
30	Project Name	Sexual Assault Program of Northern St Louis County - Youth Outreach Services
	Target Area	
	Goals Supported	Public Services

	Needs Addressed	Public Services
	Funding	:
	Description	The program is dedicated to the elimination of child abuse and sexual assault, while providing comprehensive support to victims and their families, through prevention, education and early intervention.
	Target Date	10/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	225 families
	Location Description	Sexual Assault Program, 327 1st Street S., Suite 17, Virginia, MN 55792
	Planned Activities	The program is dedicated to the elimination of child abuse and sexual assault, while providing comprehensive support to victims and their families, through prevention, education and early intervention.
31	Project Name	United Way of Northeastern MN - Buddy Backpacks Program
	Target Area	
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	:
	Description	The Buddy Backpacks program provides a meal kit each Friday filled with nutritious, nonperishable, child-friendly fooditems to food-insecure children who would otherwise suffer from hunger over the weekends. In addition to COVID-19 impacts, the program has experienced increased demand for services, reduced donations, and rising costs for food.
	Target Date	10/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	1200
	Location Description	United Way of NE MN: 608 East Drive, Chisholm, MN 55719

	Planned Activities	The Buddy Backpacks program provides a meal kit each Friday filled with nutritious, nonperishable, child-friendly food items to food-insecure children who would otherwise suffer from hunger over the weekends. In addition to COVID-19 impacts, the program has experienced increased demand for services, reduced donations, and rising costs for food.
32	Project Name	St Louis County - General Administration
	Target Area	
	Goals Supported	Housing: Home Ownership Education Housing: Owner and Renter Housing Development Housing: Home Ownership Assistance Program Housing: Owner-Occupied and Rental Rehabilitation Public Services Public Infrastructure: Improvements Community Facilities: Accessibility Community Facilities: Improvements Economic Development: Microenterprise Assistance Economic Development: Career Development
	Needs Addressed	Affordable Housing Economic Development Community Facilities and Public Infrastructure Public Services
	Funding	:
	Description	Provide for general administration of the CDBG program.
	Target Date	10/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	St. Louis County Planning and Community Development Department, 201 S 3rd Ave W, Virginia, MN 55792
	Planned Activities	Provide for general administration of the CDBG program.
33	Project Name	HOME: CHDO Set Aside
	Target Area	
	Goals Supported	Housing: Owner and Renter Housing Development
	Needs Addressed	Affordable Housing

	Funding	:
	Description	Approved CHDOs will develop or rehabilitate single family or rental housing. Eligible projects will include those connected to the Continuum of Care Plans for St. Louis County and Northeastern Minnesota.
	Target Date	10/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	2 LMI housing units
	Location Description	One Roof Community Housing, 12 East 4th Street, Duluth, MN 55805
		AEOA, 702 3rd Avenue South, Virginia, MN 55792
	Planned Activities	Approved CHDOs will develop or rehabilitate single family or rental housing. Eligible projects will include those connected to the Continuum of Care Plans for St. Louis County and Northeastern Minnesota.
34	Project Name	HOME: Home Ownership Assistance Program (HOAP)
	Target Area	
	Goals Supported	Housing: Home Ownership Assistance Program
	Needs Addressed	Affordable Housing
	Funding	:
	Description	Provision of deferred loans for down payment, closing costs, and rehabilitation to qualified low- and moderate-income first-time home buyers and provision of rehabilitation assistance to eligible owner- occupant households. Program details are contained in the Action Plan narrative.
	Target Date	10/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	60 LMI families
	Location Description	Available is all five counties of the HOME Consortium AEOA, 702 S 3rd Ave, Virginia, MN 55792 KOOTASCA Community Action, 201 NW 4th St, Ste. 130, Grand Rapids, MN 55744

	Planned Activities	Provision of deferred loans for down payment, closing costs, and rehabilitation to qualified low- and moderate-income first-time home buyers and provision of rehabilitation assistance to eligible owner- occupant households. Program details are contained in the Action Plan narrative.
35	Project Name	HOME: Program Administration
	Target Area	
	Goals Supported	Housing: Home Ownership Education Housing: Owner and Renter Housing Development Housing: Home Ownership Assistance Program Housing: Owner-Occupied and Rental Rehabilitation Public Services Public Infrastructure: Improvements Community Facilities: Accessibility Community Facilities: Improvements Economic Development: Microenterprise Assistance Economic Development: Career Development
	Needs Addressed	Affordable Housing Economic Development Community Facilities and Public Infrastructure Public Services
	Funding	:
	Description	Administrative funding allocated to St. Louis County as lead entity for the HOME Consortium.
	Target Date	10/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	St. Louis County Planning and Community Development Department, 201 S 3rd Ave W, Virginia, MN 55792
	Planned Activities	Administrative funding allocated to St. Louis County as lead entity for the HOME Consortium.
36	Project Name	HOME: Housing Development Fund
	Target Area	

	Goals Supported	Housing: Owner and Renter Housing Development
	Needs Addressed	Affordable Housing
	Funding	:
	Description	Funding held in reserve for future HOME-eligible activities.
	Target Date	10/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	3 LMI housing units
	Location Description	St. Louis County Planning and Community Development Department, 201 S 3rd Ave W, Virginia, MN 55792
	Planned Activities	Funding held in reserve for future HOME-eligible activities.
37	Project Name	ESG2022 ST. LOUIS COUNTY
	Target Area	
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	:
	Description	Allocations will be made to nonprofit agencies that provide emergency shelter, homeless prevention, rapid-rehousing, street outreach, and homeless management information systems programs consistent with the County Continuum of Care Plan to End Homelessness. The entitlement listed below includes the funded activities and the eligible 7.5% in administrative funding for St. Louis County.
	Target Date	10/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	325 families homeless or at-risk of homelessness.
	Location Description	St. Louis County Planning and Community Development Department, 201 S 3rd Ave W, Virginia, MN 55792

Planned ActivitiesAllocations will be made to nonprofit agencies that provide emershelter, homeless prevention, rapid-rehousing, street outreach, a	
	homeless management information systems programs consistent with
	the County Continuum of Care Plan to End Homelessness. The
	entitlement listed below includes the funded activities and the eligible
	7.5% in administrative funding for St. Louis County.

## AP-50 Geographic Distribution - 91.420, 91.220(f)

# Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

Housing affordability has become more challenging. Housing and rental costs have continued to increase while wages have either stayed the same or increased slightly. Lower priced homes and rental units are typically in need of repair and are undesirable for individuals and families looking for decent housing. The County and Consortium have a limited supply of decent affordable housing.

### **Geographic Distribution**

Γ	Target Area	Percentage of Funds
	St. Louis County and the NE Minnesota HOME Consortium	100

Table 5 - Geographic Distribution

### Rationale for the priorities for allocating investments geographically

St. Louis County is an urban entitlement county for CDBG funding. The County has an annual competitive application process with project applications submitted in four categories: housing, economic development, physical improvement, and public services. Eligible applicants are cities, townships, and nonprofits operating within St. Louis County. Applications are reviewed by a Citizen Advisory Committee which provides a funding recommendation to the St. Louis County Board.

St. Louis County is the lead agency for the St. Louis County Consortium which also includes Cook, Itasca, Koochiching and Lake counties. Similar to CDBG, there is an annual competitive award process. A HOME Consortium Advisory Committee, comprised of representatives of each of the jurisdictions reviews applications and makes funding recommendations to the St. Louis County Board.

ESG funding is also allocated annually based on application review and award recommendation by the Rural Housing Coalition as its advisory group. The RHC recommendation is shared with the CoC Advisory Committee to assure alignment with the CoC strategies. Results of this process are provided as a funding recommendation to the St. Louis County Board.

#### Discussion

No further discussion.

## **Affordable Housing**

## AP-55 Affordable Housing - 91.420, 91.220(g)

## Introduction

Housing affordability has become more challenging. Housing and rental costs have continued to increase while wages have either stayed the same or increased slightly. Lower priced homes and rental units are typically in need of repair and are undesirable for individuals and families looking for decent housing. The County and Consortium have a limited supply of decent affordable housing.

One Year Goals for the Number of Households to be Supported		
Homeless	0	
Non-Homeless	87	
Special-Needs	0	
Total	87	

Table 6 - 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	2	
Rehab of Existing Units	25	
Acquisition of Existing Units	60	
Total	87	

Table 7 - One Year Goals for Affordable Housing by Support Type

## Discussion

St. Louis County and the Consortium were already experiencing a low vacancy rental market even before the COVID-19 pandemic began. The pandemic has put additional stress on the market making affordable rental units harder than ever to find. Monthly rental rates have also increased. The home ownership market is a little better with pockets of affordable homes available in certain localities across the County and Consortium. Use of the County Home Ownership Assistance Program experiences a winter slow down but has been steady for the past year in spite of the pandemic.

## AP-60 Public Housing - 91.420, 91.220(h)

### Introduction

The geographic boundaries of the County and Consortium incorporate twelve public housing authorities (PHAs). The independent structure and active involvement of the boards of directors for each of the PHAs has developed their autonomy and effectiveness at running their respective operations. The PHAs in the County and Consortium also meet periodically as a regional group to discuss issues and share experience in support of each other.

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

The jurisdiction's interaction with the PHAs has not historically involved funding projects specific to public housing. Staff of St. Louis County Planning and Community Development along with several of the PHAs interact through regional housing meetings and in the normal course of their respective operations. These opportunities facilitate collaborative project development between the jurisdiction, PHAs, and the nonprofit service providers throughout the County and Consortium. Projects undertaken have recently focused on assisting the homeless through inclusion of homelessness units in PHA developed properties. The region's PHAs are a vital component of the homelessness housing response priorities of the St. Louis County and Northeast Minnesota Continuums of Care.

The Chisholm HRA, Cook HRA, and Eveleth HRA applied for CDBG funding to rehabilitate their public housing units and was awared funding.

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

Promote active engagement and discussion between the PHAs and their respective tenants. An outreach program is being created to promote the NE MN HOME Consortium's Homeownership Assistance Program administered by AEOA and KOOTASCA Community Action to Public Housing Authorities throughout the Consortium area.

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

None of the public housing agencies in St. Louis County or the Consortium are designated as troubled.

#### Discussion

No further discussion.

## AP-65 Homeless and Other Special Needs Activities - 91.420, 91.220(i) Introduction

St. Louis County is made up of two entitlement communities, the City of Duluth and the remainder of St. Louis County outside Duluth. The St. Louis County Continuum of Care (CoC) encompasses both of these entitlement communities. Duluth and the County work in partnership with the homeless housing and service providers to address issues that impact persons who are homeless or at-risk of becoming homeless. The City and County, along with homeless housing and service providers, created a Continuum of Care Advisory Committee. Appointments to the Committee are made by the Duluth City Council and St. Louis County Board of Commissioners. The Committee oversees the annual CoC funding competition and maintains and updates the Plan to Prevent and End Homeless initiatives in Duluth and SLC, including the Family Homeless Prevention and Assistance Program (FHPAP) state funding competition, and provides input to the Emergency Solutions Grant Program funding processes for both Duluth and SLC.

The Plan to Prevent and End Homelessness employs a countywide perspective to create and distribute resources designed to help homeless individuals, families and youth. The Plan provides strategies to prevent homelessness and rapidly re-house persons in the most permanent housing possible. Both strategies include increasing housing stability and the security that goes along with stability, and preventing new occurrences of homelessness. Supportive services are provided in conjunction with and tailored to the housing options understanding that homelessness is not caused merely by lack of shelter. Homelessness also involves underlying, unmet physical, economic and/or social needs which must be addressed to assure longer-term client stability.

St. Louis County developed the 2022 Action Plan during the ongoing COVID-19 global pandemic and its response. During 2020, the County received CDBG-CV and ESG-CV funding made available through the CARES Act and funded activities in support of activities described in the 2022 Action Plan. St. Louis County continues to seek input from affected residents, communities, and agencies to utilize funding with the flexibility needed to benefit those impacted.

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

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

The St. Louis County Continuum of Care (CoC) is coordinated with housing and service providers and has developed a collaborative system to reach out to the homeless. An integral part of the system is coordinated entry and assessment. The CoC agencies use the Service Prioritization Decision Assistance Tool (SPDAT) as a common assessment tool for all homeless persons. As part of the assessment, all

individuals and families applying for housing assistance first undergo a pre-screen administered by Metro 2-1-1. This first step helps with prevention and diversion to refer those in need of emergency shelter. Clients are next administered the Vulnerability Index (VI) SPDAT at determined entry points. This is a quick, condensed version of the SPDAT and assigns the recipient an acuity score which aids determination of appropriate housing placement and prioritizes the most vulnerable individuals.

Once matched with the appropriate housing, the client case manager administers the SPDAT. The SPDAT measures a variety of issue categories that affect a person's stability. The categories are tracked over time through re-administration of the SPDAT every 3 months or so. The SPDAT can be input to the HMIS and allow service providers to track stability much more effectively and show with data the progress an individual or family is making toward housing stability.

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

The Coordinated Entry System provides persons experiencing a housing crisis with a housing solution efficiently and effectively. The transitional housing providers, emergency shelters, permanent supportive housing providers, and public housing providers have collaborated to create the system. The agencies also worked to develop goals and standards for each part of the system utilized by clients. For example, in shelter the goal is to reduce bed nights or average stay in shelter before movement to permanent housing. For transitional housing for 6 months rather than returning to the street. Clients in a permanent housing situation such as permanent supportive housing or public housing have a goal to maintain their housing for 6 months. During all housing stages, providers will work with clients to build independent living skills, stabilize income and employment, access health and education services, and other supportive programs to maintain housing stability.

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

St. Louis County will use a combination of CoC, FHPAP, ESG, HOME, and CDBG funding to support components of the plan to end homelessness guided by the CoC Advisory Committee and the respective advisory committees for each funding source.

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

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## assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

The St. Louis County Plan to End Homelessness includes uniform discharge protocols and procedures that prevent people who are being released from county institutions from being discharged into homelessness. The discharge plan outlines transition process steps, based on an evidence-based model called Critical Time Intervention, a standardized assessment tool that is used by all discharging entities upon client admission to identify those at risk of homelessness, specific services to be offered to all clients and additional services offered to at-risk clients. The Discharge Plan also outlines the roles and responsibilities of the collaborative partner agencies, including coordination, information sharing, staffing patterns for institutional-based and community-based staff, and training.

#### Discussion

No further discussion.

## AP-75 Barriers to affordable housing -91.420, 91.220(j)

### Introduction

Public policies are not viewed as creating an undue or inequitable burden on affordable housing. The County's efforts have instead focused on the following identified barriers:

- Lack of capacity to develop housing by nonprofit organizations
- High cost of new housing construction vs. expected return on investment
- Enormity of the need for rehabilitation and the tendency to focus on "worst case" versus comprehensive area rehab
- Low market rents historically paid by renters
- Poor soil conditions and bed rock which escalate infrastructure costs
- Relatively low population density
- Lack of innovation in construction methods
- Limited involvement of private developers and the local financial community in regional development

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

Actions planned for FY 2022 listed below continue to be aimed at reducing the impact of barriers to affordable housing:

- Assist regional CHDOs with owner-occupied and rental housing development: review site selection and design, encourage innovation and cost savings measures, and increase leverage through access to other sources of funding.
- Encourage the development of mixed-income housing in the smaller communities in order to increase the stock of affordable units and to reduce per unit cost. Provide technical assistance to communities in housing development.
- Encourage the examination of alternative sites and technologies for new housing production in order to reduce development costs.
- Encourage use of affordable mortgage products by the region's mortgage providers: expand the availability of purchase plus rehab mortgages.
- Evaluate the county-supported housing programs for cost effectiveness, efficiency, and

performance.

- Research alternative programs and incorporate enhancements.
- Expand outreach efforts.
- Increase leverage through access to additional funding sources.
- Foster collaborative efforts within the northeast region to build capacity in housing development through training seminars and forums on rural housing issues.

Affordable housing projects funded in the FY 2022 Action Plan include the following:

- The Home Ownership Assistance Program, funded through the HOME allocation, provides financial assistance to first-time home buyers.
- The CDBG-funded Single Family Housing Rehabilitation Program provides deferred loans to lowand moderate-income households for eligible property improvements in St. Louis County.
- HOME CHDO Set-Aside funding One Roof Community Housing will assist with the acquisition/rehab/resale of owner-occupied homes for low- and moderate-income households. Sale as land trust homes creates permanent affordability.
- CDBG funding to the North St. Louis County Habitat for Humanity affiliate will assist with acquisition of sites for single family style homes or acquisition/rehab of existing homes. The completed homes are sold to Habitat partner families.

#### Discussion

St. Louis County developed the 2022 Action Plan during the ongoing COVID-19 global pandemic and its response. During 2020, the County received CDBG-CV and ESG-CV funding made available through the CARES Act and funded activities in support of activities described in the 2022 Action Plan. St. Louis County continues to seek input from affected residents, communities, and agencies to utilize funding with the flexibility needed to benefit those impacted.

## AP-85 Other Actions - 91.420, 91.220(k)

### Introduction

The Consolidated Plan represents a collaborative process. The County along with cities, townships, nonprofit agencies, Consortium members, and citizens identified housing, homeless and community development needs, and then established goals, priorities and strategies to address those needs. The goals, priorities and strategies are reviewed annually. This review coincides with the County Board's approval of the one year action plan and funding allocations.

The County has developed a strategic vision through the Consolidated Plan process which integrates economic, physical, environmental, community, and human development concerns in a comprehensive and coordinated fashion. CPD programs alone cannot fund all of the priority needs, but by developing partnerships with the entities previously mentioned, the collaboration can have an impact in achieving community goals.

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

Reductions and the uncertain availability of federal and state funds impact the ability to meet the needs of the underserved. The regional economy puts additional pressures on the systems in place to serve this population. The lack of funding and capacity limits agencies and local government's ability to undertake new initiatives. St. Louis County will work to address the following barriers:

- Increase employment opportunities for low- and moderate-income persons
- Remove physical barriers
- Remove impediments to fair housing and equal housing choice
- Remove barriers to affordable housing
- Foster relationships with public, private, nonprofit organizations to improve communities, expand housing opportunities and promote economic self sufficiency

## Actions planned to foster and maintain affordable housing

See section AP-75 above

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

In an effort to evaluate and reduce lead-based paint hazards, the County and Consortium place emphasis on educating the homeowners and tenants of structures built prior to 1978. The County and Consortium work with housing program administrators to develop required packets of information notifying homeowners and tenants of the dangers and symptoms of lead-based paint poisoning, and preventative measures regarding lead-based paint.

The Planning and Community Development Department consults with the County's Public Health and Human Services Department regarding lead-based paint, radon, and other environmental issues residents may experience. As an urban county entitlement, St. Louis County integrates lead-based paint regulations to the CDBG- and HOME-funded housing rehabilitation programs and projects. Planning and Community Development staff members participate in HUD lead-based paint training when provided and distribute information about training opportunities to all housing program administrators.

Lead-based paint regulations have resulted in increased administrative costs for project oversight, decreased program production, and increased activity completion times. The County continues to address these issues through information sharing with other local, state and federal agencies to gain best practice insight.

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

Activities funded in the 2022 Action Plan that support poverty-level families are as follows:

- One Roof Community Housing acquisition/rehab/resale project
- Habitat for Humanity rehabilitation and resale project
- Entrepreneur Fund microenterprise business development technical assistance
- Nine infrastructure projects that reduce community cost to aid with increasing utility costs for families
- Four community facility projects to address safety issues and create accessibility for persons with a physical disability or mobility impairment
- AEOA Homeless Shelter and Homeless Youth programs
- Legal Aid Housing Counseling program
- Range Transitional Housing
- Salvation Army meals programs in Hibbing and Virginia
- Sexual Assault and Advocates for Family Peace youth programs
- SOAR Career Solutions employment training
- Project Care Free Clinic provides free healthcare to uninsured and under insured clients
- Quad City Food Shelf
- United Way of NE MN buddy backpack program provides meals to low income kids while not in school

## Actions planned to develop institutional structure

No new initiatives are planned to develop the institutional structure. While the geographic area of the County and Consortium is large, contact between agencies is regular through use of electronic means.

Agencies are also of a scale that we know each other personally.

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

Maintain participation in and connection with the existing communication networks of housing and service provider agencies. Staffing reductions by all agencies connected to these networks has built agency interdependence and collaborative effort. Outside Duluth, there is little overlap of service provider necessitating this collaboration.

## Discussion

No further discussion.

## Program Specific Requirements AP-90 Program Specific Requirements - 91.420, 91.220(I)(1,2,4)

## Introduction

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The table that follows identifies program income projected to be received during the 2022 program year.

## 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	30,000
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:	30,000

#### **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.	99.23%

## HOME Investment Partnership Program (HOME) Reference 24 CFR 91.220(I)(2)

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

as follows:

The NE MN HOME Consortium's Advisory Committee set aside \$63,213 in a Housing Development Fund in FY 2021. This allotment will be reallocated into FY 2022 program year.

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:

Included in the 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:

Included in the 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:

Not applicable

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

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

Included in the 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 St. Louis County Continuum of Care (CoC) is coordinated with housing and service providers and has developed a collaborative system to reach out to the homeless. An integral part of the system is coordinated entry and assessment. The CoC agencies use the Service Prioritization Decision Assistance Tool (SPDAT) as a common assessment tool for all homeless persons. As part of the assessment, all individuals and families applying for housing assistance first undergo a pre-screen administered by Metro 2-1-1. This first step helps with prevention and diversion to refer those in need of emergency shelter. Clients are next administered the Vulnerability Index (VI) SPDAT at determined entry points. This is a quick, condensed version of the SPDAT and assigns the recipient an acuity score which aids determination of appropriate housing placement and prioritizes the most

vulnerable individuals.

Once matched with the appropriate housing, the client case manager administers the SPDAT. The SPDAT measures a variety of issue categories that affect a person's stability. The categories are tracked over time through re-administration of the SPDAT every 3 months or so. The SPDAT can be input to the HMIS and allow service providers to track stability much more effectively and show with data the progress an individual or family is making toward housing stability.

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).

Applications are requested by the County and reviewed through a multi-tiered process including:

- Community Development staff members
- Rural Housing Coalition attendees
- St. Louis County Continuum of Care Advisory Committee

A funding recommendation is then provided to the St. Louis County Board. The Board formally awards funding to agencies.

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

St. Louis County has been able to meet the homeless participation requirement. If unable to meet the homeless participation requirement, the County would seek input from clients assisted by the ESG providers. One method the County has previously used is to request assistance from Legal Aid with convening homeless person focus groups and soliciting their input through a series of questions and open dialog.

5. Describe performance standards for evaluating ESG.

Included in the appendix

HOME: St. Louis County uses HOME funds for homebuyer assistance of owner-occupied single-family housing and we use the HOME affordable homeownership limits provided by HUD on an annual basis. Our homebuyer assistance program is administered by AEOA and KOOTASCA Community Action. They meet with all potential first time homebuyers to determine income eligibility on a first come, first serve basis. Once eligibility is determined, the homebuyer goes through education and counseling. Once complete, they go shopping for a home within the affordability limits. St. Louis County staff underwrites the assistance and the property. Once approved, the closing is scheduled. All homebuyer information is avaiable at the administering agencies. St. Louis County does not limit the beneficiaries or gives preference to a segment of the low-income population. St. Louis County does not permit rental housing owners to limit tenants or give preferences in accordance with 24 CFR 92.253(d). St. Louis County, AEOA, and KOOTASCA Community Action employees administering HUD programs are not eligible for assistance.

Goal	Objective	Agency	Expected #	Source	2022	Totals
1	DH-1	AEOA-HOAP education	185	CDBG	-	
Housing Development						
2	DH-1	Habitat		CDBG	25,000	
	DH-3	Chisholm HRA	8	CDBG	38,000	
	DH-3	Cook HRA		CDBG	17,000	
	DH-3	Eveleth HRA		CDBG	50,000	
		One Roof - CHDO (w/CDBG)		HOME	150,000	
		AEOA - CHDO	1	HOME	75,000	
		Housing Development Fund	3	HOME	196,657	
		Total	73			551,657
Home Ownership Assistan	ce					
3	DH-1	AEOA/KOOT-HOAP	60	HOME	305,000	305,000
Housing Rehab	DU A	A AL 11	10		20.000	
4	DH-3	Access North		CDBG	20,000	
		AEOA SFR	15	CDBG	200,000	
		Total	25			220,000
Public Services						
5	SL-1	Advocates for Family Peace	150	CDBG	18,000	
		AEOA Shelter	125	CDBG	43,000	
		AEOA Youth Services	50	CDBG	23,000	
		Legal Aid	250	CDBG	33,000	
		Project Care Free Clinic	1,800	CDBG	15,000	
		Quad City Food Shelf	6,600	CDBG	13,000	
		RTH	70	CDBG	40,000	
		SA-Hibbing	7,500	CDBG	17,000	
		SA-Virginia	12,000		17,000	
		Sexual Assault	225	CDBG	23,000	
		United Way: Buddy Backpack	1,200	CDBG	18,000	260,000
		Street Outreach		ESG		-
		Rapid Re-Housing	15	ESG	108,993	
		Homeless Prevention		ESG	-	

		Emergency Shelter	145	ESG	44,063	
		HMIS		ESG	3,383	
		Total	30,280			156,439
Public Infrastructure						
6	SL-3	Aurora	1,761	CDBG	150,000	
		Breitung	413	CDBG	90,000	
		Ely	3,225	CDBG	140,000	
		Eveleth	365	CDBG	100,000	
		Floodwood	470	CDBG	140,000	
		Hibbing	1,120	CDBG	150,000	
		Hibbing PUC	690	CDBG	77,000	
		Orr	255	CDBG	90,000	
		Virginia	850	CDBG	65,000	
		Winton	105	CDBG	50,000	
		Total	9,254			1,052,000
		Count	10			, ,
Facility - Accessibility						
7	SL-1	Gilbert: Community Center	1	CDBG	50,000	
		Total	1			50,000

Goal	Objective	Agency		Expected #	Source	2022	Totals
Facility - Improvements 8	SL-3 SL-3	Buhl: Buhl/Kinney Senio NRP Total	r	1	CDBG CDBG	48,000	48,000
Facility - Demo/Clearance							
		Total		-			-
Micro-enterprise 9	EO-1	Entrepreuner Fund		10	CDBG	20,000	20,000
Job Training 10	EO-1	SOAR		25	CDBG	20,000	20,000
							2,683,096
CDBG HOME ESG	Grant 1,956,049 619,382 169,123		391,209 61,938 12,684	Program Incor 261,640 169,213	ne	I	Projects 1,826,480 726,657 156,439
							2,709,576

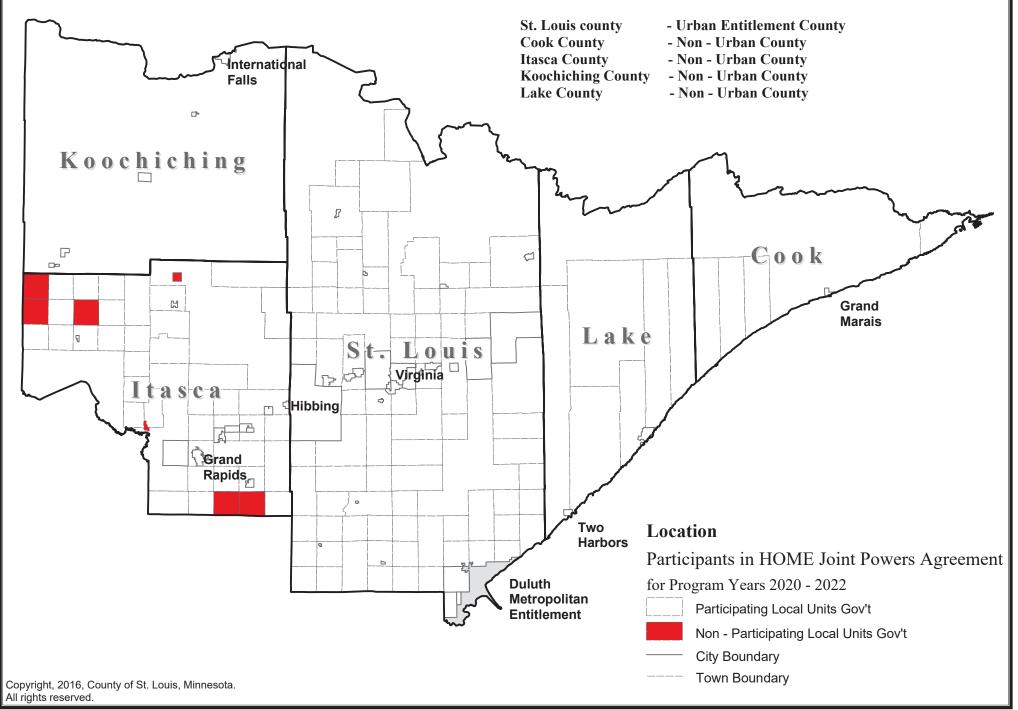
Table 3B Numbers	2022	2	
Rental	Agency	Source	Number
Acquisition of Existing			0
Production of New		CDBG	0
Rehab Existing	Chisholm HRA	CDBG	8
-	Cook HRA	CDBG	24
	Eveleth HRA	CDBG	34
		CHDO	
		Total	66
Rental Assist			0
		Total Rental	66

Owner-Occupied	Agency	Source	Number	
Acquisition of Existing	One Roof HDF One Roof	CDBG HOME CHDO	1 1 included v 2	with CDBG
Production of New	Habitat	CDBG	2	
Rehab Existing	AEOA Access North	CDBG CDBG CDBG CDBG CDBG Total	15 10 25	
Homebuyer Assist	AEOA/KOOT	HOME Total Owne	60 89	
		Total All	155	

Homeless Households

Acquisition of existing		62
Production of new		2
Rehab		91
	Totals	155

## NORTHEASTERN MINNESOTA HOME CONSORTIUM



## Northeast Minnesota HOME Consortium Home Ownership Assistance Program Recapture Guidelines

1. Introduction

The Northeast Minnesota HOME Consortium has adopted recapture guidelines for the financial assistance provided to low- and moderate-income households (Borrower) through the Home Ownership Assistance Program (HOAP). These guidelines fulfill requirements of the Federal regulations described in 24 CFR 254 (a) (5) (ii).

- 2. Recapture Requirements: Homebuyer Assistance
  - a. Subject to meeting the HOAP requirements, St. Louis County will provide, through the HOAP, to Borrower a Subsidy (the Subsidy) to assist with acquisition of real property (the Property). The Subsidy may include eligible costs for down payment and closing cost assistance provided to Borrower subject to the guidelines for the Northeast Minnesota HOME Consortium Home Ownership Assistance Program.
  - b. Borrower will sign a Written Agreement and Mortgage payable to St. Louis County to acknowledge receipt of the Subsidy. The Mortgage is filed with the appropriate county recording authority as evidence of the lien on the Property.
  - c. HOME Program Regulations at 24 CFR 254 require a minimum affordability period be imposed on the assisted property according to the following table:

Amount of HOME Assistance	Period of Affordability
Under \$15,000	5 Years
\$15,000 - \$40,000	10 Years
Over \$40,000	15 Years

HOME Program Regulations also permit HOME entitlement jurisdictions to impose longer periods of affordability based upon local program design. The affordability period for each written agreement will be in compliance with or greater than the minimum period established in this section and according to the following terms:

- i. If the Property or any interest in it is sold by the Borrower, and such sale occurs prior to expiration of the required affordability period, the Borrower will repay the Subsidy, without interest, on the date of sale. The Subsidy payoff will be calculated as follows:
- ii. The net proceeds of the sale will be determined. The net proceeds are defined as the selling price of the home less the Borrower's portion of the closing costs at sale less the loan repayment. Loan repayment is equal to the mortgage liens that are superior to the mortgage held by St. Louis County.

- Borrower will be entitled to retain the first \$1,000.00 of the net proceeds. If sufficient net proceeds remain after the Borrower retains the \$1,000.00, St. Louis County will recapture the balance of the HOME Program Subsidy. Additional net proceeds available after repayment of the Subsidy will be applied to payment of liens subordinate to the Subsidy, if any, or retained by the Borrower.
- iv. If the net proceeds applied to the Subsidy are insufficient to satisfy all or part of the Subsidy, the Subsidy will be considered paid, the Written Agreement and Mortgage will be satisfied, and all the affordability requirements of the HOAP and the federal HOME regulations at 24 CFR 92 will have been met.
- d. If the Written Agreement has not been paid pursuant to paragraph "c" above, the entire unpaid balance of the Subsidy will be forgiven at completion of the required affordability period. The Written Agreement and Mortgage will be satisfied, and all the affordability requirements of the HOAP and the federal HOME regulations at 24 CFR 92 will have been met.
- e. The attached Recapture Worksheet will be used to calculate the Subsidy recapture amount due to St. Louis County.
- 3. Noncompliance Requirements: Homebuyer Assistance

If the Borrower fails to occupy the Property as their principal residence and homestead for the required affordability period, the full amount of the Subsidy will be due and payable.

## Northeast Minnesota HOME Consortium Resale Guidelines

#### Introduction

The Northeast Minnesota HOME Consortium is made up of the counties of Cook, Itasca, Koochiching, Lake, and St. Louis, excluding the city of Duluth. St. Louis County serves as the lead entity and fiscal agent for the Consortium. The Consortium has adopted resale guidelines for the homebuyer housing units developed by One Roof Community Housing (One Roof). One Roof is both a certified Community Housing Development Organization (CHDO) of the Northeast Minnesota HOME Consortium and a Community Land Trust (CLT).

The Consortium may award CHDO funding to One Roof to develop housing for resale to a HOME Program eligible homebuyer. One Roof uses CHDO funding to make the developed housing's purchase price affordable to the homebuyer. The CHDO funding may be used to pay development gaps, land costs and to provide affordability gap funds directly to the homebuyer.

One Roof sells the developed housing using the Community Land Trust model. In the CLT model, the homebuyer owns the improvements (house/buildings) on the land, and One Roof, as the CLT, owns the land underneath, which it leases to the homebuyer. One Roof retains ownership of the land to assure the housing is resold perpetually as affordable housing to low-income homebuyers.

The homebuyer obtains a first mortgage from a financial institution of their choice, subject to the Consortium's homebuyer underwriting and responsible lending policies, and also signs a HOME Program written agreement, the CLT Homebuyer Agreement, held by St. Louis County as lead entity and fiscal agent for the Consortium. The CLT Homebuyer Agreement contains the following required provisions:

- Occupancy of the housing as the homebuyer's principal place of residence, for at least the HOME period of affordability.
- Subsequent sale of the housing to another low-income homebuyer at a price consistent with this resale policy.

The CLT model requires use of resale guidelines rather than recapture guidelines to fulfill requirements of the HOME Program Rule described in 24 CFR 92.254 (a) (5) (i). St. Louis County will review and approve the One Roof Land Lease document to assure its compliance with the HOME Program.

## **Definitions**

The Consortium defines "affordable to a reasonable range of low-income homebuyers" as a family whose income is between 60 to 80 percent (60% - 80%) of area median income for the county of residence as defined by HUD for the HOME Program, based on affordable front ratios for housing cost of 31 percent (31%). Housing cost includes principal, interest, property taxes, and insurance.

The Consortium defines "fair return on investment" for CLT homebuyers as the CLT Purchase Option Price, which provides for return of the original investment, plus 25% of the appreciation in price determined by appraisal and the appraised value of additional capital improvements by the homebuyer.

- 1. One Roof must sign a Declaration of Covenants and Restrictions to impose the Northeast Minnesota HOME Consortium requirements, including these Resale Guidelines. The Declaration is filed with the appropriate county recording authority as evidence of the lien on the housing.
- 2. The homebuyer must sign a CLT Homebuyer Agreement payable to St. Louis County to acknowledge the Subsidy provided to the housing being purchased and to acknowledge understanding of the resale requirements. The Declaration of Covenants and Restrictions is an Exhibit to the CLT Homebuyer Agreement.
- 3. HOME Program Regulations at 24 CFR 92.254 require a minimum affordability period be imposed on the assisted housing according to the following table:

Amount of HOME Assistance	Period of Affordability
Under \$15,000	5 Years
\$15,000 - \$40,000	10 Years
Over \$40,000	15 Years

The total amount of the HOME funding provided to a housing unit will be considered the "Subsidy" in determining the period of affordability required to comply with the HOME Program Rule.

The affordability period for each written agreement will be in compliance with the minimum period established in this section and according to the following terms:

- 1. The CLT Homebuyer agrees to occupy the housing as the CLT Homebuyer's principal residence and homestead for the minimum affordability period required in this section. The period of affordability starts on the date the CLT Homebuyer Agreement is signed.
- 2. If the housing or any interest in it is transferred by the CLT Homebuyer within the required HOME period of affordability, the following applies:
  - a. Under the terms of the CLT Land Lease, the CLT Homebuyer may sell the housing at a price that is consistent with this resale policy to another low-income family as defined by the HOME Program who will agree to occupy the housing as their principal residence for the remainder of the HOME period of affordability. The resale is subject to the approval of the CLT and the County.
  - b. As permitted by statute and as provided in the CLT Land Lease, the CLT may exercise its Option to Purchase at the Purchase Option Price or its Right of First Refusal in order to ensure resale to a low-income buyer.
  - c. If the CLT does not exercise its rights, St. Louis County may purchase the improvements at the Resale Price described in this policy in order to preserve affordability, as described below.

- 3. Upon the CLT Homebuyer's completion of the required HOME affordability period in compliance with the HOME Program regulations, the HOME Subsidy will be forgiven, the Declaration of Covenants and Restrictions will be satisfied, and the HOME Program affordability requirements of the CLT Homebuyer Agreement and the federal HOME regulations at 24 CFR 92 will have been met. The HOME affordability period is calculated from the date of transfer to the homebuyer.
- 4. HOME Program affordability restrictions may be terminated by a lender upon foreclosure, transfer in lieu of foreclosure, and assignment of FHA mortgage, in order to clear title.

The Resale Price Calculation section below provides an example of the resale calculation.

## Noncompliance Requirements

If the Borrower fails to occupy the Housing as their principal residence and homestead for the required affordability period, legal action will be taken to enforce occupancy or resale of the Housing as required in these guidelines. Full repayment of the Subsidy will be required should legal action fail to result in compliance with these guidelines.

## Preservation of Affordable Housing

To preserve the affordability of HOME-assisted housing, St. Louis County may use additional HOME funds for the following costs:

- 1. The cost to acquire the housing through a purchase option, right of first refusal, or other preemptive right before foreclosure, or at the foreclosure sale.
- 2. The cost to undertake any necessary rehabilitation for the housing acquired.
- 3. The cost of owning/holding the housing pending resale to another homebuyer.
- 4. The cost to assist another low-income homebuyer in purchasing the housing, consistent with County HOME homebuyer policies.

Any additional investment will be treated as an amendment to the original HOME investment in determining the required affordability period.

### Resale Price Calculation and Reasonable Return to the Homebuyer

The maximum resale price shall not exceed the homebuyer's base price, as stated below, plus 25% of the increase in market value of the housing and leased land, if any, plus 100% of the value of capital improvements (defined below), if any, calculated in the way described below.

<u>Homebuyer's Base Price</u>: The homebuyer's base price is established upon the date of closing. The base price is the subsidized price paid by the homebuyer including any first mortgage loan.

<u>Initial Appraised Value</u>: The appraised value of the housing and leased land (the "Initial Appraised Value") is documented by the appraiser's report competed at the time of purchase.

<u>Increase in Market Value</u>: The increase in market value of the housing and leased land equals the appraised value of the housing and leased land at time of sale ("Current Appraised Value"), minus the Initial Appraised Value. The One Roof Land Lease requires establishing separate values for the housing as initially purchased and as improved by the homebuyer.

<u>Homebuyer's share of Increase in Market Value</u>: The homebuyer's share of the increase in the market value of the home and leased land equals twenty-five percent (25%) of the increase in market value as calculated above.

<u>Value of Capital Improvements</u>: The homebuyer's share of the value of any capital improvements, as determined by a duly licensed appraiser, equals one hundred percent (100%).

<u>Summary of Formula Price</u>: The resale price equals homebuyer's base price plus homebuyer's share of increase in market value, plus the value of the homebuyer's capital improvements.

Example:

Base Price:	\$125,000
Initial Appraised Value:	\$150,000
Current Appraised Value:	\$175,000
Increased Market Value:	\$25,000
Homebuyer's Share (25%):	\$6,250
Homebuyer Capital Improvements:	\$5,000
Resale Price:	\$125,000 + 6,250 + 5,000 = \$136,250
Return to Homebuyer:	\$136,250 less payoff of homebuyer liens and closing costs

## St. Louis County Emergency Shelter Grant Program ESG Performance Standards

ESG funds are intended to fill gaps in the homeless services continuum. St. Louis County is particularly interested in meeting the needs of singles, families and unaccompanied youth who would benefit from a greater level of service and rental assistance than is possible under other programs and services.

The following ESG performance standards for evaluation were developed in consultation with the St. Louis County Continuum of Care Leadership Council and agencies receiving fund through the Continuum. The standards will be reviewed and revised annually through this same process.

## **Rapid Re-housing Outcomes**

- Participants will be re-housed into stable housing within 30 days of eligibility determination for services
  - Participants receiving rapid re-housing will not become homeless during services or within six months of case closing

Source of evaluation data: HMIS reports

## **Homelessness Prevention Outcomes**

- Eligible renter households will not become homeless
- Homeless families, adults, and youth will retain stable, permanent housing
- Households receiving services will not become homeless during the six months following case closing

Source of evaluation data: HMIS reports

## Termination of the Subrecipient ESG Written Agreement

- Either party may terminate this Agreement at any time, without cause, in whole or in part, by giving written notice to the other party of such termination and specifying the effective date thereof at least 30 days before the effective date of such termination
- The parties may terminate this Agreement, in whole or in part, at any time by mutual written consent specifying the effective date of such termination
- The County may terminate this Agreement, in whole or in part, with ten days written notice to the Subrecipient if the Subrecipient materially fails to comply with any term of this Agreement, or if reasonable progress has not been made by the Subrecipient in accomplishing the purposes of this Agreement
- The County may terminate this Agreement immediately, in whole or in part, if the County is in receipt of a notice of loss of federal funding for the Emergency Solutions Grant Program. The Subrecipient will be notified as soon as possible
- In the event of any termination, all unused grant funds held by the Subrecipient will be returned to the County. All finished or unfinished documents, data, studies, surveys, maps, models, photographs, reports or other materials prepared by the Subrecipient under this Agreement will, at the option of the County, become the property of the County. The Subrecipient will be entitled to receive just and equitable compensation for any satisfactory work completed on such documents or materials
- Any decision to terminate will be made on behalf of the County by the County Planning and Community Development Director who will execute any agreement or notice to terminate

## Written Standards for Provision of ESG Assistance In St. Louis County

- 1. Standard policies and procedures for evaluating individuals' and families' eligibility for assistance under ESG
  - a. St. Louis County does not prioritize who is served with ESG. Clients are served as received.
  - b. <u>Per 24 CFR 576.401</u>: ESG subrecipients must conduct an initial evaluation to determine each individual or family's eligibility for ESG assistance and the amount and types of assistance the individual or family needs to regain stability in permanent housing. All ESG subrecipients will follow federal documentation guidelines to establish the client's status as homeless or atrisk of homeless and their income eligibility. These evaluations must be conducted in accordance with the centralized or coordinated assessment requirements set forth under §576.400(d).
    - i. The St. Louis County Continuum of Care, CoC, has developed a common assessment tool used by all agencies that receive ESG, CoC, and other sources of homeless program funding. The tool creates consistency in client assessment at intake and provides basis for appropriate agency referral.
    - ii. ESG subrecipients must re-evaluate the program participant's eligibility and the types and amounts of assistance the participant needs;
      - 1. Not less than once every 3 months for participants who are receiving homelessness prevention assistance, and
      - 2. Not less than once annually for participants who are receiving rapid re-housing assistance.
    - iii. At the subrecipient's discretion, re-evaluations may be conducted more frequently than required by 24 CFR 576.401 and may also be incorporated into the case management process which must occur not less than monthly for homeless prevention and rapid re-housing participants – See 24 CFR 576.401(e) (i). Regardless of which timeframe is used, re-evaluations, must at minimum, establish that:
      - The program participant does not have an annual income that exceeds 30 percent of median family income for the area, as determined by HUD; and the program participant lacks sufficient resources and support networks necessary to retain housing without ESG assistance. To determine if an individual or family is income eligible, the subrecipient must examine an individual or family's annual income to ensure that it does not exceed the most current HUD income limits applicable to St. Louis County. Note: Annual income must be below 30% at the time of the initial evaluation.

- 2. When the program participant's income or other circumstances change, such as change in household composition, that affects the program participant's need for assistance under ESG, the subrecipient must re-evaluate the program participant's eligibility and the amount and types of assistance the program participant needs.
- iv. Subrecipients must assist each program participant, as needed, to obtain appropriate supportive services, including assistance in obtaining permanent housing, medical health treatment, mental health treatment, counseling, supervision, and other services essential for achieving independent living; housing stability case management; and other Federal, State, local, or private assistance available to assist the program participant in obtaining housing stability including:
  - 1. Medicaid
  - 2. Supplemental Nutrition Assistance Program
  - 3. Women, Infants and Children (WIC)
  - 4. Federal-State Unemployment Insurance Program
  - 5. Social Security Disability Insurance (SSDI)
  - 6. Supplemental Security Income (SSI)
  - 7. Child and Adult Care Food Program,
  - 8. Minnesota Family Investment Program (MFIP),
  - 9. General Assistance Program (GA), and
  - 10. Other mainstream resources such as housing, health, social services, employment, education services and youth programs that an individual or family may be eligible to receive

# 2. Standards for targeting and providing essential services related to street outreach

- a. St. Louis County does not target ESG funding to geographic areas or client populations. ESG subrecipients are selected through a request for proposal process based on service provision. No duplication of service by subrecipient is anticipated in the St. Louis County area of operation.
- b. ESG funding 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 24 CFR Part 576.2. As outlined in 24 CFR Part 576.101, essential services consist of:
  - i. Engagement;
  - ii. Case management;

- iii. Emergency health services only when other appropriate health services are inaccessible or unavailable within the area;
- iv. Emergency mental health services only when other appropriate mental health services are inaccessible or unavailable within the area;
- v. Transportation; and
- vi. Services for special populations.
- c. ESG subrecipients must determine an individual's or family's vulnerability and unwillingness or inability to access emergency shelter, housing, or an appropriate health facility, prior to providing essential services under this component to ensure that ESG funding is used to assist those with the greatest need for street outreach assistance.

# 3. Policies and procedures for admission, diversion, referral, and discharge by emergency shelters

- a. Emergency Shelter Definition: The term Emergency Shelter was revised by 24 CFR Part 576.2 to mean "any facility, the primary purpose of which is to provide a temporary shelter for the homeless in general or for specific populations of the homeless and which does not require occupants to sign leases or occupancy agreements. This definition excludes transitional housing. However, projects that were funded as an emergency shelter (shelter operations) under the FY 2010 Emergency Shelter Grants program may continue to be funded under the emergency shelter component under the Emergency Solutions Grants program, regardless of whether the project meets the revised definition.
- b. Admission, Diversion, Referral and Discharge

Shelter stays should be avoided, if possible, and when not possible, limited to the shortest time necessary to help participants regain permanent housing. Consistent with Section (a) of this document, ESG subrecipients must conduct an initial evaluation of all individuals or families to determine if they should be admitted to an emergency shelter, diverted to a provider of other ESG-funded components, such as rapid re-housing or homeless prevention assistance, or referred for other mainstream resources.

- c. ESG subrecipients must determine that individuals and families meet category (1), (2), (3), or (4) of the Homeless Definitions listed below and rate the individual's or family's vulnerability to ensure that only those individuals or families that have the greatest need for emergency shelter assistance receive ESG funded assistance.
  - i. Category 1 Literally Homeless
  - ii. Category 2 Imminent Risk of Homeless
  - iii. Category 3 Homeless Under Other Federal Statutes
  - iv. Category 4 Fleeing/Attempting to Flee DV

- d. ESG subrecipients must also reassess emergency shelter participants, on an ongoing basis, to determine the earliest possible time that they can be discharged to permanent housing. All persons discharged from emergency shelters will have their exit status entered into either HMIS and will be provided discharge paperwork as applicable or upon request.
- e. Safety and Shelter Needs of Special Populations
  - i. ESG funding 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 the regulations for the emergency shelter component found at 24 CFR Part 576.102.
  - ii. Consistent with ESG recordkeeping and reporting requirements found at 24 CFR Part 576.500, ESG subrecipients must develop and apply written policies to ensure the safety of program participants through the following actions:
    - All grantees and sub-grantees will take appropriate measures to provide for client confidentiality. Grantees and sub-grantees will develop and implement procedures to guarantee the confidentiality of records concerning program participants. All records containing personally identifying information (as defined in HUD's standards for participation, data collection, and reporting in a local HMIS) of any individual or family who applies for and receives ESG assistance will be kept secure and confidential.
    - 2. The address or location of any domestic violence, dating violence, sexual assault, or stalking shelter project assisted under the ESG will not be made public, except with written authorization of the person responsible for the operation of the shelter, and
    - 3. The address or location of any housing of a program participant, including youth, individuals living with HIV/AIDS, victims of domestic violence, dating violence, sexual assault, and stalking; and individuals and families who have the highest barriers to housing will not be made public, except as provided under a preexisting privacy policy of the subrecipient and consistent with state and local laws regarding privacy and obligations of confidentiality
  - iii. In addition, ESG subrecipients must adhere to the following ESG shelter and housing standards found at 24 CFR Part 576.403 to ensure that shelter and housing facilities are safe, sanitary, and adequately maintained:

- Lead-Based Paint Requirements. The Lead-Based Paint Poisoning Prevention Act applies to all shelters assisted under ESG program and all housing occupied by program participants. All ESG subrecipients are required to conduct a Lead-Based Paint inspection on all units receiving assistance under the rapid re-housing AND homelessness prevention components if the unit was built before 1978 and a child under age of six or a pregnant woman resides in the unit.
- 2. <u>Structure and Materials.</u> The shelter building should be structurally sound to protect residents from the elements and not pose any threat to health and safety of the residents.
- 3. <u>Access.</u> The shelter must be accessible, and there should be a second means of exiting the facility in the case of emergency or fire.
- 4. <u>Space and Security.</u> Each resident should have adequate space and security for themselves and their belongings. Each resident must have an acceptable place to sleep.
- 5. <u>Interior Air Quality.</u> Each room or space within the shelter/facility must have a natural or mechanical means of ventilation. The interior air should be free of pollutants at a level that might threaten or harm the health of residents.
- 6. <u>Water Supply.</u> The shelter's water supply should be free of contamination.
- 7. <u>Sanitary Facilities.</u> Each resident should have access to sanitary facilities that are in proper operating condition. These facilities should be able to be used in privacy, and be adequate for personal cleanliness and the disposal of human waste.
- 8. <u>Thermal Environment.</u> The shelter/facility must have any necessary heating/cooling facilities in proper operating condition.
- 9. <u>Illumination and Electricity.</u> The shelter/facility should have adequate natural or artificial illumination to permit normal indoor activities and support health and safety. There should be sufficient electrical sources to permit the safe use of electrical appliances in the shelter.
- 10. <u>Food Preparation.</u> Food preparation areas, if any, should contain suitable space and equipment to store, prepare and serve food in a safe and sanitary manner.
- 11. <u>Sanitary Conditions.</u> The shelter should be maintained in a sanitary condition.
- 12. <u>Fire Safety-Sleeping Areas.</u> There should be at least one working smoke detector in each occupied unit of the shelter facility. In addition, smoke detectors should be located near sleeping areas where possible. The fire alarm system should be designed for a hearing-impaired resident.

13. <u>Fire Safety-Common Areas.</u> All public areas of the shelter must have at least one working smoke detector.

- 4. Policies and procedures for assessing, prioritizing, and reassessing individuals' and families' needs for essential services related to emergency shelter
  - a. The St. Louis County Continuum of Care, CoC, has developed a common assessment tool used by all agencies that receive ESG, CoC, and other sources of homeless program funding. The tool creates consistency in client assessment at intake and provides basis for appropriate agency referral.
  - b. Upon completion of the common assessment, ESG subrecipients use that system to help determine an individual or families need for emergency shelter or other ESG-funded assistance.
  - c. ESG funding may be used to provide essential services to individuals and families who are in an emergency shelter. Essential services for participants of emergency shelter assistance can include case management, child care, education services, employment assistance and job training, outpatient health services, legal services, life skills training, mental health services, substance abuse treatment services, transportation, and services for special populations.
  - d. ESG subrecipients are responsible to assess an individual or family's initial need for emergency shelter and must re-assess their need on an ongoing basis to ensure that only those individual or families with the greatest need receive ESG-funded emergency shelter assistance. Shelters that serve families must serve all eligible families and may not refuse services based on the age of children or the size of the family.
  - e. Client re-assessment will take place at the participant level and at the service provider level. Clients meet with case managers throughout their participation in the program, and have regular progress evaluations. Clients have opportunity to provide assessment and feedback of programs as well.
  - f. The St. Louis County Continuum of Care has an ongoing system for program and service evaluation and improvement through the Heading Home Leadership Council, Affordable Housing Coalition, and Rural Housing Coalition. These meetings of case managers, administrative staff, and County staff create forums for program discussion, evaluation, and improvement. Agencies participating in the St. Louis County Continuum of Care share best practices in client service provision and refine service delivery based on feedback from CoC participants and clients.

- 5. Policies and procedures for coordination among emergency shelter providers, essential service providers, homelessness prevention and rapid re-housing assistance providers, other homeless assistance providers, and mainstream service and housing providers
  - a. Coordination to assist the homeless and prevent homelessness comes through collaboration among the Heading Home Leadership Council, St. Louis County Continuum of Care service providers, Rural Housing Coalition, Affordable Housing Coalition, and staff of St. Louis County and Duluth. Active engagement in the CoC and Rural or Affordable housing coalition is strongly encouraged.
- 6. Policies and procedures for determining and prioritizing which eligible families and individuals will receive homelessness prevention assistance and which eligible families and individuals will receive rapid re-housing assistance
  - a. ESG-funded agencies will be responsible for ensuring that potential participants are served in order of contact, with provisions for priority service for eligible households who meet priority criteria set forth by the agency.
  - b. The key to the success of the continuum of care strategy is in the common screening and assessment process developed by the St. Louis County Continuum of Care. Screening and assessment thoroughly explores a family's or individual's situation and pinpoints their unique housing and service needs. Based upon the assessment, families and individuals should be referred to the kinds of housing and services most appropriate to their situations and need.
  - c. The common assessment tool aids matching individuals and families with the most appropriate assistance. Under homelessness prevention assistance, funding is available to individuals and families below 30% of Area Median Income (AMI), and are homeless or at risk of becoming homeless.
  - d. ESG funding can be used to prevent an individual or family from becoming homeless and regain stability in current housing or other permanent housing. Rapid re-housing funding is available to aid those who are literally homeless progress toward permanent housing and achieve housing stability.
    - i. Homeless Prevention Households will be re-certified for continued eligibility every 3 months.
    - ii. Rapid Re-Housing Households will be re-certified annually.
- 7. Standards for determining the share of rent and utilities costs that each program participant must pay, if any, while receiving homelessness prevention or rapid re-housing assistance
  - a. Standards for both homelessness prevention and rapid re-housing for determining the share of rent and utilities costs that each program participant must pay, if any, will be based on the following:

- i. Clients receiving rental assistance are expected to contribute 30% of their income toward the unit's rent. The St. Louis County ESG Program does not require a minimum client contribution.
- ii. Rental assistance cannot be provided for a unit unless the rent for that unit is at or below the current Fair Market Rent limit, established by HUD.
- iii. The rent charged for a unit must be reasonable in relation to rents currently being charged for comparable units in the private unassisted market and must not be in excess of rents currently being charged by the owner for comparable unassisted units. See 24 CFR 574.320.
- iv. The rental unit must meet minimum habitability standards found at 24 CFR 576.403.
- v. There must be a rental assistance agreement and lease between the property manager and tenant as well as the owner of property and ESG subrecipient.
- vi. No rental assistance may be made to an individual or family that is receiving rental assistance from another public source for the same time period.
- vii. Rental assistance may not be provided to a participant who is currently receiving replacement housing payments under Uniform Relocation Assistance
- b. Per 24 CFR 576.106 (e), ESG subrecipients may make rental assistance payments only to an owner with whom the 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 give the 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.

# 8. Standards for determining how long a particular program participant will be provided with rental assistance and whether and how the amount of that assistance will be adjusted over time

- a. Subject to the general conditions under 24 CFR 576.103 and 24 CFR Part 576.104, ESG subrecipients 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.
- b. Short-term rental assistance is assistance for up to 3 months of rent. Mediumterm rental assistance is assistance for more than 3 months but not more than 24 months of rent. Payment of rental arrears may consist of a one-time payment for up to 6 months of rent in arrears, including any late fees on those arrears.

- c. The maximum amount of rental assistance provided and, an individual or family's level of responsibility for rent payments, over time, shall be determined by the ESG subrecipient and shall be reflective of the individual or family's need for rental assistance and the level of financial resources available to the ESG subrecipient.
- d. Rental assistance will end if and when other subsidy begins, such as Section 8 Housing Choice Voucher, public housing, or project based rental subsidy.
- e. Guidance from the Heading Home Leadership Council, Affordable Housing Coalition, and Rural Housing Coalition will aid with evaluation and modification of rental assistance based on community need, outcomes, and available budget within the HUD guidelines.
- 9. Standards for determining the type, amount, and duration of housing stabilization and relocation services to provide a program participant, including the limits, if any, on the homelessness prevention or rapid rehousing assistance that each program participant may receive, such as the maximum amount of assistance, maximum number of months the program participants receives assistance; or the maximum number of times the program participants may receive assistance
  - a. Subject to the general conditions under 24 CFR 576.103 and 24 CFR Part 576.104, subrecipients may use ESG funding to pay housing owners, utility companies, and other third parties for some or all of the following costs, as allowed under 24 CFR 576.105:
    - i. Rental application fees
    - ii. Security deposits
    - iii. Last month's rent
    - iv. Utility deposits
    - v. Utility payments
    - vi. Moving costs, and
    - vii. Some limited services costs
  - b. Consistent with 24 CFR 576.105 (c), ESG subrecipients determine the type, maximum amount and duration of housing stabilization and relocation services for individuals and families who are in need of homeless prevention or rapid re-housing assistance through the initial evaluation, re-evaluation and ongoing case management processes.
  - c. Consistent with 24 CFR 576.105(d), financial assistance for housing stabilization and relocation services 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 Uniform Relocation Act (URA) during the period of time covered by the URA payments.

## 10. Standards for terminating ESG assistance to program participants.

The Emergency Solutions Grant Program (ESG) regulations at 24 CFR 576.402 require recipients (St. Louis County) or subrecipients (ESG-funded agencies) to establish guidelines and procedures for terminating assistance to program participants. St. Louis County provides the following guidance for its ESG Program. Subrecipient agencies may adopt this guidance or develop their own policy and procedures provided it meets the following minimum requirements and does not limit participant rights pursuant to this guidance. Agency policy will be submitted annually to St. Louis County with ESG contracts.

In all cases of termination or grievance, reasonable accommodation will be made to assist participants with physical or other disability including providing sign language interpreters, readers, accessible locations, or attendants.

## **Termination Guidelines and Procedures**

## <u>Guidelines:</u>

Participants receiving financial assistance or case management services from the St. Louis County ESG Program agree to abide by the federal ESG Program requirements. Program participants who fail to comply with the ESG Program requirements may be terminated from the program.

A Program Participant receiving ESG financial assistance or case management services may be terminated for the following reasons:

- 1. Violation of ESG Program requirements
- 2. Ineligibility at recertification
- 3. Fraud or attempted fraud
- 4. Illegal activity

## Procedures:

- 1. Agency ESG case managers will determine if assistance to a participant should be terminated.
  - a. The agency case manager will document the agency client file with the determination and provide documentation for review to the agency program supervisor.
  - b. After review and approval by the agency program supervisor, notice will be provided to the participant and include the reason for termination and the date of termination. The participant notice must also include their right to appeal the decision and the process to follow.
    - i. Participants receiving only case management services will be provided notice at least 15 days prior to the termination date.
    - ii. Participants receiving ESG rental assistance or housing relocation and stabilization services will be provided termination dates subject to requirements in the lease for the assisted unit.

- c. Participant notice may be given by telephone or in person and must also be provided in writing by hand delivery or postal mail. A copy of the written notice will be retained in the agency client file.
- 2. Agency case managers will recertify the eligibility of ESG participants every three months.
  - a. Failure to meet ESG Program requirements at re-certification will result in participant termination from the ESG Program.
    - i. Participants receiving only case management services will be provided notice at least 15 days prior to the termination date.
    - ii. Participants receiving ESG rental assistance or housing relocation and stabilization services will be provided termination dates subject to requirements in the lease for the assisted unit.
  - b. Participant notice may be given by telephone or in person and must also be provided in writing by hand delivery or postal mail. The participant notice must also include their right to appeal the decision and the process to follow. A copy of the written notice will be retained in the agency client file.
- 3. Participants who are suspected of committing fraud, attempted fraud, or illegal activity will be reported to the appropriate authorities. Immediate termination will occur upon completion of due process to verify the fraud, attempted fraud, or illegal activity.
  - a. Notice of suspected violation may be given by telephone or in person and must also be provided in writing by hand delivery or postal mail. A copy of the written notice will be retained in the agency client file.
  - b. Notice of immediate termination will be provided upon completion of due process to verify the violation. The participant notice must also include their right to appeal the decision and the process to follow.
- 4. If reason for termination is violation of program requirements, the participant may work with the case manager to resolve the violation issue.
- 5. A participant may reapply for ESG assistance at a later date depending upon the circumstances under which participation in the ESG Program was terminated.
- 6. If a program participant disagrees with the decision to terminate, the participant may appeal the decision by following the grievance procedures in the following section.

## **Grievance/Appeal Guidelines and Procedures**

### Guidelines:

Participants receiving ESG assistance will have the right to express grievances with the guidelines and procedures of the ESG Program and to appeal actions or inactions of the agency providing ESG financial assistance or services.

#### Procedures:

- 1. If the participant has a grievance, initial discussion should occur with the case manager at the agency from which the participant receives financial assistance or services.
- 2. If after discussing the grievance with the case manager, the participant is not satisfied with the result; or in cases where the case manager is a party to the grievance, the participant should speak to the program supervisor at the agency from which the participant is receiving financial assistance or services.
- In cases where the grievance cannot be resolved by the agency program supervisor or case manager, the St. Louis County ESG Program Coordinator will be involved in the resolution.
  - a. Program participants must contact the ESG Program Coordinator by phone, email or in writing after failure to resolve a grievance to request a review conference.
  - b. Upon receipt of a request for a conference, the ESG Program Coordinator will consult with the agency providing services and notify the program participant within five business days of the date, time, and place of the conference. The ESG Program Coordinator and appropriate St. Louis County staff persons will meet privately with the program participant.
  - c. A written summary of the conference discussion and written decision of the ESG Program Coordinator will be prepared within two weeks; one copy will be given to the participant, one copy will be retained in the agency participant's file, and a copy retained by the ESG Program Coordinator.
  - d. If the issue involves a case manager and the determination restores the participant to eligibility, the participant will be assigned to a different case manager.