



Saint Louis County



2020 – 2024

Consolidated Plan

**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

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

1. Introduction

The St. Louis County Consolidated Plan is an application and strategy statement to the U.S. Department of Housing and Urban Development (HUD) addressing the county's housing and community development needs. The St. Louis County Consolidated Plan is a new five-year strategy covering the program years of 2020-2024. The FY 2020 Action Plan is incorporated into the document. 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 entitlement programs:

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

The 2020-2024 Consolidated Plan five-year strategy updates the county's previous five-year strategy issued in 2015 covering program years 2015-2019. The plan is a statement of how the county intends to spend its HUD entitlement funds in the area of housing and community development. Priorities are set in accordance with HUD directives.

The FY 2020 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 2020 program year. The county's annual program year for Consolidated Plan purposes runs from May 1 – April 30.

The area served under the St. Louis County CDBG and ESG program is all of St. Louis County excluding the city of Duluth. 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 the city of Duluth). The city of Duluth receives a separate entitlement allocation from HUD.

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

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 disabilities.
- **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

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 277 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 67 low-moderate income families
- Assisted with the rehabilitation of 195 affordable rental units
- Expanded economic opportunities through technical assistance and training to 73 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

St. Louis County conducted outreach through public hearings, community meetings, online and printed surveys, focus groups, and attendance at various regional housing, economic development and human service provider meetings.

5. Summary of public comments

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 through public forums/focus groups, citizen surveys and public hearings. St. Louis County utilized 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.

The Process

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

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

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	ST. LOUIS COUNTY	Planning and Community Development Department
HOME Administrator	ST. LOUIS COUNTY	Planning and Community Development Department
ESG Administrator	ST. LOUIS COUNTY	Planning and 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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PR-10 Consultation - 91.100, 91.110, 91.200(b), 91.300(b), 91.215(I) and 91.315(I)

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)).

The 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's 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 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 County's Public Health and Human Services Department and the County's 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's Ten Year 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 and evaluate outcomes, and develop funding, policies and procedures for the 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, 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. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	MINNESOTA HOUSING FINANCE AGENCY
	Agency/Group/Organization Type	Housing Other government - State
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Minnesota Housing Finance Agency creates annual community profiles that display demographic, financial, and rental and home owner housing market information. The agency also provides funding for home ownership and rental 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	Housing Other government - Federal
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	St. Louis County regularly interacts with Rural Development through mutual home ownership assistance programs. Rural Development is a frequent provider of the first mortgage on activities assisted with the Consortium Home Ownership 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.

3	Agency/Group/Organization	MN Dept. of Iron Range Resources & Rehabilitation
	Agency/Group/Organization Type	Housing Other government - State Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Minnesota Department of Iron Range Resources and Rehabilitation (IRRR) held a forum on 6/5/2019 to present financial and technical assistance resources available to communities in the region. County Planning Department staff persons participated in the forum and presented CDBG, HOME, and ESG Program information along with gaining input from communities and agencies in attendance.
4	Agency/Group/Organization	DULUTH
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The 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.
5	Agency/Group/Organization	Iron Range Economic Alliance (IREA)
	Agency/Group/Organization Type	Regional organization Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Economic Development

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The 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.
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
	How was the Agency/Group/Organization consulted and 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.
7	Agency/Group/Organization	ARROWHEAD ECONOMIC OPPORTUNITY AGENCY (AEOA)
	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 Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	AEOA is a community action agency covering seven counties in northeastern Minnesota. The agency delivers housing programs and homelessness services funded by St. Louis County. Agency staff members also participate in regional planning efforts, including the St. Louis County and Northeast MN Continuums of Care. AEOA additionally provides planning services to local communities and agencies.
8	Agency/Group/Organization	KOOTASCA COMMUNITY ACTION, INC.
	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 Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Non-Homeless Special Needs Market Analysis

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	KOOTASCA is a community action agency covering two counties in northeastern Minnesota. The agency delivers housing programs and homelessness services funded by St. Louis County. Agency staff members also participate in regional planning efforts, including the Northeast MN Continuum of Care. KOOTASCA additionally provides planning services to local communities and agencies.
9	Agency/Group/Organization	Cook HRA
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Public Housing Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	A questionnaire was postal mailed to the HRA requesting responses to areas of the Consolidated Plan dedicated to PHA assessment and needs.
10	Agency/Group/Organization	Gilbert HRA
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Public Housing Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	A questionnaire was postal mailed to the HRA requesting responses to areas of the Consolidated Plan dedicated to PHA assessment and needs.
11	Agency/Group/Organization	International Falls HRA
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Public Housing Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	A questionnaire was postal mailed to the HRA requesting responses to areas of the Consolidated Plan dedicated to PHA assessment and needs.
12	Agency/Group/Organization	Itasca County HRA
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Public Housing Needs

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	A questionnaire was postal mailed to the HRA requesting responses to areas of the Consolidated Plan dedicated to PHA assessment and needs.
13	Agency/Group/Organization	Virginia HRA
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Public Housing Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	A questionnaire was postal mailed to the HRA requesting responses to areas of the Consolidated Plan dedicated to PHA assessment and needs.
14	Agency/Group/Organization	Greater MN Housing Fund (GMHF)
	Agency/Group/Organization Type	Housing Community Development Financial Institution Foundation
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Families with children
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Greater MN Housing fund participates in the annual Request for Proposals (RFP) process run by the Minnesota Housing Finance Agency. Interaction and consultation is achieved through participation in RFP training.
15	Agency/Group/Organization	Chisholm HRA
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Public Housing Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	A questionnaire was postal mailed to the HRA requesting responses to areas of the Consolidated Plan dedicated to PHA assessment and needs.
16	Agency/Group/Organization	Eveleth HRA
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Public Housing Needs

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	A questionnaire was postal mailed to the HRA requesting responses to areas of the Consolidated Plan dedicated to PHA assessment and needs.
17	Agency/Group/Organization	Grand Rapids HRA
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Public Housing Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	A questionnaire was postal mailed to the HRA requesting responses to areas of the Consolidated Plan dedicated to PHA assessment and needs.
18	Agency/Group/Organization	Hibbing Housing and Redevelopment Authority
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Public Housing Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	A questionnaire was postal mailed to the HRA requesting responses to areas of the Consolidated Plan dedicated to PHA assessment and needs.
19	Agency/Group/Organization	Koochiching County HRA
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Public Housing Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	A questionnaire was postal mailed to the HRA requesting responses to areas of the Consolidated Plan dedicated to PHA assessment and needs.
20	Agency/Group/Organization	One Roof Community Housing
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment

	How was the Agency/Group/Organization consulted and 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. Community Development staff persons met with the One Roof Executive Director and Land Trust Manager on 9/23/2019.
21	Agency/Group/Organization	Senator Tina Smith
	Agency/Group/Organization Type	Community Forum
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Non-Homeless Special Needs Economic Development Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Staff of Senator Tina Smith's Office (Minnesota) held a community meeting at a local agency to gather input to housing and homelessness issues. The forum brought together housing and service provider agencies and local government representatives. The dialog will aid the Senator with legislative positions and aided locally with identification of priorities and areas of potential inter-agency collaboration.
22	Agency/Group/Organization	We Are All Criminals
	Agency/Group/Organization Type	Non-profit advocacy organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Anti-poverty Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	We Are All Criminals is a non-profit organization dedicated to challenging society perceptions of what it means to be a criminal. Through shared stories of those who committed or were accused of committing crimes, those who got away with them, and those who have been directly affected by the criminal justice system, we seek to erase the barriers that separate us. These barriers affect housing and employment opportunities. St. Louis County Community Development was a sponsor of a local presentation by We Are All Criminals. The discussion following provided input to housing issues within the Consolidated Plan.
23	Agency/Group/Organization	St. Louis County Association of Townships
	Agency/Group/Organization Type	Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development Market Analysis community services
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The St. Louis County Association of Townships meets 6 times per year in various locations throughout St. Louis County. The meetings provide a forum for discussion of shared community issues. Community Development staff persons attended a meeting on 12/4/2019 to present information about the CDBG, HOME, and ESG Programs and to request input to the Consolidated Plan process.

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

No agencies types were excluded from the consultation process. Contact was made with all twelve public housing authorities in the County and Consortium but only five responded with information.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	St. Louis County Public Health and Human Services	Priorities of the Continuum of Care are shared with the advisory committees for the CDBG and HOME programs. The ESG funding recommendations are reviewed through the CoC process.
Continuum of Care-2	Northeast Minnesota CoC Plan-AEOA	Priorities of the Continuum of Care are shared with the advisory committees for the HOME program. The NE Minnesota Continuum includes the four additional counties in the HOME Consortium - Cook, Itasca, Koochiching, and Lake.
Floodwood Housing Study	City of Floodwood	The Floodwood housing study was conducted in the summer of 2019. It incorporates the communities housing needs and supports findings in the housing market analysis and needs assessment sections of the Con Plan.
Grand Rapids Housing Study	Itasca County Housing Institute Team	The Grand Rapids housing study was conducted in July of 2014 and supports findings in the housing market analysis and needs assessment sections of the Con Plan.
Hibbing Comprehensive Plan	City of Hibbing	The Hibbing comprehensive planning process was undertaken in the fall of 2018 to take inventory of the city assets and opportunities and to gain a better understanding of the city needs and challenges. Its findings contribute to the needs assessments sections of the County Con Plan.
Hoyt Lake Comprehensive Plan	City of Hoyt Lakes	The Hoyt Lakes comprehensive planning process was completed in June 2017. It took inventory of the city assets, issues, and opportunities to provide policy framework the city will use to guide City leaders in future decision making efforts. Its guidance also contributes to the needs assessments sections of the County Con Plan.
Orr Comprehensive Plan	City of Orr	The Orr comprehensive planning process was completed in April 2018 to update the previous plan completed in 2011. The plan addresses housing; transportation; agricultural, natural, and cultural resources; utilities and community facilities; intergovernmental cooperation; land use; and implementation. Its applicable areas contributes to the needs assessment sections of the County Con Plan.

Table 3 – Other local / regional / federal planning efforts

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

Cooperation with other public entities is undertaken through shared data, cooperative application review, and networking meetings.

Narrative

No further discussion.

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

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

The 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 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 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 Leadership Council which makes recommendations to the County Board on the proposed use of ESG funds.

The County and Consortium also used Internet-based surveys, paper surveys, focus groups, and community meetings to create opportunities for input to the Consolidated Plan.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Meeting	HOME Consortium Advisory Committee	4/26/2019 The ten member HOME Consortium Advisory Committee includes a commissioner from the counties of Cook, Itasca, Koochiching, Lake, and St. Louis and a housing advocate from each of these counties. The meeting agenda included approval of prior meeting minutes, review of agency applications, and review of the 2019 budget.	Discussed applications and listened to agency presentations. Based on funding levels and Consortium priorities funding recommendations were made and approved.	All comments were accepted.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Public Meeting	Non-targeted/broad community Cities/townships/non-profits/public	6/5/2019 Department of Iron Range Resources held a Community Development Resource event to educate local cities, townships, non-profits, and public regarding funding sources for their projects.	Discussion of community development funding options presented by many state and local government agencies: IRR, SHPO, DEED, USDA, MN Pollution Control, MN Dep of Health, MN Public Facilities, SLC, and AEOA.	NA	
3	Agency Site Visit	Local agency	6/14/2019 Community Development and Chisholm Food Shelf staff met to discuss agency needs.	Discussed 2020 CDBG process and answered questions regarding intake forms. Given a tour of the facility to better understand the need of the agency.	NA	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4	Public Meeting	Residents of Public and Assisted Housing Persons who are homeless	7/2/2019 Housing Coalition: Housing and homelessness organizations met to discuss housing and emergency assistance options and funding streams.	Discussion of status, challenges, successes with the continuum of care system in north St. Louis County. Additional discussion of the common issues the agencies are facing: landlord screening tenant problems, SS Card requirements, timing of delivery of deposits, and other fees landlords are charging for applications.	All comments were accepted.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
5	Internet Outreach	Non-targeted/broad community	8/28 - 12/30/2019 A broad-based online survey was developed to cover housing, economic development, community facilities and public infrastructure, and public services. The link to the survey was posted on the County's web site, included in email distribution to various groups, and released as a news item by the County's Communication Director to multiple TV & radio stations in the County.	The appendix contains charts showing responses from the online survey.	All comments were accepted.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
6	Internet Outreach	Non-targeted/broad community HOME Consortium counties	8/28 - 12/30/2019 An Internet-based survey was used in the Consortium counties of Cook, Itasca, Koochiching, and Lake to allow housing need input to the Consolidated Plan.	The HOME Consortium survey information is included in the appendix.	All comments were accepted.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
7	Public Hearing	Eligible CDBG applicants & general public	9/10 & 9/12/2020 The County's annual CDBG application process begins with two public hearings conducted in north and south locations of St. Louis County. The meetings include discussion of previous year accomplishments, current year application information, and dialog with attendees about housing, economic development, infrastructure, and public service needs in their communities. The south meeting was held at the Proctor City Hall and Community Center on 9/10/2019 and the north meeting was held at the Iron City Hall and Community Center on 9/12/2019.	Needs listed include: rental and owner-occupied housing rehab, street reconstruction, water/sewer/storm sewer/street infrastructure, demolition of structures, rural private septic systems, and various public services.	All comments were accepted.	
<div> <div>OMB Control No: 2506-0117 (exp. 06/30/2018)</div> <div>Consolidated Plan</div> <div>ST. LOUIS COUNTY</div> </div>						
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Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
8	Agency Site Visit	Chisholm HRA	9/17/2019 Community Development staff and Chisholm HRA staff met to discuss the 2020 CDBG process and the agency's needs.	Discussed how the 2020 CDBG process works and provided guidance on how to complete the CDBG application. Discussed the potential funding sources of his rehab project along with potential other funding sources.	All comments were accepted.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
9	Public Meeting	HOME Consortium Advisory Committee	9/20/2019 The ten member HOME Consortium Advisory Committee includes a commissioner from the counties of Cook, Itasca, Koochiching, Lake, and St. Louis and a housing advocate from each of these counties. The meeting agenda included facilitated discussion of the housing needs in each of the five counties.	Housing responses were categorized by rental and ownership. Common needs include: senior housing options, greater homelessness response, rental rehab and new construction, owner rehab, rural private septic systems, and issues pertaining to VRBOs were discussed.	All comments were accepted.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
10	Public Meeting	Continuum of Care for St. Louis County	9/26/2019 Community Development staff, CoC members, and other non-profits that support housing and homelessness in Northern St. Louis County met to discuss current housing situations in the area along with barriers that need to be overcome.	Discussion of solutions to landlords requiring utility deposits, persons with legal records getting a second chance as it can prevent them from being able to rent.	All comments were accepted.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
11	Agency Site Visit	City of Virginia EDA	10/2/2019 Community Development staff, Virginia EDA members, and Northland Foundation members met to discuss a program to revitalize its downtown district.	The revitalization program intends to combine grant and loan sources for building owners to rehab their buildings including: convert structure use from retail to other, rehab residential rental units in existing or create new rental units, store from renovation, code compliance rehab, and energy efficiency rehab.	All comments were accepted.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
12	Agency Site Visit	City of Chisholm	10/11/2019 Community Development and City of Chisholm staff met to discuss their community needs.	Provided Chisholm staff with application materials and process information for the 2020 CDBG process. Discussed eligibility requirements.	NA	
13	Agency Site Visit	Non-targeted/broad community	10/15/2019 Pre-applications to the 2020 CDBG program were received. Applicant categories cover housing, economic development, community facilities and public infrastructure, and public services. Eligible applicants include cities, townships, and nonprofit agencies.	The pre-apps allow Community Development staff members to review proposed activities for eligibility and provide insight to local community, agency, and resident needs. Staff members contact applicants directly to discuss priorities and to assist with additional sources of leverage.	n/a	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
14	Agency Site Visit	City of Tower	10/29/2019 Community Development staff and City of Tower staff met to discuss their community needs.	Discussed eligibility of potential CDBG projects, how our 2020 CDBG process works, and the need to conduct a community wide survey to be eligible for CDBG funding.	NA	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
15	Public Meeting	We Are All Criminals	11/13/2019 Community Development staff attended a public forum along with 132 other residents, students, CoC members, and others to learn about the barriers that are created after someone goes to jail.	We Are All Criminals looks at people with criminal histories but no record - people who have had the luxury to forget. Real life stories were shared and considered how different their lives would have been had they been caught. Once criminal history is on your record it becomes harder to get a job, rent an apartment, and buy a home.	NA	
16	Agency Site Visit	City of Gilbert	11/14/2019 Community Development staff and City of Gilbert staff met to discuss their community needs.	Discussed eligibility requirements and 2020 CDBG process. Provided guidance on how to complete the applications.	NA	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
17	Public Meeting	Non-targeted/broad community Economic development focused	11/20/2019 The Iron Range Economic Alliance (IREA) is made up of local government representatives, economic development professionals and agencies, consultants, state and regional funding agency representatives, and general interested parties.	Discussion includes current economic conditions, opportunities, and barriers. Service sector jobs are available but not enough workers. Reduced hours and rising health care costs conflict with minimum wage job hiring.	All comments were received.	
18	Agency Site Visit	Local government unit	12/10/2019 Community Development staff members met with the town of Elmer personnel to discuss the needed Amendment to the Joint Cooperation Agreement.	Discussed the reason why we need the Amendment and what it provides to the township and its residents. Discussed potential project to the township fire hall.	All comments were accepted.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
19	Public Meeting	Non-targeted/broad community	12/16/2019 Community Development staff attended a meeting regarding a housing study completed for the City of Grand Rapids and the surrounding communities.	The study outlined the community need for affordable housing for first time home buyers, renters, and the aging population.	NA	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
20	Public Meeting	Non-targeted/broad community	1/8, 1/15, 1/16, & 1/23/2020 The CDBG Citizen Advisory Committee held public meetings to review applications submitted to the 2015 CDBG funding process. All meetings are open to the public. The 1/8 meeting provides citizens an opportunity to hear an overview of all applications. Applicant interviews were conducted 1/15 & 1/16 and were also open to the public. The 1/23 meeting provided an opportunity for public input to the advisory committee's initial funding recommendation. After close of the public input, the Advisory Committee passed its final recommendation that the funding be allocated to the following projects:	Applicant and advisory committee interviews review activity readiness, priority within the community, commitment of other funding sources, and general discussion about local community needs.	All comments were accepted.	

Consolidated Plan

ST. LOUIS COUNTY

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Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
21	Newspaper Ad	Non-targeted/broad community	3/13 - 4/13/2020 Notification of the Plan public review period was made through legal publication in the Duluth News Tribune. Notification was also posted on the St. Louis County Internet site. Paper copies of the Plan were made available at the Planning and Community Development Department offices in Duluth and Virginia. The Plan was also posted to the Planning and Community Development Department Internet web site.			

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
22	Newspaper Ad	Non-targeted/broad community	The St. Louis County Board authorized publication by legal ad of notice of a public hearing on the 2020-2024 Consolidated Plan and the 2020 Action Plan to be conducted on April 14, 2020 at the St. Louis County Courthouse in Duluth, MN.			
23	Newspaper Ad	Non-targeted/broad community	Open house style presentations were held in Proctor (9/10/2019) and Mt. Iron (9/12/2019) to start the 2020 CDBG funding cycle and receive input to community and resident needs.	Broadband service, water/sewer/street infrastructure, homelessness housing and services, housing shortages for low- and moderate-income families	All comments were accepted.	

Table 4 – Citizen Participation Outreach

Needs Assessment

NA-05 Overview

Needs Assessment Overview

St. Louis County solicited input from communities, agencies, and individuals through two online surveys. Due to the large geographic area covered by St. Louis County alone and the much larger area of the HOME Consortium, the online availability of the surveys created greater opportunity for public input. Survey participants were able to directly input their online responses or provide paper response surveys that were input by a Planning and Community Development staff member. The two surveys used were as follows:

- CDBG survey: responses were solicited from communities, agencies, and residents of St. Louis County. General information questions allowed sorting by area of residence. The survey included sections on housing, economic development, community facilities, public infrastructure, and public services.
- HOME Consortium survey: responses were solicited from communities, agencies, and residents of the additional four member counties of the Consortium – Cook, Itasca, Koochiching, and Lake. The survey focused on housing issues.

Links to the surveys were distributed to lists of the units of local government and agencies in the County and the Consortium, posted on the County's website, listed in news releases, and promoted at meetings attended by County staff members. The County also maintains contact with two Continuum of Care (CoC) groups in its region. The St. Louis County CoC and the Northeast Minnesota CoC coordinators were both contacted to further distribute the survey links to their provider agencies and contacts.

Copies of the survey questions and charts of their respective responses are included in the appendix to the plan.

NA-10 Housing Needs Assessment - 24 CFR 91.405, 24 CFR 91.205 (a,b,c)

Summary of Housing Needs

The housing needs and housing market analysis components which follow continue to support the programs prioritized by St. Louis County and the Consortium. Those programs include the following:

- Owner-occupied and rental housing rehabilitation
- Home ownership assistance
- Community Housing Development Organization (CHDO) development through rehabilitation and construction of owner-occupied and rental housing units

The 2010 Census data provides a baseline for discussion of the housing needs for St. Louis County and the Northeast Minnesota HOME Consortium. Additional information was received through the citizen participation process and Planning staff member association with regional housing and focus group meetings. The discussion will address housing needs related to the income levels of four categories of renter and owner households:

- Extremely low-income households (0-30% of median family income)
- Low-income households (31-50% of median family income)
- Moderate-income households (51-80% of median family income)
- Upper-income households (greater than 80% of median family income)

The predominance of home ownership (71%) versus rental (29%) in the County and Consortium remains a major factor in program and service delivery. For comparison, these percentages were 78% and 21% in 2015. This shows that the current housing stock has become less affordable for residents making renting their only option.

Extremely Low-Income Households

Renters

Approximately 31% of all renters are households that fall into the extremely low income category. This represents a 2% decrease when compared with the data from 2015. The extremely low income group also experiences a high percentage of housing problems (76.3%) and cost burden. Combining the > 30% and > 50% of income categories reveals 100% experience cost burden. This is because from 2000 to 2017, rent cost has gone up 13% and income has gone down by 4%. There is bigger cost burden, which has forced renters to move to less expensive rentals that typically have more problems.

Owners

Applying similar analysis to the ownership group reveals that only 7.4% of all owners fall into the extremely low income category. This rate is slightly higher from 2015 data. However, they experience a

similar percentages of housing problems (91.4%) and a higher combined cost burden rate of 100%. Housing values have increased by 44% from 2000 to 2017, which makes homes less affordable for lower income buyers. If they want to own a home, they need to find a lesser priced property, which most have problems that need to be fixed. Over the same period, income levels have increased less than 1%. This provides homeowners with less disposable income to address any problems with their home.

Demographics	Base Year: 2009	Most Recent Year: 2015	% Change
Population	0	187,794	
Households	0	81,356	
Median Income	\$0.00	\$0.00	

Table 5 - Housing Needs Assessment Demographics

Data Source: 2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)

Summary of Housing Needs (cont)

Low-Income Households

Renters

The low income category represents 21% of all renters. Their incidence of housing problems (53.4%) and combined cost burden rates (100%) as a group are less than the extremely low income group. This is up from 17.4% & 54.3% in 2015. Higher rents and lower income is the contributing factor to this increase.

Owners

While the percent of renters in this income category declined between extremely low income and low income, the percent of owners increased. The incidence of housing problems (99.9%) is higher for owners in this category and the combined cost burden ratio (61.9%) is lower. Both of these figures are higher than data from 2015. Higher home prices and almost no increase to income is the contributing factor to this increase.

General Comments

General Comments

Renters as a whole represent 21% of all households in the county and consortium. However, almost 73% of the renter households have an income less than 80% of the median. Of the 16,798 renter households in the county and Consortium, 12,640 may positively benefit from resources directed to rental-related programs that target income levels at 80% of median or less.

In contrast, home owners make up 79% of the region's households and 35.7% of the owner households have an income at 80% or less than the median. That percentage equates to 23,100 households that may benefit from ownership-related programs targeted by income.

Area of Minority Concentration

For the jurisdiction, an area of minority concentration is defined as any census tract within the jurisdiction that has a minority population percentage of 21.5% or greater. There are no such areas within the Consortium that are not on reservation lands of the Fond du Lac Band of Lake Superior Chippewa or the Bois Forte Band of Chippewa.

Area of Low-Income Concentration

Areas of low-income concentration are defined as those that qualify under the Qualified Census Tract (QCT) definition used with the Low-Income Housing Tax Credit Program. A QCT is any census tract in which at least 50% of the households have an income less than 60% of the Area Median Gross Income (AGMI) or where the poverty rate is at least 25%. There is one QCT (#130) within the city of Virginia in St. Louis County that meets the definition.

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	9,955	10,165	14,229	9,627	37,299
Small Family Households	2,688	2,005	4,307	3,481	18,838
Large Family Households	331	615	898	638	2,662
Household contains at least one person 62-74 years of age	1,845	2,621	3,786	3,017	9,377
Household contains at least one person age 75 or older	1,874	2,963	3,117	1,379	2,812
Households with one or more children 6 years old or younger	1,439	1,151	1,973	1,232	2,833

Table 6 - Total Households Table

Data Source: 2011-2015 CHAS

Housing Needs Summary Tables

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

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	276	103	54	92	525	235	156	146	96	633
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	98	20	49	8	175	8	16	55	18	97
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	69	67	52	24	212	26	66	225	91	408
Housing cost burden greater than 50% of income (and none of the above problems)	2,200	504	145	25	2,874	2,287	1,392	721	238	4,638
Housing cost burden greater than 30% of income (and none of the above problems)	1,425	1,271	889	165	3,750	1,184	1,770	2,359	1,142	6,455

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Zero/negative Income (and none of the above problems)	180	0	0	0	180	438	0	0	0	438

Table 7 – Housing Problems Table

Data 2011-2015 CHAS
Source:

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

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	2,635	688	293	149	3,765	2,486	1,565	1,094	423	5,568
Having none of four housing problems	2,591	2,927	3,118	1,745	10,381	1,902	5,126	9,879	7,382	24,289
Household has negative income, but none of the other housing problems	180	0	0	0	180	438	0	0	0	438

Table 8 – Housing Problems 2

Data 2011-2015 CHAS
Source:

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	1,360	535	385	2,280	1,026	920	1,159	3,105
Large Related	156	80	28	264	119	267	302	688
Elderly	821	739	375	1,935	1,628	1,607	1,213	4,448

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Other	1,638	546	281	2,465	1,155	797	863	2,815
Total need by income	3,975	1,900	1,069	6,944	3,928	3,591	3,537	11,056

Table 9 – Cost Burden > 30%

Data 2011-2015 CHAS
Source:

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	957	115	33	1,105	733	497	221	1,451
Large Related	117	0	0	117	107	111	34	252
Elderly	401	291	87	779	931	608	377	1,916
Other	1,000	143	20	1,163	816	375	194	1,385
Total need by income	2,475	549	140	3,164	2,587	1,591	826	5,004

Table 10 – Cost Burden > 50%

Data 2011-2015 CHAS
Source:

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	155	83	38	24	300	34	78	198	69	379
Multiple, unrelated family households	8	4	14	4	30	8	8	79	40	135
Other, non-family households	4	0	49	4	57	0	4	8	4	16
Total need by income	167	87	101	32	387	42	90	285	113	530

Table 11 – Crowding Information - 1/2

Data 2011-2015 CHAS
Source:

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	0	0	0	0	0	0	0	0

Table 12 – Crowding Information – 2/2

Data Source

Comments:

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

Estimates of the number of individuals are not available but the majority are males between the ages of 25 and 44.

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

Estimates of housing needs for these populations are not available. Advocates for Family Peace maintains several units for domestic abuse clients, but there are no other domestic abuse or sexual assault shelters in the County or Consortium outside Duluth. The Sexual Assault Program of Northern St. Louis County and the Advocates for Family Peace Program provide shelter when needed through safe houses with private individuals and motel rooms. Funding for the housing is also limited. Sexual Assault receives approximately \$1,500 annually for housing.

The housing problems for persons with disabilities are:

- Lack of available units - extremely limited choice
- Cost burden - exacerbated by limited disability income and high medical costs
- Quality of available units, living in the best of the worst - Client comment: How do I complain when there is nowhere else to go?

What are the most common housing problems?

Housing problems and cost burden is by far the most common housing problem for both renters and owners in the low- to moderate-income categories. Housing problem for homeowners (100%) is greater than for renters (57%) for low-to moderate income residents. Cost burden > 50% of income affects 44.8% of the renters and 48.6% of the owners in the extremely low-income category. For the > 30 cost burden level, these percentages change to 73.7% and 71.3% respectively, which is a big jump from 18% and 23% in 2015.

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

Partially answered in previous question. Small-related households that are renters are most affected at the > 30 and > 50% cost burden ranges and for the owners it's elderly households.

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

Individuals and families with children who are at risk of losing their housing is a focus for the County and Consortium. Many different factors are contributing to this issue, for example, fleeing domestic violence and/or sexual assault, landlord disputes, and loss of income. When individuals and families with children do become homeless and are re-housed, the CoC continues to work with them and find them alternatives. The CoC agencies and non-profits work very well together to help prevent homelessness and find alternative housing as much as possible, but the County and Consortium are experiencing a shortage of affordable units, especially for families.

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

The County and Consortium do not have a method for estimating the number of at-risk households.

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

The problem of cost burden for the extremely low-income and low-income categories creates an on-going risk of homelessness for these households.

Discussion

- Cost burden is the primary housing problem: combining its incidence in the 0-30% and 30-50% income ranges reveals approximately 100% of renter households experience cost burden
- Cost burden affects renters and owners almost equally (100%) at the 0-30% income range
- By household type, the small-related renters and the elderly owners are impacted most by cost burden
- The cost of rent and homes have increased significantly from 2000 to 2017 and wages have stayed flat for homeowners and decreased for renters.

NA-15 Disproportionately Greater Need: Housing Problems - 91.405, 91.205 (b)(2)

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

Introduction

The County and Consortium continue to experience limited racial and ethnic diversity. White households are the predominant racial category at 94.6% of all households followed by American Indian/Alaskan Native households at 2.9%. Housing problems do not appear to disproportionately affect any racial or ethnic group.

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	7,586	1,955	618
White	6,824	1,832	567
Black / African American	35	0	15
Asian	64	4	0
American Indian, Alaska Native	423	98	36
Pacific Islander	0	0	0
Hispanic	122	0	4

Table 13 - Disproportionally Greater Need 0 - 30% AMI

Data Source: 2011-2015 CHAS

*The four housing problems are:

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

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	5,212	5,146	0
White	4,927	4,866	0
Black / African American	29	0	0

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Asian	38	62	0
American Indian, Alaska Native	94	138	0
Pacific Islander	0	0	0
Hispanic	48	14	0

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Data Source: 2011-2015 CHAS

*The four housing problems are:

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

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	4,557	9,765	0
White	4,328	9,424	0
Black / African American	0	0	0
Asian	23	20	0
American Indian, Alaska Native	87	256	0
Pacific Islander	0	29	0
Hispanic	46	22	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Data Source: 2011-2015 CHAS

*The four housing problems are:

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

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,785	7,961	0

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
White	1,759	7,652	0
Black / African American	0	20	0
Asian	10	18	0
American Indian, Alaska Native	24	166	0
Pacific Islander	0	0	0
Hispanic	0	22	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Data Source: 2011-2015 CHAS

*The four housing problems are:

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

Discussion

The problems experienced by racial groups within each income category are reflective of the racial group as a whole. In other words, there is no disproportionately greater need experienced by any group.

NA-20 Disproportionately Greater Need: Severe Housing Problems - 91.405, 91.205 (b)(2)

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

Introduction

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	5,121	4,493	618
White	4,623	4,114	567
Black / African American	0	35	15
Asian	60	8	0
American Indian, Alaska Native	265	271	36
Pacific Islander	0	0	0
Hispanic	107	15	4

Table 17 – Severe Housing Problems 0 - 30% AMI

Data Source: 2011-2015 CHAS

*The four severe housing problems are:

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

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,253	8,053	0
White	2,135	7,618	0
Black / African American	4	25	0
Asian	19	81	0
American Indian, Alaska Native	38	188	0
Pacific Islander	0	0	0
Hispanic	4	58	0

Table 18 – Severe Housing Problems 30 - 50% AMI

Data Source: 2011-2015 CHAS

*The four severe housing problems are:

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

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,387	12,997	0
White	1,318	12,466	0
Black / African American	0	0	0
Asian	4	39	0
American Indian, Alaska Native	34	298	0
Pacific Islander	0	29	0
Hispanic	0	68	0

Table 19 – Severe Housing Problems 50 - 80% AMI

Data Source: 2011-2015 CHAS

*The four severe housing problems are:

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

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	572	9,127	0
White	564	8,819	0
Black / African American	0	20	0
Asian	0	28	0
American Indian, Alaska Native	8	178	0
Pacific Islander	0	0	0
Hispanic	0	22	0

Table 20 – Severe Housing Problems 80 - 100% AMI

Data Source: 2011-2015 CHAS

*The four severe housing problems are:

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

Discussion

Without greater regional racial and ethnic diversity, severe housing problems don't disproportionately affect any of the groups.

NA-25 Disproportionately Greater Need: Housing Cost Burdens - 91.405, 91.205 (b)(2)

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

Introduction

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	60,784	12,379	7,980	703
White	58,560	11,431	7,337	600
Black / African American	77	60	4	15
Asian	251	64	79	0
American Indian, Alaska Native	1,026	311	213	90
Pacific Islander	29	10	0	0
Hispanic	222	115	107	4

Table 21 – Greater Need: Housing Cost Burdens AMI

Data Source: 2011-2015 CHAS

Discussion

Disproportionate cost burden is not experienced by any racial or ethnic group.

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

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

No

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

Not applicable

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

NA-35 Public Housing - 91.405, 91.205 (b)

Introduction

The geographic boundaries of the County and Consortium incorporates 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 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 most recently focused on assisting the homeless through Continuum of Care priorities. The region's PHAs are a vital component of the homelessness housing response.

Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	10	1,111	796	9	785	0	0	0

Table 22 - Public Housing by Program Type

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

Data Source: PIC (PIH Information Center)

Characteristics of Residents

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher	
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program
# Homeless at admission	0	0	1	0	0	0	0	0
# of Elderly Program Participants (>62)	0	1	492	100	1	99	0	0
# of Disabled Families	0	7	259	370	2	366	0	0
# of Families requesting accessibility features	0	10	1,111	796	9	785	0	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 23 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

Program Type									
Race	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	10	1,069	732	9	721	0	0	0
Black/African American	0	0	13	14	0	14	0	0	0

Program Type									
Race	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Asian	0	0	2	5	0	5	0	0	0
American Indian/Alaska Native	0	0	24	44	0	44	0	0	0
Pacific Islander	0	0	3	1	0	1	0	0	0
Other	0	0	0	0	0	0	0	0	0
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 24 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

Program Type									
Ethnicity	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	8	2	0	2	0	0	0
Not Hispanic	0	10	1,103	794	9	783	0	0	0
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 25 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

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

The Section 504 needs assessment of accessibility found the public housing agencies to be currently meeting these needs of their residents to the best of their ability.

The housing problems for persons with disabilities are:

- Lack of available units - extremely limited choice
- Cost burden – exacerbated by limited disability income and high medical costs

What are the number and type of families on the waiting lists for public housing and section 8 tenant-based rental assistance? Based on the information above, and any other information available to the jurisdiction, what are the most immediate needs of residents of public housing and Housing Choice voucher holders?

Individual waiting lists were not reported by all the PHAs in the County and Consortium. From the reports received, the waiting lists range from 1 to 87 depending upon the type of units available from the PHA. Combined total waiting list for reporting PHAs is 418. Waiting lists for the elderly-only PHA units are lower than the waiting lists for the PHAs with general occupancy units. The PHAs have instituted process to review their waiting lists more quickly to limit numbers to those clients actually eligible for assistance.

The most immediate needs are:

- More affordable units – improved choice
- Improved quality of units
- Additional vouchers

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

The renting household population at large and the residents of public housing and clients desiring a housing voucher are similar. The prevalence of owner-occupied housing in the County and Consortium has resulted in most rental housing available being subsidized rental housing. The population at large and those clients eligible for the Housing Choice voucher program are competing for the same units.

Discussion

No further discussion.

NA-40 Homeless Needs Assessment - 91.405, 91.205 (c)

Introduction:

St. Louis County is made up of two entitlement communities, the City of Duluth and the remainder of St. Louis County outside Duluth. 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. Joint efforts between the City and County, along with homeless housing and service providers maintain and update the Plan to Prevent and End Homelessness in St. Louis County.

The goal of the Plan to End Homelessness and the Continuum of Care, through a countywide perspective and distribution of resources, is to help homeless individuals, families and youth to be rapidly re-housed in the most permanent housing possible, increase their housing stability and the housing security that goes along with stability, and to prevent new occurrences of homelessness. Supportive services provided for the homeless are designed to meet those needs with the understanding that homelessness is not caused merely by lack of shelter. Homelessness also involves underlying, unmet physical, economic and/or social needs.

City and County activities during 2019 focused on the HEARTH regulations and related activities to develop a coordinated homeless response system that incorporates new prevention, rapid re-housing and coordinated assessment activities outlined in the Emergency Solutions Grant regulations and the Continuum of Care regulations along with shelter, transitional housing, outreach, and supportive service activities. The Continuum of Care Advisory Committee is the governing and advisory group that oversees the activities of the homelessness plan and other homeless initiatives in Duluth and SLC, including the annual CoC funding competition, the Family Homeless Prevention and Assistance Program (FHPAP) state funding competition in SLC and the provides input to the Emergency Solutions Grant Program funding processes for both Duluth and SLC.

Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	258	371	0	0	0	0
Persons in Households with Only Children	44	144	0	0	0	0
Persons in Households with Only Adults	214	227	0	0	0	0
Chronically Homeless Individuals	71	32	0	0	0	0
Chronically Homeless Families	3	9	0	0	0	0
Veterans	0	0	0	0	0	0
Unaccompanied Child	0	0	0	0	0	0
Persons with HIV	0	0	0	0	0	0

Table 26 - Homeless Needs Assessment

Data Source Comments: The data includes all of St. Louis County and does not separate Duluth from the rest of the County.

Indicate if the homeless population is: Partially Rural Homeless

Rural Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	0	0	0	0	0	0
Persons in Households with Only Children	0	0	0	0	0	0
Persons in Households with Only Adults	0	0	0	0	0	0
Chronically Homeless Individuals	0	0	0	0	0	0
Chronically Homeless Families	0	0	0	0	0	0
Veterans	0	0	0	0	0	0
Unaccompanied Youth	0	0	0	0	0	0
Persons with HIV	0	0	0	0	0	0

Table 27 - Homeless Needs Assessment

Data Source Comments: The data includes all of St. Louis County and does not separate Duluth from the rest of the County.

For persons in rural areas who are homeless or at risk of homelessness, describe the nature and extent of unsheltered and sheltered homelessness with the jurisdiction:

No separate statistics are available for this population.

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

Data is unavailable for number of persons becoming and exiting homelessness each year and number of days that persons experience homelessness.

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
White	61	104
Black or African American	1	0
Asian	0	1
American Indian or Alaska Native	7	37
Pacific Islander	0	0
Ethnicity:	Sheltered:	Unsheltered (optional)
Hispanic	2	1
Not Hispanic	80	142

Data Source

Comments:

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

Data not available.

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

The White population makes up about 94% of the County and Consortium's population and accounts for 78% of the region's homeless population. American Indian or Alaska Native make up almost 21% of the homeless population but only 2.9% of the general population.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

According to the St. Louis County Point-in-Time (PiT), conducted on January 23, 2019, there were 519 homeless persons (341 households) in SLC, 183 unsheltered and 336 sheltered. A disproportionate number of those were American Indian/Alaska Native (21%). While SLC has reduced the number of chronically homeless persons in recent years, the PiT shows that there are still a high number of chronic singles households that were unsheltered or in shelters and a number of chronic families also in shelters.

Persons with serious mental illness, substance abuse, and victims of domestic violence are also disproportionately represented in the PiT.

Discussion:

No further discussion.

NA-45 Non-Homeless Special Needs Assessment - 91.405, 91.205 (b,d)

Introduction

Services for persons in the non-homeless special needs category are varied and reasonably available.

Describe the characteristics of special needs populations in your community:

Elderly

About 30% of all households were identified by the 2010 U.S. Census Demographic Profile as 65 years of age or older. The need for assistance with activities of simple daily living will increase as this group continues to age. The Consortium's population as a whole is getting older and has a greater need for housing with supportive services. According to the 2019-2022 MN Board of Aging, the year 2030 is when the baby boomer generation starts to turn 85. The need for supportive services will increase even more.

Persons with Developmental Disability

The Census data for the Consortium reports 16,236 persons age 65 and over with a mobility, self-care, sensory, or "go-outside-home" disability and 25,834 persons 21 to 64 years of age with these same limitations. This priority need will continue to be addressed over the next five years.

Persons with AIDS

Five people have been diagnosed with HIV/AIDS in the Consortium in 2018 (including the city of Duluth). Two-thirds of the people with AIDS are estimated to have incomes in the extremely-low income category.

Persons with Mental Illness

A community-based system that includes foster care, board and lodging, and supportive housing, based on individual needs, is scattered throughout the five counties and provides the primary housing for persons with mental illness. This system has integrated their clients more closely to residential neighborhoods through the use of single family residences.

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

Answered with previous question.

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

There were reported 5 cases of HIV/AIDS in all of St. Louis County during 2018 according to the Minnesota Department of Health HIV/AIDS Surveillance reports.

Discussion:

Projects designed to assist persons with non-homeless special needs are supported by St. Louis County and the Northeast Minnesota HOME Consortium through incorporation of special needs specific housing units or services to projects and programs designed to serve broader populations.

NA-50 Non-Housing Community Development Needs - 91.415, 91.215 (f)

Describe the jurisdiction's need for Public Facilities:

Respondents to the citizen participation process were asked to rank community facilities needs on a high, medium, low, or not-needed priority. The greatest needs identified are:

- Child care centers
- Creation of recreational trails (walking, biking, skiing, ATV)
- Shelters for abused or neglected children

How were these needs determined?

Community and citizen engagement through the citizen participation process previously outlined. The online survey results are included in the appendix.

Describe the jurisdiction's need for Public Improvements:

The greatest infrastructure need listed by respondents is technology connection (hi-speed internet and Wi-Fi). Following technology are streets, public transportation, sidewalks, storm water management, sewer, and water in respective priority.

How were these needs determined?

Community and citizen engagement through the citizen participation process previously outlined. The online survey results are included in the appendix.

Describe the jurisdiction's need for Public Services:

In relative priority order:

- Mental health services
- Child care services
- Youth services
- Senior services
- Job skills training and education

How were these needs determined?

Community and citizen engagement through the citizen participation process previously outlined. The online survey results are included in the appendix.

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

Discussion of the housing market conditions throughout St. Louis County and the Northeast Minnesota HOME Consortium is based on the data analysis and input from regional housing groups, service providers, local units of government, Continuums of Care, and citizens of the County and Consortium. Commissioners and housing advocates from each of the five counties in the Consortium also provided input included in the discussion. The citizen participation section of the Consolidated Plan lists additional informational meetings that provided input to this section.

Home Ownership

Home owners in our service area outnumber renters by almost four to one. This preference for owner-occupied housing coupled with a low market availability rate of approximately 2.0% creates an imbalance between supply and demand. At a market availability rate of less than 5%, housing choice in terms of location, price, style, and amenities is quite limited.

The continuing low market availability rate is in part attributable to the economic decline and population loss experienced between 1980 and 1990. During this period, many housing units were abandoned and demolished. Many of those units were the affordable units. Although we have experiencing improved economic conditions, the area has seen very limited development of new, low-cost units. Ongoing housing development has been targeted primarily to seasonal vacation properties and upscale single family housing.

Limited housing choice results in very little mobility or turnover in the housing market. Households are somewhat prohibited from upgrading their housing as their income and family conditions change. The effect on first time home buyers and lower income households is that low turnover reduces the “free up” of the affordable units which are attractive to them.

Economically speaking, limited choice or supply in comparison with ownership preference or demand may also indicate that housing prices are higher than they would be in a more balanced market. First time home buyers and lower income households are the hardest hit by this condition. This conclusion is supported by the cost burden percentages reflected for owners in the Housing Problems Table at an income level of less than 50% of the area median.

The low market availability rate is a substantial problem in and of itself. It is further complicated with a high percentage of the housing stock in substandard condition. Estimates based on the data indicate that 40-43% of the housing stock is between 50 and 70 years old and 25% of the housing stock is over 70 years old. With the average life span of a home estimated to be 40-50 years, a significant number of

units in our service area are in poor to fair condition at best. The Estimate of Substandard Units table that follows places as many as 64,176 owner occupied units in need of rehabilitation compared to 29,282 from 2015.

A majority of the affordable units are the older housing units. Therefore, not only do the supply and price of affordable units impact lower income households, these same units are more likely to be in substandard condition. The lower household income also prohibits homeowners from affording rehabilitation of their housing, resulting in further deterioration.

Introduction Continued

Renters

The Census data for rental units indicates a regional vacancy rate of 10.6% with varying rates for each county in the Consortium. The Census data is skewed by the number of year-round vacation rental properties in the region. These units are included in the “available for rent” numbers when they are neither affordable nor available to the vast majority of the regions residents.

Recent housing studies for Grand Rapids in Itasca County do not support the Census data. In this market, the study indicate rental vacancy rate is 1% or less. Census data for Grand Rapids shows rates of 2%. The 1% estimate is further supported by Housing Choice Voucher Program information indicating the difficulty clients have in finding a unit to rent. Even with reduced HCV Program budgets, there are unused vouchers.

The availability of quality/affordable rental units or even those that meet Housing Quality Standards further restricts the market for HCV clients.

Analysis indicates that 51.9% of all the renter households were at an income level of less than 50% of the area median. This factor influences the relatively low market rents for rental housing in our service area. The low rents limit landlords’ abilities to maintain or improve their rental units. Income levels coupled with low rents strongly suggest the potential for large numbers of substandard units in the region.

Estimates of the number of vacant or abandoned buildings is not collected or available for St. Louis County or the Consortium.

MA-10 Housing Market Analysis: Number of Housing Units - 91,410, 91.210(a)&(b)(2)

Introduction

The 2010 Census data indicates there are 81,044 occupied housing units in the County and Consortium compared to 77,944 listed in the previous Consolidated Plan. Renters occupy 16,798 units (21%) and owners occupy 64,246 units (79%). The vacancy rate for rental units ranges from 7.4% in Koochiching County to 17% in Lake County. Owner-occupied vacancy rates range from 1.9% in Koochiching County to 2.9% in Lake County.

The limited growth in housing units (3,100) given the population and geographic expanse of the County and Consortium is very minimal growth (4%) and reflective of the economic growth over the same period. Housing development activities in the next five years are anticipated to follow this trend.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	91,809	81%
1-unit, attached structure	1,499	1%
2-4 units	3,993	4%
5-19 units	3,154	3%
20 or more units	4,948	4%
Mobile Home, boat, RV, van, etc	7,520	7%
Total	112,923	100%

Table 28 – Residential Properties by Unit Number

Data Source: 2011-2015 ACS

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	274	0%	913	5%
1 bedroom	2,638	4%	5,355	31%
2 bedrooms	17,197	27%	6,306	37%
3 or more bedrooms	44,115	69%	4,799	28%
Total	64,224	100%	17,373	101%

Table 29 – Unit Size by Tenure

Data Source: 2011-2015 ACS

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

Renter households with an income less than 80% of the median occupy 12,640 (73.1%) of the occupied units. The PHAs in the County and Consortium provide a total of 1,169 units and 902 tenant-based vouchers indicating the remainder of the renters live in other subsidized or market rate units. A comprehensive list of the subsidized rental units in the County and Consortium is not available.

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

Information is not available about affordable housing units expected to be lost.

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

Market availability rates indicate there are needs for affordable rental and ownership housing throughout the County and Consortium. Housing choice in location, style, and amenity is very limited.

Describe the need for specific types of housing:

See discussion below

Discussion

The greatest need is provision of a variety of housing styles and prices in all communities. The County and Consortium are made up of 150 plus units of local government and unorganized areas cover 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. Comments received through the public participation process indicate that communities desire greater housing options for residents to keep them in the community and to attract new residents thereby creating greater housing stability and community sustainability. Vacation rentals is another area of concern. Properties are being bought up around the lakes for short term rentals. This limits the housing stock for people wanting to live in the area.

The reality is that it's not financially feasible for the private market to build new owned housing because its construction cost exceeds its market value. Nor is it financially feasible to build new rental housing. Resulting market values do not support required loan to value ratios and the market rents will also not support the debt. Even though housing values have increased over the years, wages have not gone up, which limits the affordable homes for lower income buyers.

MA-15 Housing Market Analysis: Cost of Housing - 91.410, 91.210(a)

Introduction

The cost for much of the owner-occupied housing in the region remains affordable to low- and moderate-income home buyers. The average purchase price for the Consortium's Home Ownership Assistance Program in 2019 was \$92,000. A 30-year mortgage at 4% will require a monthly principal and interest payment of approximately \$431. Including mortgage insurance, taxes, and insurance increase the payment to approximately \$675 per month.

Comparing owner-occupied housing cost to the 2019 HUD Fair Market rents for a 2-bedroom apartment (\$871) or 3-bedroom apartment (\$1121) has gone up tremendously since 2014 (\$692 for a 2-bedroom and \$902 for a 3-bedroom). This supports the prevalence for owner-occupied housing over rental housing in the region. However, the age of the region's housing stock leads to additional costs for utilities and maintenance that many home buyers don't fully factor into the analysis. With the increase in monthly rents and stagnant wages, it makes it extremely difficult for prospective home buyers to save money for a down payment.

Cost of Housing

	Base Year: 2009	Most Recent Year: 2015	% Change
Median Home Value	0	0	0%
Median Contract Rent	0	0	0%

Table 30 – Cost of Housing

Data Source: 2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	8,910	51.8%
\$500-999	7,291	42.4%
\$1,000-1,499	938	5.5%
\$1,500-1,999	207	1.2%
\$2,000 or more	189	1.1%
Total	17,535	101.9%

Table 31 - Rent Paid

Data Source: 2011-2015 ACS

Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	2,420	No Data

% Units affordable to Households earning	Renter	Owner
50% HAMFI	7,311	7,242
80% HAMFI	11,784	18,399
100% HAMFI	No Data	27,125
Total	21,515	52,766

Table 32 – Housing Affordability

Data Source: 2011-2015 CHAS

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	626	670	871	1,121	1,390
High HOME Rent	626	670	871	1,121	1,308
Low HOME Rent	626	670	815	941	1,050

Table 33 – Monthly Rent

Data Source: HUD FMR and HOME Rents

Is there sufficient housing for households at all income levels?

Owners: The low market availability rate of approximately 2.0% creates an imbalance between supply and demand. At a market availability rate of less than 5%, housing choice in terms of location, price, style, and amenities is quite limited.

Renters: Census estimates of a 9.2% rental vacancy rate are not supported by recent housing studies and program information from regional housing providers. The real vacancy rate is more accurately in the 2% range. Rental unit options are then severely limited in location, amenity, quality, and cost.

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

Owners: General housing prices are reasonable in most markets driven by their age and quality. New housing construction costs exceed their resulting market values limiting development to households that can invest the additional subsidy in their homes.

Renters: Even with several new rental projects in development, the shortage of affordable, quality units will continue and many lower-income households will continue to pay more than 30% of household income for rent.

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

The 2019 Fair Market Rent (FMR) for St. Louis County is calculated by HUD and adjusted by the number of bedrooms in a rental unit:

HUD uses 30% of income paid for rent as its presumed affordability level. In reality, paying 30% of household income for rent leaves little margin in the budget for low-income households.

The table below displays rent that is presumed affordable at different income levels. The true market rate that would be determined by the economics of supply and demand in our service area would be considerably lower than the FMR because the majority of the renter households are low and extremely low-income households. To afford the Fair Market Rent for a two-bedroom unit and pay no more than 30% of their income for rent, a household must earn at least \$16.75 per hour and work 40 hours per week.

- \$871.00 - Fair Market Rent - St. Louis County (HUD 6/28/2019)
- \$488.75 - The monthly rent an extremely low-income 3-person household paying 30% of adjusted mfi¹ can afford
- \$512.00 - The monthly rent a household earning minimum wage ² can afford
- \$360.00 - The monthly rent a 3-person household receiving TANF³ grant can afford

¹St. Louis County median family income (mfi) \$70,347 (HUD 6/28/2019)

²\$9.86/hour and \$20,509 annually

³\$1200/month (MN Dept. of Human Services)

Discussion

No further discussion.

MA-20 Housing Market Analysis: Condition of Housing - 91.410, 91.210(a)

Introduction

The age of the housing stock in the County and Consortium is some of the oldest in the state of Minnesota. The tables below indicate 13% of all units, owner and renter, were constructed since 2000. In numbers, that's 10,540 units out of 81,616 total units.

Many of the older homes are structurally sound but lack efficient, safe, and compliant systems of insulation, heating, electrical, plumbing, and exterior envelope (siding, windows, and doors). Deferred maintenance and functional obsolescence further adds to their condition.

Almost 70% of the region's units were built prior to 1978 indicating the presence of lead-based paint in these homes.

Describe the jurisdiction's definition for "substandard condition" and "substandard condition but suitable for rehabilitation":

Standard Condition Housing: Housing that in its initial construction and current condition meets requirements of the International Property Maintenance Code which describes basic structural conditions and living situations (e.g., height and allowable area, exits and emergency escapes, light, ventilation, sanitation, heating, room dimensions, smoke detectors and sprinkler systems, fire alarms, and the like) and are not concerned with cosmetic conditions of the dwelling.

Substandard Condition Housing: Housing which falls into one of two categories based upon assessment of whether or not it may be suitable for rehabilitation:

- Substandard Condition Housing not Suitable for Rehabilitation: defined as any housing that is damaged, dilapidated or deteriorated from any cause to the extent of more than 60% of the value of a similar new building.
- Substandard Condition Housing Suitable for Rehabilitation: defined as any housing not meeting the definition of standard housing nor meeting the definition of substandard housing not suitable for rehabilitation.

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	13,384	21%	7,093	41%
With two selected Conditions	517	1%	417	2%
With three selected Conditions	132	0%	49	0%
With four selected Conditions	8	0%	0	0%
No selected Conditions	50,135	78%	9,698	56%

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total	64,176	100%	17,257	99%

Table 34 - Condition of Units

Data Source: 2011-2015 ACS

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	8,232	13%	2,308	13%
1980-1999	12,512	20%	3,958	23%
1950-1979	27,586	43%	6,936	40%
Before 1950	15,839	25%	4,245	25%
Total	64,169	101%	17,447	101%

Table 35 – Year Unit Built

Data Source: 2011-2015 CHAS

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	43,425	68%	11,181	64%
Housing Units build before 1980 with children present	3,267	5%	2,305	13%

Table 36 – Risk of Lead-Based Paint

Data Source: 2011-2015 ACS (Total Units) 2011-2015 CHAS (Units with Children present)

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	0	0	0
Abandoned Vacant Units	0	0	0
REO Properties	0	0	0
Abandoned REO Properties	0	0	0

Table 37 - Vacant Units

Data Source: 2005-2009 CHAS

Vacant Units

Data is not available for suitability for rehabilitation regarding vacant housing. Historically vacant housing units are neglected and need some sort of rehabilitation as there isn't anyone at the properties daily to maintain the structure. Data collected from the U.S. Census Bureau 2010 Demographic Profile Data does provide vacancy data for the Consortium area. Across the five counties, the homeowner

vacancy rate is at 2%. Rental vacancies vary from 7.3% to 17% across the same area. Overall vacancy for all housing units (contains seasonal, recreational, or occasional use properties) vary from 17.7% to 57.3%.

Describe the need for owner and rental rehabilitation based on the condition of the jurisdiction's housing.

Owner: Expanding the conditions contained in the table above to include energy efficiency, and other major systems in need of rehabilitation, 79% of the owner-occupied units, 64,176 units, require improvement. Limiting the numbers to those units built prior to 1980 still involves 43,425 units (68%). Given these numbers, the need for owner-occupied rehabilitation is of high priority.

Renter: The numbers of units are fewer on the rental side, but the percentages similar. 99% of the units (17,257) are estimated to require some form of rehabilitation. 64% or 11,181 of the units were built before 1980 and are estimated to require more extensive rehabilitation.

Estimate the number of housing units within the jurisdiction that are occupied by low or moderate income families that contain lead-based paint hazards. 91.205(e), 91.405

Owner: Census data indicates 17% of the owner-occupied units have household incomes at 50% or less than median. Applying that percentage to the lead risk table above yields an estimate of 7,938 units.

Renter: Using the same data for renter-occupied units indicates 55.5% have a household income less than 50% of the median or 7,485 units.

Discussion

Owner-occupied and rental rehabilitation programs to assist the owners of these units remains a high priority within the County and Consortium.

MA-25 Public And Assisted Housing - 91.410, 91.210(b)

Introduction

The geographic boundaries of the County and Consortium incorporates 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 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 most recently focused on assisting the homeless through Continuum of Care priorities. The region's PHAs are a vital component of the homelessness housing response.

Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available	0	12	1,169	902	8	766	0	0	0
# of accessible units									
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 38 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

PHA	0/1-BR	2-BR	3-BR and Larger	Total Units
Itasca County	32	6	2	40
Koochiching County	0	0	0	0

Chisholm	65	20	24	109
Two Harbors	56	4	0	60
Ely	102	13	6	121
Hibbing	180	40	32	252
Gilbert	48	1	0	49
International Falls	78	2	0	80
Grand Rapids	92	0	0	92
Cook	47	9	4	60
Eveleth	6	16	12	34
Virginia	171	68	36	275
Totals	868	232	129	1227

Table 39 - Public Housing Inventory

Describe the supply of public housing developments:

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

The responses received from the PHAs in the County and Consortium listed rehabilitation and renovation of their units as a top priority. This does not mean the units are substandard or in poor condition. It reflects each HRA's desire to maintain quality units for their respective clients.

Federal budget cuts to PHA funding coupled with rising costs for rehabilitation have created increased deferred maintenance. The region's units are mostly older with some approaching 70 years old. These factors combine to require multi-year rehabilitation projects of smaller scale instead of broader-based improvements annually.

Public Housing Condition

Public Housing Development	Average Inspection Score
411 7th Street - Grand Rapids HRA	97
7th Ave & Park Terrace Apts - Hibbing HRA	n/a
Broadview Manor - Gilbert HRA	88
Calumet & Taconite Apts - Itasca HRA	94
Columbia Apts & Rouchleau Apts - Virginia HRA	75
First Ave Apts - Hibbing HRA	n/a
Haven Court - Hibbing HRA	79
Hilltop Homes - Eveleth HRA	91
Longyear Terrace - Chisholm HRA	82
Pine Mill Court & Scattered Site Duplexes - Virginia HRA	78
Pioneer Building & Scattered Site Duplexes - Cook HRA	97
Two Harbors HRA	97
Vermilion Homes & Zenith Apts - Ely HRA	98
Woodland Park - International Falls HRA	98

Table 40 - Public Housing Condition

Discussion Continued

The focus of Planning and Community Development through programs funded with CDBG, HOME, and ESG has been to serve public housing residents, as well as the broader L/MI clientele in the region. This focus is necessitated by the existence of twelve separate PHAs in the entitlement areas for which CDBG, ESG, and HOME funding are received and a commitment to strive for equitable service throughout the region.

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

Most of the PHAs in the County and Consortium have a limited number of units, 20-40 and these units are primarily targeted to seniors. Service programs for residents are found in the Hibbing and Virginia PHAs because of their larger number of concentrated units and their diversified resident base including singles, families with children, persons with disabilities, and seniors. For these PHAs, improving the living environment includes programs that provided greater resident security, crime reduction, and employment skills training.

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

Information submitted by PHAs identifies some of the resident programs/services currently provided and those to be expanded or developed in the next five years. PHAs are pro-active in the provision of services which enhance the quality of life for their residents. Because of the number and diversity of the PHAs in the Consortium some of the services may be provided at one location and in need of development at another.

Currently Provided

- Nutrition sites
- Scheduled bus transportation
- Resident Councils
- On-site maintenance staff
- Regularly scheduled activities
- Hearing aid service
- Diabetes/blood pressure testing
- Income tax preparation assistance
- Assisted living program
- On-site grocery store
- Community room/kitchen for group functions
- Family Investment Center
- Beauty shop
- Day care

To Be Developed or Expanded

- On-site assisted living availability
- Additional handicapped accessible units
- Job search/training
- After school child care
- Self-sufficiency development training
- Service networking-connection - others
- Family Investment Center services
- Transportation
- Community room

Discussion:

Local PHAs struggle with balancing the number of vouchers available and voucher dollar value. With HUD funding changes in 2004, PHAs stopped receiving fixed dollar amounts per voucher and were instead given a funding pool for vouchers. The pool provided latitude for PHAs to set voucher amounts relative to individual markets, but HUD cuts to the pool ultimately resulted in fewer vouchers available

for clients. PHAs employ the following measures to maintain balance with voucher numbers and voucher values:

- The PHAs initially reduced the number of vouchers issued through attrition. When a client relinquished or “turned over” a voucher, it was not reissued.
- Portability review. Previously, an assisted household could take its voucher from one PHA jurisdiction to another nationwide. The issuing jurisdiction was billed by the new jurisdiction for the voucher cost even if the rent was higher in the new jurisdiction. Under portability review, the issuing jurisdiction may deny portability if the rent in the new jurisdiction is higher than its limits or limit the portability amount to the issuing PHA’s rent limits.
- Staffing cuts or reduced hours of office operation. Administration of the Section 8 program is staff intensive. It requires inspection of units for compliance with Housing Quality Standards (HQS), and processing staff for the monthly landlord reimbursement. Cuts to staff in either area may jeopardize the quality of one of the nation’s foremost affordable housing programs.

The result of HUD changes and the PHA response measures has been growth in the PHA waiting lists for public housing units and Section 8 vouchers. To emphasize the concern, the area’s PHAs have experienced funding cuts to the Section 8 program in times of increased need.

MA-30 Homeless Facilities and Services - 91.410, 91.210(c)

Introduction

St. Louis County and the Northeast Minnesota HOME Consortium encompass two separate Continuum's of Care (CoCs) – the St. Louis County CoC and the Northeastern Minnesota CoC. The County CoC covers all of St. Louis County and includes Duluth which is also an entitlement community for the CDBG and ESG programs.

Facilities Targeted to Homeless Persons

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	11	0	86	209	0
Households with Only Adults	9	0	21	104	0
Chronically Homeless Households	0	0	0	51	0
Veterans	0	0	0	0	0
Unaccompanied Youth	0	0	0	16	0

Table 41 - Facilities Targeted to Homeless Persons

Data Source Comments:

Homeless Program and Services_1

AEOA Bill's House – Virginia	ES & TH	HH w/adults & w/children
AEOA Hibbing Scattered Sites	ES	HH w/adults & w/children
Range Transitional Housing	RA & S+C	HH w/adults & w/children

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Range Mental Health	S+C	HH w/adults
Range Mental Health – Perpich Apts	PSH	HH w/adults
AEOA Youth Foyer	PSH	HH w/youth, single parent’s w/children
Bois Forte – New Moon Project	ES, PSH, S+C	HH w/adults & w/children
Legal Aid	Legal Services	All HH

Homeless Program and Services_2

Salvation Army – Hibbing and Virginia	Meals Programs	All HH
SOAR Career Services	Employment Training	All HH
AEOA Employment and Training	Employment Training	All HH
Arrowhead Center	Chemical dependency	All HH
Grace House Shelter	ES	HH w/adults & w/children
Koochiching County Services	ES	HH w/children
Advocates for Family Peace	TH	HH w/children
AEOA	TH	HH w/children
AEOA – Life Program	TH	HH w/children
KOOTASCA Community Action	TH	HH w/adults & w/children

MN Assistance Council for Veterans TH HH w/Veterans

ES: emergency shelter

TH: transitional housing

PSH: permanent supportive housing

S+C: Shelter + Care Voucher Program

RA: rental assistance

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

The use of a coordinated assessment systems aids with determining client needs. These assessments allow proper linking of clients to mainstream programs and services that include those listed above. As stated earlier, the diversity and geographic expanse of the region necessitates collaboration between the homeless housing and service providers and the mainstream housing, service, mental health, physical health, and employment service providers. Many homelessness housing and service providers are also providers of mainstream services because of their expertise and capacity for delivery of the service.

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

There is not a veteran's specific program outside Duluth. Facilities that meet the needs of homeless persons, chronically homeless individuals and families, families with children, and veterans and their families, and unaccompanied youth are included in those served by the programs listed in the Homeless Programs list attached to this section.

MA-35 Special Needs Facilities and Services - 91.410, 91.210(d)

Introduction

The availability of services for persons with special needs will vary based upon their area of residence within the County and Consortium and their residence being rural or within a city. Services are more readily available in Grand Rapids, Hibbing, Virginia as centers of population than they are in outlying smaller communities and rural areas.

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

Elderly – Medium Priority

Elderly households make up 30% of all households in the County and Consortium. The need for assistance with activities of daily living increases as this group continues to age. The region's population as a whole is getting older and has a greater need for housing with supportive services such as meals programs, transportation, and personal care assistance.

Persons with Developmental Disability – Medium Priority

The Census data for the County and Consortium reports 20,891 persons age 65 and over with a mobility, self-care, sensory, or "go-outside-home" disability and 32,952 persons 16 to 64 years of age with these same limitations.

Persons with AIDS – Medium Priority

Approximately 196 people have been reported with HIV/AIDS in the Consortium (including the city of Duluth) in 2018. This is up from 85 in 2014. The Minnesota AIDS Project and the Minnesota Department of Health statistics show a concentration of cases in Duluth so the estimate for the Consortium region excluding Duluth is indeterminable. However, two-thirds of the people with AIDS are estimated to have incomes in the extremely-low income category.

Persons with Mental Illness – Medium Priority

A community-based system that includes foster care, board and lodging, and supportive housing, based on individual needs, is scattered throughout the five counties and provides the primary housing for persons with mental illness. This system has integrated their clients more closely to residential neighborhoods through the use of single family style residences that have replaced larger "boarding homes".

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

The Continuums of Care (CoCs) and State of MN adhere to HUD policy prohibiting discharge from health care facilities into McKinney-Vento funded beds. Medical needs at discharge are identified and interdisciplinary teams, including RHs and Social Workers, coordinate discharge plans to assure that patients are discharged to the most appropriate level of care. Based on identified needs, patients are discharged to acute rehab, sub-acute rehab, or home. Local shelter staffs have well established relationships with hospital emergency room, general, and mental health discharge planners to assure discharge to housing first. The SLC CoC has determined that a very low percent of persons are discharged from hospitals to homelessness in our region. Persons without housing routinely go to scattered site market rate apartments, state or locally funded housing, group homes, adult foster care, shared living arrangements, and state rental subsidies.

Protocol is also in place to prevent discharging people to a shelter or streets from a state regional mental health facility. Per state mandate all persons committed to any treatment facility are assigned a mental health case manager through the home county of the person discharged. Discharge planning begins during the commitment process & continues through discharge. The case manager assists in locating appropriate housing. St. Louis County's Adult Discharge Policy works with local mental health agencies to implement appropriate protocols for homeless patients discharged from behavioral health facilities in St Louis County. Persons without housing routinely go to scattered site market rate apartments, state or locally funded housing, group homes, adult foster care, shared living arrangements, and state rental subsidies.

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

Proposed activities in the 2020 Action Plan are not solely targeted to persons with special needs but include them in the broader client eligibility.

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

Proposed activities in the 2020 Action Plan are not solely targeted to persons with special needs but include them in the broader client eligibility.

MA-40 Barriers to Affordable Housing - 91.410, 91.210(e)

Describe any negative effects of public policies on affordable housing and residential investment

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 versus 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
- Limited involvement of developers and the local financial community in regional development

MA-45 Non-Housing Community Development Assets - 91.410, 91.210(f)

Introduction

<div class="Section1"></div>

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	4,001	4,261	10	13	3
Arts, Entertainment, Accommodations	4,885	4,257	12	13	1
Construction	2,643	2,213	6	7	1
Education and Health Care Services	11,432	7,547	28	23	-5
Finance, Insurance, and Real Estate	2,336	1,414	6	4	-2
Information	439	189	1	1	0
Manufacturing	3,220	2,164	8	7	-1
Other Services	1,783	1,465	4	5	1
Professional, Scientific, Management Services	2,117	1,241	5	4	-1
Public Administration	0	0	0	0	0
Retail Trade	5,613	5,522	14	17	3
Transportation and Warehousing	1,328	755	3	2	-1
Wholesale Trade	1,595	1,138	4	4	0
Total	41,392	32,166	--	--	--

Table 42 - Business Activity

Data Source: 2011-2015 ACS (Workers), 2015 Longitudinal Employer-Household Dynamics (Jobs)

Labor Force

Total Population in the Civilian Labor Force	56,901
Civilian Employed Population 16 years and over	52,589
Unemployment Rate	7.36
Unemployment Rate for Ages 16-24	21.72
Unemployment Rate for Ages 25-65	4.81

Table 43 - Labor Force

Data Source: 2011-2015 ACS

Occupations by Sector	Number of People
Management, business and financial	10,249
Farming, fisheries and forestry occupations	2,079
Service	6,034
Sales and office	12,211
Construction, extraction, maintenance and repair	7,264
Production, transportation and material moving	4,041

Table 44 – Occupations by Sector

Data Source: 2011-2015 ACS

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	36,451	73%
30-59 Minutes	10,726	22%
60 or More Minutes	2,598	5%
Total	49,775	100%

Table 45 - Travel Time

Data Source: 2011-2015 ACS

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	1,221	156	1,400
High school graduate (includes equivalency)	11,340	1,099	5,581
Some college or Associate's degree	19,649	1,265	5,795
Bachelor's degree or higher	11,671	253	2,441

Table 46 - Educational Attainment by Employment Status

Data Source: 2011-2015 ACS

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	46	134	72	421	923
9th to 12th grade, no diploma	1,280	464	472	1,345	2,122
High school graduate, GED, or alternative	2,894	3,003	3,107	11,979	8,742
Some college, no degree	2,845	3,457	3,330	9,941	4,261
Associate's degree	859	2,630	2,424	5,133	1,205
Bachelor's degree	682	2,275	2,269	5,881	2,846
Graduate or professional degree	31	706	1,052	2,490	1,482

Table 47 - Educational Attainment by Age

Data Source: 2011-2015 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	1,393,030
High school graduate (includes equivalency)	3,259,517
Some college or Associate's degree	3,686,356
Bachelor's degree	3,987,960
Graduate or professional degree	4,011,215

Table 48 – Median Earnings in the Past 12 Months

Data Source: 2011-2015 ACS

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

The education and health care industries followed by retail trade, accommodations, and mining and mining-related service industries.

Describe the workforce and infrastructure needs of the business community:

The workforce is well educated and predominately between 35 and 65 years old. With the recent need for trade jobs, these numbers will see a slight shift over the next few years.

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

Over the last 20 years, the region's youth moved from trade-related education to greater post-secondary education due to limited job availability. Recent mining industry retirement has created increased but limited demand for skilled trades' workers and growth in precious minerals mining would also increase demand for workers. The educational systems in the County and Consortium are revisiting vocational program development at the high school level and creating high school connections to college level programs. One of these initiatives is the Applied Learning Institute (www.alimn.org/) a partnership between the region's school districts and technical colleges to provide students hands-on training for jobs at the high school level. This success of the Applied Learning Institute has fostered the "Education Innovation Partners" initiative by the Northeast Higher Education District (www.nhed.edu/) to further expand the system.

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

See above comments

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

See comments above

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

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

Not applicable

Discussion

No further discussion.

MA-50 Needs and Market Analysis Discussion

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

Not applicable to the County or Consortium.

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

The American Indian population in the County and Consortium is concentrated on the Fond du Lac Band of Lake Superior Chippewa and Bois Forte Band of Chippewa reservations.

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

The County and Consortium program exclude reservation areas because of their separate receipt of similar program funding as Native American entitlement entities.

Are there any community assets in these areas/neighborhoods?

The tribal governments on the reservations have been expanding and developing community resources to better serve their populations. These resources include economic development strategies to create jobs and new rental and ownership housing development to improve housing stability. The Fond du Lac Band and Bois Forte Band have also developed homelessness housing and services on their reservations.

Are there other strategic opportunities in any of these areas?

Representatives of the tribal communities are connected to the St. Louis County and Northeast Minnesota Continuum of Care groups enabling shared development of on and off reservation housing and services.

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

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

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 of having a good connection will continue increase. One of the area's leading proponent 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 over 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.

Most low-to-moderate income households live in urban areas due to cost of rural homes, concentration of rental units, subsidized housing, and location of service agencies. According to the Blandin Coverage Maps, urban areas have good-to-adequate broadband coverage. The area of need for broadband expansion is rural households, which typically are of higher income.

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

Having more service providers gives customers a choice in who they want go through, helps keep prices competitive, better service, different package options, and competitive internet speeds. The five county area has on average 9 service providers. Some have 2 and some have 19. Not all providers cover all areas, but as broadband expands throughout the rural areas, more providers will come. Competition is a necessity when it comes to broadband internet.

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

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

Climate change has become a very political issue on both sides of the aisle. St. Louis County does not take a stance on this issue. According to our research, however, there appears to be no glaring visible changes associated to climate change. Reviewing climate trends from the Minnesota DNR website does indicate that the average temperature, maximum temperature, and minimum temperature have increased over the last 70 years. The average precipitation seems to be holding steady.

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

At this time, there appears to be no effect on low-to-moderate income households.

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The area served under the St. Louis County CDBG and ESG program is all of St. Louis County excluding the city of Duluth. 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 the city of Duluth). The city of Duluth receives a separate entitlement allocation from HUD.

SP-10 Geographic Priorities - 91.415, 91.215(a)(1)

Geographic Area

Table 49 - Geographic Priority Areas

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

General Allocation Priorities

Describe the basis for allocating investments geographically within the state

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, community facilities and public infrastructure, and public services. Eligible applicants are cities, townships, and nonprofit agencies 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 Northeast Minnesota HOME Consortium made up of the counties of Cook, Itasca, Koochiching, Lake and St. Louis (excluding the city of Duluth). Similar to CDBG, there is an annual competitive allocation process. A HOME Consortium advisory committee reviews applications and makes funding recommendations to the St. Louis County Board. The advisory

committee is made up of two representatives from each county appointed by their respective county boards.

ESG funding is also allocated annually based on a review process connected to the St. Louis County.

Continuum of Care (CoC). The process includes several layers of community and agency group review prior to recommendation by the CoC Leadership Council to the St. Louis County Board.

SP-25 Priority Needs - 91.415, 91.215(a)(2)

Priority Needs

Table 50 – Priority Needs Summary

1	Priority Need Name	Affordable Housing
	Priority Level	High
	Population	Low Moderate Large Families Families with Children
	Geographic Areas Affected	Geographic
	Associated Goals	Housing: Home Ownership Assistance Program Housing: Home Ownership Education Housing: Owner and Renter Housing Development Housing: Owner-Occupied and Rental Rehabilitation
	Description	Affordable housing priorities include owner-occupied and rental unit rehabilitation, new affordable ownership and rental development, and acquisition, rehabilitation, and resale of owner-occupied property.
	Basis for Relative Priority	Community, agency, and resident responses to the citizen participation process.
2	Priority Need Name	Economic Development
	Priority Level	Low
	Population	Low Moderate Non-housing Community Development
	Geographic Areas Affected	Geographic
	Associated Goals	Economic Development: Career Development Economic Development: Microenterprise Assistance
	Description	Provision of microenterprise technical assistance to individuals desiring to start or expand self-employment opportunities.
	Basis for Relative Priority	Community, agency, and resident responses to the citizen participation process.

3	Priority Need Name	Community Facilities and Public Infrastructure
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Non-housing Community Development
	Geographic Areas Affected	Geographic
	Associated Goals	Community Facilities: Accessibility Community Facilities: Demolition/Clearance Community Facilities: Improvements Public Infrastructure: Improvements Community Facilities: Commercial Rehabilitation
	Description	<ul style="list-style-type: none"> • Rehabilitation of community facilities including accessibility modifications • Demolition of facilities • Rehabilitation of water/sewer/storm sewer utilities
	Basis for Relative Priority	Community, agency, and resident responses to the citizen participation process.
4	Priority Need Name	Public Services
	Priority Level	High

	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Victims of Domestic Violence Non-housing Community Development
	Geographic Areas Affected	Geographic
	Associated Goals	Public Services
	Description	<ul style="list-style-type: none"> • Homelessness housing and services – Continuum of Care connected • Health and safety programs for children • Employment training
	Basis for Relative Priority	Community, agency, and resident responses to the citizen participation process.

Narrative (Optional)

The CDBG eligible area includes 97 units of general local government creating vast diversity in individual community priorities. However, there are a number of general priorities that cover the CDBG jurisdiction. These are listed below based upon four application focus areas for County's CDBG program:

- Housing: Owner-occupied housing rehabilitation, development of new owner-occupied housing, and rental rehabilitation
- Economic development: Microenterprise business development assistance
- Community Facilities and Public Infrastructure: Rehabilitation of community facilities including accessibility modifications, demolition of facilities, and rehabilitation of water/sewer/storm sewer utilities
- Public Services: Homelessness housing and services – Continuum of Care connected, health and safety programs for children, and employment training

SP-30 Influence of Market Conditions - 91.415, 91.215(b)

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	n/a
TBRA for Non-Homeless Special Needs	n/a
New Unit Production	Low vacancy rates for both owner and rental housing
Rehabilitation	Age and condition of large % of units - both owner and rental
Acquisition, including preservation	Acquisition/rehab/resale of owner-occupied units due to age and condition

Table 51 – Influence of Market Conditions

Summary of Housing Needs (cont)

Low-Income Households

Renters

The low income category represents 21% of all renters. Their incidence of housing problems (53.4%) and combined cost burden rates (100%) as a group are less than the extremely low income group. This is up from 17.4% & 54.3% in 2015. Higher rents and lower income is the contributing factor to this increase.

Owners

While the percent of renters in this income category declined between extremely low income and low income, the percent of owners increased. The incidence of housing problems (99.9%) is higher for owners in this category and the combined cost burden ratio (61.9%) is lower. Both of these figures are higher than data from 2015. Higher home prices and almost no increase to income is the contributing factor to this increase.

General Comments

General Comments

Renters as a whole represent 21% of all households in the county and consortium. However, almost 73% of the renter households have an income less than 80% of the median. Of the 16,798 renter households in the county and Consortium, 12,640 may positively benefit from resources directed to rental-related programs that target income levels at 80% of median or less.

In contrast, home owners make up 79% of the region's households and 35.7% of the owner households have an income at 80% or less than the median. That percentage equates to 23,100 households that may benefit from ownership-related programs targeted by income.

Area of Minority Concentration

For the jurisdiction, an area of minority concentration is defined as any census tract within the jurisdiction that has a minority population percentage of 21.5% or greater. There are no such areas within the Consortium that are not on reservation lands of the Fond du Lac Band of Lake Superior Chippewa or the Bois Forte Band of Chippewa.

Area of Low-Income Concentration

Areas of low-income concentration are defined as those that qualify under the Qualified Census Tract (QCT) definition used with the Low-Income Housing Tax Credit Program. A QCT is any census tract in which at least 50% of the households have an income less than 60% of the Area Median Gross Income (AGMI) or where the poverty rate is at least 25%. There is one QCT (#130) within the city of Virginia in St. Louis County that meets the definition.

SP-35 Anticipated Resources - 91.420(b), 91.215(a)(4), 91.220(c)(1,2)

Introduction

The year 1 expected amounts are based upon notification of actual HUD-CPD awards. The expected amounts for the remainder of the Consolidated Plan are forecasted from the 2020 awards.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,979,736	90,000	230,000	2,299,736	8,000,000	
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	548,584	55,000	0	603,584	2,000,000	

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	167,851	0	0	167,851	640,000	

Table 52 - Anticipated Resources

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

CDBG, HOME, and ESG funding leverages in excess of \$4 for every entitlement dollar meaning an annual estimate of \$9.5-10 million and approximately \$50 million over the five-year plan. 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

n/a

Discussion

No further discussion.

SP-40 Institutional Delivery Structure - 91.415, 91.215(k)

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

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
ST. LOUIS COUNTY	Government	Planning	Jurisdiction
St. Louis County Continuum of Care	Continuum of care	Homelessness	Jurisdiction
Northeast Continuum of Care	Continuum of care	Homelessness	Jurisdiction
ARROWHEAD ECONOMIC OPPORTUNITY	Non-profit organizations	Homelessness Ownership Rental public services	Jurisdiction
KOOTASCA COMMUNITY ACTION, INC.	Non-profit organizations	Homelessness Ownership Rental public services	Jurisdiction
Advocates for Family Peace	Non-profit organizations	public services	Jurisdiction
LEGAL AID SERVICE OF NORTHEASTERN MINNESOTA	Non-profit organizations	Homelessness public services	Jurisdiction
RANGE TRANSITIONAL HOUSING, INC	Non-profit organizations	Homelessness Rental public services	Jurisdiction
SALVATION ARMY HIBBING	Community/Faith- based organization	Homelessness public services	Jurisdiction
SALVATION ARMY OF VIRGINIA	Community/Faith- based organization	Homelessness public services	
SEXUAL ASSAULT PROGRAM OF NORTHERN ST LOUIS COUNTY	Non-profit organizations	Homelessness public services	Jurisdiction
SOAR CAREER SOLUTIONS	Non-profit organizations	Economic Development Homelessness public services	Jurisdiction

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Local units of govt in SLC & Consortium	Government	Economic Development Homelessness Non-homeless special needs Ownership Public Housing Rental public facilities	Jurisdiction

Table 53 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

St. Louis County and the Consortium have a partnership with the units of local government in the region and the local network of for profit and nonprofit housing and public service providers. This network provides strong service delivery in the most populated areas but varying degrees of coverage in the outlying rural areas.

The Consortium has three eligible CHDOs that each have credible capacity in both rental and home ownership housing development to complement their respective supportive service delivery capacity. The approved CHDOs for the Northeast Minnesota HOME Consortium are:

- The Arrowhead Economic Opportunity Agency serving Cook, Lake, and St. Louis County
- KOOTASCA Community Action, Inc. serving Itasca and Koochiching County
- One Roof Community Housing serving southern St. Louis County

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

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	
Legal Assistance	X	X	
Mortgage Assistance	X	X	
Rental Assistance	X	X	
Utilities Assistance	X	X	
Street Outreach Services			
Law Enforcement	X	X	
Mobile Clinics			
Other Street Outreach Services	X	X	

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

Table 54 - Homeless Prevention Services Summary

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

Supportive services are generally available for all persons with specific supportive services targeted to the groups listed above to assist their movement along the homelessness continuum.

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

The strength of the delivery system within St. Louis County and the Consortium is the cooperation among agencies. Little overlap of service delivery exists creating interagency collaboration and client referral. Federal, state, and local cuts to agency funding have created further reliance on this dependent network.

Gaps in the service delivery system are dealt with through shared response between agencies as possible. Rural areas are most affected by gaps in service delivery.

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

SP-45 Goals - 91.415, 91.215(a)(4)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Housing: Home Ownership Education	2020	2024	Affordable Housing	St. Louis County and the NE Minnesota HOME Consortium	Affordable Housing	CDBG: \$0 HOME: \$0 ESG: \$0	Public service activities other than Low/Moderate Income Housing Benefit: 750 Persons Assisted
2	Housing: Owner and Renter Housing Development	2020	2024	Affordable Housing	St. Louis County and the NE Minnesota HOME Consortium	Affordable Housing	CDBG: \$275,000 HOME: \$350,000 ESG: \$0	Homeowner Housing Added: 5 Household Housing Unit
3	Housing: Home Ownership Assistance Program	2020	2024	Affordable Housing	St. Louis County and the NE Minnesota HOME Consortium	Affordable Housing	CDBG: \$0 HOME: \$1,700,000 ESG: \$0	Direct Financial Assistance to Homebuyers: 250 Households Assisted
4	Housing: Owner-Occupied and Rental Rehabilitation	2020	2024	Affordable Housing	St. Louis County and the NE Minnesota HOME Consortium	Affordable Housing	CDBG: \$1,625,000 HOME: \$0 ESG: \$0	Rental units rehabilitated: 160 Household Housing Unit Homeowner Housing Rehabilitated: 70 Household Housing Unit

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 and the NE Minnesota HOME Consortium	Public Services	CDBG: \$1,225,000 HOME: \$0 ESG: \$800,000	Public service activities other than Low/Moderate Income Housing Benefit: 36250 Persons Assisted Tenant-based rental assistance / Rapid Rehousing: 2500 Households Assisted Homeless Person Overnight Shelter: 2380 Persons Assisted Homelessness Prevention: 1250 Persons Assisted
6	Community Facilities: Accessibility	2020	2024	Non-Housing Community Development	St. Louis County and the NE Minnesota HOME Consortium	Community Facilities and Public Infrastructure	CDBG: \$100,000 HOME: \$0 ESG: \$0	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 10 Persons Assisted
7	Community Facilities: Improvements	2020	2024	Non-Housing Community Development	St. Louis County and the NE Minnesota HOME Consortium	Community Facilities and Public Infrastructure	CDBG: \$250,000 HOME: \$0 ESG: \$0	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 2500 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
8	Public Infrastructure: Improvements	2020	2024	Non-Housing Community Development	St. Louis County and the NE Minnesota HOME Consortium	Community Facilities and Public Infrastructure	CDBG: \$5,000,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 40000 Persons Assisted
9	Community Facilities: Demolition/Clearance	2020	2024	Non-Housing Community Development	St. Louis County and the NE Minnesota HOME Consortium	Community Facilities and Public Infrastructure	CDBG: \$250,000 HOME: \$0 ESG: \$0	Buildings Demolished: 15 Buildings
11	Economic Development: Microenterprise Assistance	2020	2024	Non-Housing Community Development	St. Louis County and the NE Minnesota HOME Consortium	Economic Development	CDBG: \$50,000 HOME: \$0 ESG: \$0	Businesses assisted: 50 Businesses Assisted
12	Economic Development: Career Development	2020	2024	Non-Housing Community Development	St. Louis County and the NE Minnesota HOME Consortium	Economic Development	CDBG: \$100,000 HOME: \$0 ESG: \$0	Public service activities other than Low/Moderate Income Housing Benefit: 50 Persons Assisted
13	Community Facilities: Commercial Rehabilitation	2020	2024	Non-Housing Community Development	St. Louis County and the NE Minnesota HOME Consortium	Community Facilities and Public Infrastructure	CDBG: \$125,000	Facade treatment/business building rehabilitation: 10 Business

Table 55 – Goals Summary

Goal Descriptions

1	Goal Name	Housing: Home Ownership Education
	Goal Description	Support and maintain access to affordable housing by providing education and counseling to first-time home buyers. This activity does not receive HUD entitlement funding but is a required component of the HOME-funded Home Ownership Assistance Program.
2	Goal Name	Housing: Owner and Renter Housing Development
	Goal Description	Improve access to affordable housing through development of owner-occupied and rental housing.
3	Goal Name	Housing: Home Ownership Assistance Program
	Goal Description	Create greater affordability of decent housing by providing financial assistance to first-time home buyers.
4	Goal Name	Housing: Owner-Occupied and Rental Rehabilitation
	Goal Description	Preserve and maintain affordable housing through rehabilitation of owner-occupied and rental housing.
5	Goal Name	Public Services
	Goal Description	Contribute to a more suitable living environment for low- and moderate-income persons through delivery of public services that support core County functions. Priority is placed on those services connected to the Continuum of Care for the homeless.
6	Goal Name	Community Facilities: Accessibility
	Goal Description	Improve public access to community facilities for persons with disabilities through ADA-like physical improvements to eligible structures.
7	Goal Name	Community Facilities: Improvements
	Goal Description	Create a more suitable living environment through increased availability of community facilities including community buildings, playgrounds, parks, recreation areas, and trails.

8	Goal Name	Public Infrastructure: Improvements
	Goal Description	Preserve and maintain a more suitable living environment through improvement of public infrastructure.
9	Goal Name	Community Facilities: Demolition/Clearance
	Goal Description	Create a more sustainable living environment through clearance and demolition of slum and blighted property, and through improvement of community facilities.
11	Goal Name	Economic Development: Microenterprise Assistance
	Goal Description	Create greater availability and accessibility to economic opportunity through micro-enterprise education and technical assistance training.
12	Goal Name	Economic Development: Career Development
	Goal Description	Create greater availability and accessibility to economic opportunity through career training for low- and moderate-income persons.
13	Goal Name	Community Facilities: Commercial Rehabilitation
	Goal Description	Facade treatment/business building rehabilitation

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

During the term of the 2020-2024 Consolidated Plan, St. Louis County and the Northeast Minnesota HOME Consortium propose to assist 505 households.

SP-50 Public Housing Accessibility and Involvement - 91.415, 91.215(c)

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

n/a

Activities to Increase Resident Involvements

Active engagement and discussion between the PHAs and their respective tenants.

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

No

Plan to remove the 'troubled' designation

Not applicable

SP-55 Strategic Plan Barriers to Affordable Housing - 91.415, 91.215(h)

Barriers to Affordable Housing

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

- Lack of capacity to develop housing by nonprofit organizations
- High cost of new housing construction versus expected return on investment
- Enormity of the need for rehabilitation and the tendency to focus on a 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
- Limited involvement of developers and the local financial community in regional development

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

- Continue the use of HOME funding to assist with CHDO capacity and CHDO development training and projects
- Explore industry practices to reduce construction costs
- Maintain funding to owner-occupied rehabilitation programs and seek to leverage existing sources
- Expand rental rehabilitation programs
- Encourage nonprofit and private partner housing development

SP-60 Homelessness Strategy - 91.415, 91.215(d)

Describe how the jurisdiction's strategic plan goals contribute to:

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

Addressed below

Addressing the emergency and transitional housing needs of homeless persons

Addressed below

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.

Addressed below

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

St. Louis County's goal continues to be preventing homelessness from occurring whenever possible as it is disruptive to families and children to move to a new residence and is cost effective for families to remain in their residence. The St. Louis County CDBG citizen advisory committee has always given high priority to preventing and ending homelessness and the presumed benefit activities. Presumed benefit activity serves a specific clientele, rather than providing service to all the persons in a geographic area. Examples would be abused women, persons with mental illness or persons who are homeless. Historically, over 60% of CDBG public service funds are expended on projects that address homeless issues, transitional housing and shelter operations, and support services.

CDBG funding will be allocated to support transitional housing case management and legal assistance to individuals and families who are homeless or at-risk of becoming homeless. CDBG funding will also support services which increase independent living skills, education, employment and access to programs and resources for at-risk youth and young adults. CDBG funding assists two community soup kitchens provide for the nutritional needs as well as social needs of homeless persons and those at –risk

of becoming homeless. CDBG funds will continue to augment services offered at an emergency shelter to serve homeless persons, and a money management program will offer education, counseling, and skill building to deal with budgeting and financial problems.

Homeless Strategy continued

ESG program allocations support a collaborative effort of the Rural Housing Coalition in addressing the needs of homeless persons through provision of essential services, homeless prevention, operation of shelters and transitional housing. Historically, over 95% of ESG funds support these activities.

Program implementation will include more effective use of CDBG and ESG funds to serve homeless people and to use the state's Family Homeless Prevention and Assistance Program (FHPAP) funds to prevent homelessness. The combination of housing and support services has proven to be both successful and cost effective under FHPAP. Direct assistance service is used to pay rent, deposit, transportation and utility bills. St. Louis County has been awarded FHPAP funds since 1995 and has received over \$2.2 million for use in homeless prevention and assistance since then.

St. Louis County service providers have identified a number of successful strategies to maintain people in housing and to access new housing. One of the most effective strategies is to build strong working relationships with landlords, housing authorities, and property management groups. Landlords would be very receptive to case managers who make home visits with tenants and to having a contact person in the event they have concerns or problems. Private landlords and management companies have been cooperative in developing rental agreements that allow previously rejected housing applicants the means to gain admission to housing. Some landlords have been responsive in maintaining affordable housing stock.

Homeless Strategy continued (1)

An additional strategy is to coordinate public and private resources to fill the service gaps and avoid duplication of services in order to make the system user-friendly to homeless people. A review of CDBG and ESG funds occurs each year to analyze the success in meeting this strategy.

The St. Louis County Public Health and Human Services Department (PHHS) facilitates the continuum of care planning process which encompasses all of St. Louis County. PHHS works with the City of Duluth Housing and Community Development and with private nonprofit organizations to prioritize housing needs, provide services, and maximize the use of federal, state, and local funds for homeless individuals and families. CDBG and ESG program funds are coordinated to support the goals of St. Louis County's *Continuum of Care Plan*.

In 1996, St. Louis County was first awarded HUD Homeless Assistance Program funding to address homelessness and since then has received over \$14.6 million. Continuum planning groups are now required by HUD to adopt a vision and develop strategies for ending chronic homelessness, including an

institutional discharge policy. Federal legislation now stipulates a focus on permanent housing with support services rather than supportive services only. This forces a systemic shift locally in how continuum of care services are both provided and funded.

This shifted the focus of activities and associated funding on the local level and in 2004 St. Louis County and the City of Duluth restructured the homeless continuum of care process to focus on ending homelessness and chronic homelessness. The new *Committee to End Homelessness* is responsible for the development of a broad strategic and funding plan to end homelessness by 2012. St. Louis County's CDBG and ESG funding will be used to strategically support essential homeless prevention, housing operations and support services as part of the homeless strategy.

The County will address the need for emergency and transitional housing as a high priority for individuals and families and other homeless subpopulations with special needs, such as HIV/AIDS, disabled, and substance abuse and mental health problems, as the County continues to work to end chronic homelessness.

Homeless Strategy continued (2)

Continuum of Care Objectives

The St. Louis County SLC Continuum of Care Plan has five primary objectives; they are as follows:

Increase progress towards ending chronic homelessness:

1. Allocate funds for additional chronic beds
2. Set a goal to prioritize 95% of the PSH beds not dedicated for use by chronically homeless, but available through annual turnover, for use by the chronically homeless.

Increase housing stability:

1. Implement the Coordinated Access and Assessment
2. Best practices for case management and assessment
3. Agencies adopt and implement Housing First model
4. Transitional Housing transition plan (except youth, DV and CD).

Increased income for program participants:

1. Adopt best practices for increasing non-employment income
2. Make sure eligible participants are connected to Supplemental Security Income/ Social Security Disability Benefits

Increase the number of people accessing mainstream benefits:

1. Agencies will participate in training sessions on Mainstream Benefits
2. Enrollment and outreach activities are being implemented to connect eligible households to appropriate Affordable Care Act options.

Expand Rapid Re-housing assistance as a method to reduce family homelessness:

1. Allocate additional resources for Rapid Re-housing
2. Maximize existing Rapid Rehousing resources using 'least touch' model
3. Align CoC rapid re-housing assistance with Emergency Solutions Grant, Supportive Services for Veteran Families, and Family Homeless Prevention Assistance Program
4. Rapid Re-housing programs and develop best practice protocols to be implemented through the Coordinated Access System

SP-65 Lead-based Paint Hazards - 91.415, 91.215(i)

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

In an effort to evaluate and reduce lead-based paint hazards, the County places emphasis on educating the homeowners and tenants of structures built prior to 1978. The County works with its 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.

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

Lead based paint hazards have been reduced in the homes assisted with rehabilitation and the contractors working on these activities have been educated to protect their workers conducting the rehabilitation.

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

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.

SP-70 Anti-Poverty Strategy - 91.415, 91.215(j)

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

St. Louis County's anti-poverty strategy focuses on increasing self-sufficiency for low-income individuals and families. Conditions that are associated with poverty must be addressed in order for individuals to move toward breaking the cycle of poverty and dependence. To enhance the effectiveness of the County's anti-poverty strategy, the County's goals include:

- Coordinate housing programs, and other programs targeted to very-low income individuals, with budgeting skills programs
- Support education and training programs and provide technical assistance to enable unemployed and underemployed men and women start or retain their small businesses to achieve economic self-sufficiency for their families
- Support education and training programs that are geared toward individuals with severe barriers to employment and who have a limited self-directed capability to achieve personal and financial self-sufficiency
- Place priority on funding support to Continuum of Care connected agencies and programs for housing and services to persons who are homeless or at risk of becoming homeless. Identify and challenge other resources to support the continuum of care strategy, homeless prevention, and rapid re-housing efforts
- Place an emphasis on expanding higher wage jobs through fostering private/public partnerships to build on the county's economic base
- Create additional affordable housing options for low-income elderly, persons with special needs, and public housing residents

Results of these efforts will be reported in the Consolidated Annual Performance and Evaluation Report (CAPER).

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

Programs and services are coordinated through collaboration between the County, Consortium, Continuum of Care groups, and the individual agencies that make up these groups. The region has developed interdependent agencies focusing on specific service or housing provision and has little overlap or agency competition due to limited funding sources.

SP-80 Monitoring - 91.230

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

Expected Resources

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

Introduction

The year 1 expected amounts are based upon notification of actual HUD-CPD awards. The expected amounts for the remainder of the Consolidated Plan are forecasted from the 2020 awards.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,979,736	90,000	230,000	2,299,736	8,000,000	

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	548,584	55,000	0	603,584	2,000,000	
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	167,851	0	0	167,851	640,000	

Table 56 - 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 leverages in excess of \$4 for every entitlement dollar meaning an annual estimate of \$9.5-10 million and approximately \$50 million over the five-year plan. 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

n/a

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 Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Housing: Home Ownership Education	2020	2024	Affordable Housing	St. Louis County and the NE Minnesota HOME Consortium	Affordable Housing		Public service activities for Low/Moderate Income Housing Benefit: 150 Households Assisted
2	Housing: Owner and Renter Housing Development	2020	2024	Affordable Housing	St. Louis County and the NE Minnesota HOME Consortium	Affordable Housing	CDBG: \$55,000 HOME: \$77,000	Homeowner Housing Added: 5 Household Housing Unit
3	Housing: Home Ownership Assistance Program	2020	2024	Affordable Housing	St. Louis County and the NE Minnesota HOME Consortium	Affordable Housing	HOME: \$340,111	Direct Financial Assistance to Homebuyers: 50 Households Assisted
4	Housing: Owner-Occupied and Rental Rehabilitation	2020	2024	Affordable Housing	St. Louis County and the NE Minnesota HOME Consortium	Affordable Housing	CDBG: \$325,000	Rental units rehabilitated: 95 Household Housing Unit Homeowner Housing Rehabilitated: 14 Household Housing Unit

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 and the NE Minnesota HOME Consortium	Public Services	CDBG: \$250,000 ESG: \$167,851	Public service activities other than Low/Moderate Income Housing Benefit: 7250 Persons Assisted Tenant-based rental assistance / Rapid Rehousing: 500 Households Assisted Homeless Person Overnight Shelter: 476 Persons Assisted Homelessness Prevention: 250 Persons Assisted
6	Community Facilities: Accessibility	2020	2024	Non-Housing Community Development	St. Louis County and the NE Minnesota HOME Consortium	Community Facilities and Public Infrastructure	CDBG: \$10,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1 Persons Assisted
7	Community Facilities: Improvements	2020	2024	Non-Housing Community Development	St. Louis County and the NE Minnesota HOME Consortium	Community Facilities and Public Infrastructure		
8	Public Infrastructure: Improvements	2020	2024	Non-Housing Community Development	St. Louis County and the NE Minnesota HOME Consortium	Community Facilities and Public Infrastructure	CDBG: \$1,170,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 7920 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
9	Community Facilities: Demolition/Clearance	2020	2024	Non-Housing Community Development	St. Louis County and the NE Minnesota HOME Consortium	Community Facilities and Public Infrastructure	CDBG: \$35,000	Buildings Demolished: 1 Buildings
10	Economic Development: Microenterprise Assistance	2020	2024	Non-Housing Community Development	St. Louis County and the NE Minnesota HOME Consortium	Economic Development	CDBG: \$20,000	Public service activities other than Low/Moderate Income Housing Benefit: 10 Persons Assisted
11	Economic Development: Career Development	2020	2024	Non-Housing Community Development	St. Louis County and the NE Minnesota HOME Consortium	Economic Development	CDBG: \$20,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 15 Persons Assisted

Table 57 – Goals Summary

Goal Descriptions

1	Goal Name	Housing: Home Ownership Education
	Goal Description	Support and maintain access to affordable housing by providing education and counseling to first-time home buyers. Home ownership education is not funded with County or Consortium entitlement funding, but education is a prerequisite component to the direct financial assistance homebuyers receive through the HOME-funded Home Ownership Assistance Program.

2	Goal Name	Housing: Owner and Renter Housing Development
	Goal Description	Improve access to affordable housing through development of owner-occupied and rental housing.
3	Goal Name	Housing: Home Ownership Assistance Program
	Goal Description	Create greater affordability of decent housing by providing financial assistance to first-time home buyers.
4	Goal Name	Housing: Owner-Occupied and Rental Rehabilitation
	Goal Description	Preserve and maintain affordable housing through rehabilitation of owner-occupied and rental housing.
5	Goal Name	Public Services
	Goal Description	Contribute to a more suitable living environment for low- and moderate-income persons through delivery of public services that support core County functions. Priority is placed on those services connected to the Continuum of Care for the homeless.
6	Goal Name	Community Facilities: Accessibility
	Goal Description	Improve public access to community facilities for persons with a physical disability or mobility impairment through ADA-like physical improvements to eligible structures.
7	Goal Name	Community Facilities: Improvements
	Goal Description	Create a more suitable living environment through increased availability of community facilities including community buildings, playgrounds, parks, recreation areas, and trails.
8	Goal Name	Public Infrastructure: Improvements
	Goal Description	Preserve and maintain a more suitable living environment through improvement of public infrastructure.

9	Goal Name	Community Facilities: Demolition/Clearance
	Goal Description	Create a more sustainable living environment through clearance and demolition of slum and blighted property, and through improvement of community facilities.
10	Goal Name	Economic Development: Microenterprise Assistance
	Goal Description	Create greater availability and accessibility to economic opportunity through micro-enterprise education and technical assistance training.
11	Goal Name	Economic Development: Career Development
	Goal Description	Create greater availability and accessibility to economic opportunity through career training for low- and moderate-income persons.

AP-35 Projects - 91.420, 91.220(d)

Introduction

Below is a list of funded projects for 2020.

#	Project Name
1	Access North Center for Independent Living of Northeastern Minnesota: Aging in Place
2	Accessible Space - Winston Court Rehabilitation
3	AEOA Single Family Rehabilitation Loan Program
4	North St. Louis County Habitat for Humanity: Site Acquisition and Rehabilitation
5	One Roof Community Housing - Acquisition-Rehabilitation-Resale Project
6	Vermilion Housing Corporation - Rental Rehabilitation
7	Northeast Entrepreneur Fund - Microenterprise and Small Business Consulting and Lending
8	SOAR Career Solutions - Subsidized Employment Services
9	City of Cook - Community Center Improvements
10	Tourist Center Seniors Citizens, Inc. - Bathroom Rehabilitation Hibbing
11	City of Aurora - Waste Water Treatment Improvements
12	City of Chisholm - Water Main Improvements
13	City of Ely - Infrastructure Improvements
14	City of Eveleth - Infrastructure Improvements
15	City of Floodwood - Elevated Water Storage Tank Improvements
16	City of Gilbert - Infrastructure Improvements
17	City of Hibbing - Infrastructure Improvements
18	City of Meadowlands - Drainage Improvements
19	City of Virginia - Infrastructure Improvements
20	Advocates for Family Peace - Children & Domestic Violence Prevention & Intervention
21	AEOA Homeless Shelter Operations
22	AEOA Homeless Youth Services
23	Chisholm Food Shelf - Food Shelf Operations
24	Legal Aid Service of NE MN - Housing Counseling, Information, and Litigation Project
25	Project Care Free Clinic - Clinic Operations
26	Quad City Food Shelf - Food Shelf Operations
27	Range Transitional Housing - Transitional and Permanent Housing Programs
28	The Salvation Army Hibbing - Melting Pots Meals Program
29	The Salvation Army Virginia - Virginia Supper Club
30	Sexual Assault Program of Northern St. Louis County - Youth Outreach Services
31	St. Louis County Administration
32	HOME: CHDO Set Aside
33	HOME: Home Ownership Assistance Program
34	HOME: General Administration - SLC Consortium

#	Project Name
35	ESG2020 St. Louis County

Table 58 – Project Information

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

AP-38 Project Summary
Project Summary Information

1	Project Name	Access North Center for Independent Living of Northeastern Minnesota: Aging in Place
	Target Area	St. Louis County and the NE Minnesota HOME Consortium
	Goals Supported	Housing: Owner-Occupied and Rental Rehabilitation
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$20,000
	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	10/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	10 low-income families with a family member experiencing a physical disability or mobility impairment.
	Location Description	Services are accessed at 1309 East 40th Street, Hibbing, MN 55746
	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	Accessible Space - Winston Court Rehabilitation
	Target Area	St. Louis County and the NE Minnesota HOME Consortium
	Goals Supported	Housing: Owner-Occupied and Rental Rehabilitation
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$25,000
	Description	Winston Court is an 18 unit apartment complex for persons with a traumatic brain injury, physical disability, or mobility impairment. CDBG funding will aid replacement of kitchen cabinets and counter-tops in 16 units.
	Target Date	10/31/2021

	Estimate the number and type of families that will benefit from the proposed activities	16
	Location Description	710 E 31st Street, Hibbing, MN 55736
	Planned Activities	
3	Project Name	AEOA Single Family Rehabilitation Loan Program
	Target Area	St. Louis County and the NE Minnesota HOME Consortium
	Goals Supported	Housing: Owner-Occupied and Rental Rehabilitation
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$225,000
	Description	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 administers.
	Target Date	10/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	15 low-income families
	Location Description	County-wide, services are accessed at AEOA, 702 South 3rd Avenue, Virginia, MN 55792
4	Planned Activities	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 administers.
	Project Name	North St. Louis County Habitat for Humanity: Site Acquisition and Rehabilitation
	Target Area	St. Louis County and the NE Minnesota HOME Consortium
	Goals Supported	Housing: Owner and Renter Housing Development
	Needs Addressed	Affordable Housing

	Funding	CDBG: \$25,000
	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	10/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	5 low-income families
	Location Description	Contact services at 5558 Enterprise Dr. NE, 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 low-income, first-time homebuyer families on a 0 percent, 30 year mortgage.
5	Project Name	One Roof Community Housing - Acquisition-Rehabilitation-Resale Project
	Target Area	St. Louis County and the NE Minnesota HOME Consortium
	Goals Supported	Housing: Owner and Renter Housing Development
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$25,000
	Description	Acquisition and rehabilitation of one blighted, vacant or foreclosed home targeted for southern St. Louis County (Hermantown, Proctor, and surrounding townships). Resale to first-time homebuyers within One Roofs land trust program provides permanent affordable units.
	Target Date	10/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	1 low-income family
	Location Description	One Roof Community Housing, 12 East 4th Street, Duluth, MN 55805

	Planned Activities	Acquisition and rehabilitation of one blighted, vacant or foreclosed home targeted for southern St. Louis County (Hermantown, Proctor, and surrounding townships). Resale to first-time homebuyers within One Roof's land trust program provides permanent affordable units.
6	Project Name	Vermilion Housing Corporation - Rental Rehabilitation
	Target Area	St. Louis County and the NE Minnesota HOME Consortium
	Goals Supported	Housing: Owner-Occupied and Rental Rehabilitation
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$18,000
	Description	Vermilion Housing owns 52 affordable rental units in Tower and Soudan. Project consists of updating 14 units with new stoves and refrigerators.
	Target Date	10/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	14 low-income families
	Location Description	Soudan units (12): 25 1st Avenue, Soudan, MN 55782 Tower units (40): 101 Cedar Street, Tower, MN 55790
7	Planned Activities	Vermilion Housing owns 52 affordable rental units in Tower and Soudan. Project consists of updating 14 units with new stoves and refrigerators.
	Project Name	Northeast Entrepreneur Fund - Microenterprise and Small Business Consulting and Lending
	Target Area	St. Louis County and the NE Minnesota HOME Consortium
	Goals Supported	Economic Development: Microenterprise Assistance
	Needs Addressed	Economic Development
	Funding	CDBG: \$20,000
	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	10/31/2021

	Estimate the number and type of families that will benefit from the proposed activities	10 self-employed families
	Location Description	Entrepreneur Fund, 551 Hat Trick Avenue, Eveleth, MN 55734
	Planned Activities	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.
8	Project Name	SOAR Career Solutions - Subsidized Employment Services
	Target Area	St. Louis County and the NE Minnesota HOME Consortium
	Goals Supported	Economic Development: Career Development
	Needs Addressed	Economic Development
	Funding	CDBG: \$20,000
	Description	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.
	Target Date	10/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	15 low-income families
	Location Description	Southern St. Louis County focused outside the Duluth city limits. Services are provided at 205 West 2nd St., Ste. 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 Cook - Community Center Improvements
	Target Area	St. Louis County and the NE Minnesota HOME Consortium
	Goals Supported	Community Facilities: Improvements
	Needs Addressed	Community Facilities and Public Infrastructure
	Funding	CDBG: \$25,000
	Description	Project will provide accessible entry doors, bathroom modifications, and signage to improve access for persons with a physical disability or mobility impairment.
	Target Date	10/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	1 - Families with a member experiencing a physical disability or mobility impairment
	Location Description	City of Cook Community Center – 510 Gopher Dr, Cook, MN 55723
	Planned Activities	Project will provide accessible entry doors, bathroom modifications, and signage to improve access for persons with a physical disability or mobility impairment.
10	Project Name	Tourist Center Seniors Citizens, Inc. - Bathroom Rehabilitation Hibbing
	Target Area	St. Louis County and the NE Minnesota HOME Consortium
	Goals Supported	Community Facilities: Accessibility
	Needs Addressed	Community Facilities and Public Infrastructure
	Funding	CDBG: \$12,000
	Description	Rehabilitation of the senior center bathrooms to include improved access for persons with a physical disability or mobility impairment.
	Target Date	10/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	1 -The Senior Center has approximately 150 members.
	Location Description	1202 E. Howard Street, Hibbing, MN 55746
	Planned Activities	Rehabilitation of the senior center bathrooms to include improved access for persons with a physical disability or mobility impairment.

11	Project Name	City of Aurora - Waste Water Treatment Improvements
	Target Area	St. Louis County and the NE Minnesota HOME Consortium
	Goals Supported	Public Infrastructure: Improvements
	Needs Addressed	Community Facilities and Public Infrastructure
	Funding	CDBG: \$170,000
	Description	System improvements to the primary digester, cover and walls, and modifications to the existing sludge and gas piping systems. Installation of updated controls and instrumentation to improve operations, monitoring, and safety to staff and facility.
	Target Date	10/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	All residents of the City of Aurora - 1665
	Location Description	5378 Hwy 110, Aurora, MN 55705
	Planned Activities	System improvements to the primary digester, cover and walls, and modifications to the existing sludge and gas piping systems. Installation of updated controls and instrumentation to improve operations, monitoring, and safety to staff and facility.
12	Project Name	City of Chisholm - Water Main Improvements
	Target Area	St. Louis County and the NE Minnesota HOME Consortium
	Goals Supported	Public Infrastructure: Improvements
	Needs Addressed	Community Facilities and Public Infrastructure
	Funding	CDBG: \$50,000
	Description	Project consists of looping of the water main along CSAH #67 (4th Ave SE) to improve water quality and flow pressure for residents and increase fire-flow pressure for public safety.
	Target Date	10/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	2245 people

	Location Description	301 4th Ave SE, Chisholm, MN 55719
	Planned Activities	Project consists of looping of the water main along CSAH #67 (4th Ave SE) to improve water quality and flow pressure for residents and increase fire-flow pressure for public safety.
13	Project Name	City of Ely - Infrastructure Improvements
	Target Area	St. Louis County and the NE Minnesota HOME Consortium
	Goals Supported	Public Infrastructure: Improvements
	Needs Addressed	Community Facilities and Public Infrastructure
	Funding	CDBG: \$145,000
	Description	Water, sanitary sewer, and street reconstruction along James Street between Central Ave and 8th Ave East. Project is coordinated with St. Louis County Public Works.
	Target Date	10/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	1505 people
	Location Description	James Street between Central Ave and 8th Ave E within the City of Ely, MN
	Planned Activities	Water, sanitary sewer, and street reconstruction along James Street between Central Ave and 8th Ave East. Project is coordinated with St. Louis County Public Works.
14	Project Name	City of Eveleth - Infrastructure Improvements
	Target Area	St. Louis County and the NE Minnesota HOME Consortium
	Goals Supported	Public Infrastructure: Improvements
	Needs Addressed	Community Facilities and Public Infrastructure
	Funding	CDBG: \$120,000
	Description	Removal and replacement of the water main, sanitary sewer main, and storm sewer on the 400 block of Garfield Street.
	Target Date	10/31/2021

	Estimate the number and type of families that will benefit from the proposed activities	365 people
	Location Description	400 Block of Garfield Street, Eveleth, MN 55734
	Planned Activities	Removal and replacement of the water main, sanitary sewer main, and storm sewer on the 400 block of Garfield Street.
15	Project Name	City of Floodwood - Elevated Water Storage Tank Improvements
	Target Area	St. Louis County and the NE Minnesota HOME Consortium
	Goals Supported	Public Infrastructure: Improvements
	Needs Addressed	Community Facilities and Public Infrastructure
	Funding	CDBG: \$165,000
	Description	Interior and exterior rehabilitation of the city's water storage tank.
	Target Date	10/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	Residents of the City of Floodwood - 470
	Location Description	106 Railroad St W, Floodwood, MN 55736
	Planned Activities	Interior and exterior rehabilitation of the city's water storage tank.
16	Project Name	City of Gilbert - Infrastructure Improvements
	Target Area	St. Louis County and the NE Minnesota HOME Consortium
	Goals Supported	Public Infrastructure: Improvements
	Needs Addressed	Community Facilities and Public Infrastructure
	Funding	CDBG: \$170,000
	Description	Lower Michigan and Indiana Ave replacement of old and deteriorated water main, sanitary sewer, and storm sewer.
	Target Date	10/31/2021

	Estimate the number and type of families that will benefit from the proposed activities	530 people
	Location Description	Lower Michigan and Indiana Ave, Gilbert, MN 55741
	Planned Activities	Lower Michigan and Indiana Ave replacement of old and deteriorated water main, sanitary sewer, and storm sewer.
17	Project Name	City of Hibbing - Infrastructure Improvements
	Target Area	St. Louis County and the NE Minnesota HOME Consortium
	Goals Supported	Public Infrastructure: Improvements
	Needs Addressed	Community Facilities and Public Infrastructure
	Funding	CDBG: \$206,789
	Description	Phase 8 rehabilitation of sanitary sewer pipe by placing a structural liner in approximately 14,000 feet of piping in LMI areas in the city. The project will reduce sanitary sewer failures and backups and reduce inflow and infiltration entering the city treatment facility. Locations: Alley of 11th St E between 12th Ave E and 17th Ave E, and Alleys between 5th Ave W and 1st Ave W and 25th St and 31st St.
	Target Date	10/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	1600 people
	Location Description	City of Hibbing Locations: Alley of 11th St E between 12th Ave E and 17th Ave E, and Alleys between 5th Ave W and 1st Ave W and 25th St and 31st St.
18	Planned Activities	Phase 8 rehabilitation of sanitary sewer pipe by placing a structural liner in approximately 14,000 feet of piping in LMI areas in the city. The project will reduce sanitary sewer failures and backups and reduce inflow and infiltration entering the city treatment facility. Locations: Alley of 11th St E between 12th Ave E and 17th Ave E, and Alleys between 5th Ave W and 1st Ave W and 25th St and 31st St.
	Project Name	City of Meadowlands - Drainage Improvements
	Target Area	St. Louis County and the NE Minnesota HOME Consortium

	Goals Supported	Public Infrastructure: Improvements
	Needs Addressed	Community Facilities and Public Infrastructure
	Funding	CDBG: \$35,000
	Description	Ditching, culvert replacement, and storm sewer rehabilitation along Spruce, Cedar, and Elm Streets.
	Target Date	10/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	85 people
	Location Description	Spruce, Cedar, and Elm Streets, Meadowlands, MN 55765
	Planned Activities	Ditching, culvert replacement, and storm sewer rehabilitation along Spruce, Cedar, and Elm Streets.
19	Project Name	City of Virginia - Infrastructure Improvements
	Target Area	St. Louis County and the NE Minnesota HOME Consortium
	Goals Supported	Public Infrastructure: Improvements
	Needs Addressed	Community Facilities and Public Infrastructure
	Funding	CDBG: \$170,000
	Description	Sanitary sewer, storm sewer, water main, and street reconstruction along 10th Street South from South 2nd Avenue West to Railroad Avenue.
	Target Date	10/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	850 people
	Location Description	10th Street South between 2nd Ave and Railroad Ave within the City of Virginia, MN 55792
20	Planned Activities	Sanitary sewer, storm sewer, water main, and street reconstruction along 10th Street South from South 2nd Avenue West to Railroad Avenue.
	Project Name	Advocates for Family Peace - Children & Domestic Violence Prevention & Intervention
	Target Area	St. Louis County and the NE Minnesota HOME Consortium

	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$18,000
	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	10/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	150 families
	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.
21	Project Name	AEOA Homeless Shelter Operations
	Target Area	St. Louis County and the NE Minnesota HOME Consortium
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$43,000
	Description	The only 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	10/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	125 homeless households
	Location Description	Bill's House (AEOA), 210 3rd Street N, Virginia, MN 55792

	Planned Activities	The only 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.
22	Project Name	AEOA Homeless Youth Services
	Target Area	St. Louis County and the NE Minnesota HOME Consortium
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$23,000
	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	10/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	50 homeless youth
	Location Description	AEOA Homeless Youth Services, 302 12th Street South, Virginia, MN 55792
23	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.
	Project Name	Chisholm Food Shelf - Food Shelf Operations
	Target Area	St. Louis County and the NE Minnesota HOME Consortium
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$15,000

	Description	Assistance with salary for a part-time coordinator/manager for the food shelf program. The Chisholm Food Shelf serves the areas of Hibbing, Chisholm, Balkan, Side Lake, Britt, Buhl, and Kinney through its on-site location and mobile distribution. The organization purchased a van that travels to various rural locations in its service area. The program is operated primarily with volunteers.
	Target Date	10/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	7200 families
	Location Description	208 W Lake St, Chisholm, MN 55719
	Planned Activities	Assistance with salary for a part-time coordinator/manager for the food shelf program. The Chisholm Food Shelf serves the areas of Hibbing, Chisholm, Balkan, Side Lake, Britt, Buhl, and Kinney through its on-site location and mobile distribution. The organization purchased a van that travels to various rural locations in its service area. The program is operated primarily with volunteers.
24	Project Name	Legal Aid Service of NE MN - Housing Counseling, Information, and Litigation Project
	Target Area	St. Louis County and the NE Minnesota HOME Consortium
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$33,000
	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	10/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	250 families
	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	St. Louis County and the NE Minnesota HOME Consortium
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$15,000
	Description	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.
	Target Date	10/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	1800 people
	Location Description	3112 6th Ave East, Hibbing, MN 55746 230 1st Street, 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 - Food Shelf Operations
	Target Area	St. Louis County and the NE Minnesota HOME Consortium
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$13,000
	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.

	Target Date	10/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	15,564 people
	Location Description	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.
27	Project Name	Range Transitional Housing - Transitional and Permanent Housing Programs
	Target Area	St. Louis County and the NE Minnesota HOME Consortium
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$40,000
	Description	Only full term transitional housing program for homeless families in rural St. Louis County and an essential component of the Continuum of Care. Funds will support case management and operations.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	70 families
	Location Description	220 5th Street North, Virginia, MN 55792
	Planned Activities	Only full term transitional housing program for homeless families in rural St. Louis County and an essential component of the Continuum of Care. Funds will support case management and operations.
28	Project Name	The Salvation Army Hibbing - Melting Pots Meals Program
	Target Area	St. Louis County and the NE Minnesota HOME Consortium
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$17,000

	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	10/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	3000 families
	Location Description	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 full-time 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	St. Louis County and the NE Minnesota HOME Consortium
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$17,000
	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	10/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	3000 families
	Location Description	507 12th Ave 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	St. Louis County and the NE Minnesota HOME Consortium
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$23,000
	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	10/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	150 families
	Location Description	327 1st Street S, Ste. 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	St. Louis County Administration
	Target Area	St. Louis County and the NE Minnesota HOME Consortium
	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 Community Facilities: Accessibility Community Facilities: Improvements Public Infrastructure: Improvements Community Facilities: Demolition/Clearance Economic Development: Microenterprise Assistance Economic Development: Career Development
	Needs Addressed	Affordable Housing Economic Development Community Facilities and Public Infrastructure Public Services

	Funding	CDBG: \$395,947
	Description	Provide for general administration of the CDBG program.
	Target Date	10/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	1
	Location Description	201 South 3rd Avenue West, Virginia, MN 55792
	Planned Activities	Provide for general administration of the CDBG program.
32	Project Name	HOME: CHDO Set Aside
	Target Area	St. Louis County and the NE Minnesota HOME Consortium
	Goals Supported	Housing: Owner and Renter Housing Development
	Needs Addressed	Affordable Housing
	Funding	HOME: \$82,288
	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	10/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	12 families in transitional housing and 1 first-time homebuyer family
	Location Description	Transitional housing - Eveleth, MN Homebuyer housing - location to be determined
	Planned Activities	Rehabilitation of 12 units of transitional housing for the homeless and acquisition/rehab/resale of homebuyer housing for a first-time homebuyer.
33	Project Name	HOME: Home Ownership Assistance Program
	Target Area	St. Louis County and the NE Minnesota HOME Consortium
	Goals Supported	Housing: Home Ownership Assistance Program
	Needs Addressed	Affordable Housing
	Funding	HOME: \$390,000

	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	10/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	65 first-time homebuyer families
	Location Description	Various locations throughout the 5-county HOME Consortium made up of Cook, Itasca, Koochiching, Lake, and St. Louis counties
	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.
34	Project Name	HOME: General Administration - SLC Consortium
	Target Area	St. Louis County and the NE Minnesota HOME Consortium
	Goals Supported	Housing: Owner and Renter Housing Development Housing: Home Ownership Assistance Program Housing: Owner-Occupied and Rental Rehabilitation
	Needs Addressed	Affordable Housing
	Funding	HOME: \$54,858
	Description	Administrative funding allocated to St. Louis County as lead entity for the HOME Consortium.
	Target Date	10/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	1
	Location Description	201 South 3rd Avenue West, Virginia, MN 55792
	Planned Activities	Administrative funding allocated to St. Louis County as lead entity for the HOME Consortium.

35	Project Name	ESG2020 St. Louis County
	Target Area	St. Louis County and the NE Minnesota HOME Consortium
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	ESG: \$167,851
	Description	Allocations will be made to nonprofit agencies that provide emergency shelter and services consistent with the County's Continuum of Care Plan.
	Target Date	10/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	470 families connected to the St. Louis County Continuum of Care through homelessness or homelessness prevention.
	Location Description	County-wide
	Planned Activities	Allocations will be made to nonprofit agencies that provide emergency shelter and services consistent with the County's Continuum of Care Plan.

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

The CDBG & ESG entitlement area is comprised of St. Louis County (excluding the City of Duluth as they are their own entitlement). The HOME entitlement area is the Northeastern Minnesota HOME Consortium, which includes St. Louis, Koochiching, Itasca, Cook and Lake Counties.

Geographic Distribution

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

Table 59 - 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 allocation process. A HOME advisory board, 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 review and input from advisory group of public service providers and endorsement by the Continuum of Care Leadership Council. 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	12
Non-Homeless	141
Special-Needs	0
Total	153

Table 60 - 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	3
Rehab of Existing Units	84
Acquisition of Existing Units	66
Total	153

Table 61 - One Year Goals for Affordable Housing by Support Type

Discussion

Since 2000, rental and home prices have increased tremendously across the Consortium. Rental units have had increases between 2% to 24%, while income for renters have either gone down by 16% or had a small 6% increase depending on the region. This makes it tough for renters to save up enough money to move to a better unit or buy their own home. Home prices have increased much more dramatically between 20% and 59% increase over the same time period. Homeowner income has fared a little better compared to renters with as low as a 4% drop to a 4% increase depending on the region. With the increasing housing costs and lower income, that limits the expendable income to these individuals and families. The dream of homeownership is becoming more and more challenging across the consortium. Times like this makes the supportive services in our communities more important as families have to decide to pay for rent or put food on their tables.

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

Introduction

The geographic boundaries of the County and Consortium incorporates 12 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.

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 most recently focused on assisting the homeless through Continuum of Care priorities. The region's PHAs are a vital component of the homelessness housing response.

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.

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 covered by one Continuum of Care but encompasses two HUD entitlement jurisdictions – St. Louis County and the City of Duluth. The County and City have a history of working together with homeless housing and service providers to address issues that impact persons who are homeless or at-risk of becoming homeless.

In 2007, joint efforts between the City and County, along with homeless housing and service providers produced a business plan to end homelessness called Heading Home St. Louis County, a Ten Year Plan to Prevent and End Homelessness in St. Louis County. The goal of the Ten-Year Plan and the Continuum of Care is to help homeless individuals, families and youth to be rapidly re-housed in the most permanent housing possible, increase their housing stability and the housing security that goes along with stability, and to prevent new occurrences of homelessness. With the understanding that homelessness is not caused merely by lack of shelter, but rather involves underlying, unmet physical, economic and social needs, the supportive services provided for the homeless are designed to meet those needs.

City and County collaboration during 2014 remained strong with continued focus on the HEARTH regulations and related activities to develop a coordinated homeless response system that incorporates new prevention, rapid housing and coordinated assessment activities outlined in the new Emergency Solutions Grant regulations and the new Continuum of Care regulations along with former shelter (including transitional housing) outreach and supportive service activities. The Heading Home St. Louis County Leadership Council is the governing and advisory board that oversees the activities of the 10 Year Plan and other homeless initiatives in Duluth and SLC, including the annual CoC funding competition, the Family Homeless Prevention and Assistance Program (FHPAP) state funding competition in SLC and the Emergency Solutions Grant Program funding process for both Duluth and SLC.

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 access. The service providers have agreed under a coordinated access system to 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 looking to receiving housing assistance will first undergo a pre-screen administered by 2-1-1 United Way. This first step will help with prevention and diversion and refer those in need to emergency shelter. The client will then be administered the Vulnerability Index (VI) SPDAT at determined entry points. This is a quick, condensed

version of the SPDAT and will give the recipient an acuity score which will determine the appropriate housing solution. The score will assist with matching client need to housing placement. The most vulnerable individuals receive priority for housing.

Once matched with the appropriate housing, the client's case manager will administer the SPDAT. The SPDAT measures a variety of issues that can effects a person's stability. The categories can be tracked over time as the SPDAT is administered 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 Access System will provide 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 Coordinated Access 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, the goal is to place the client into permanent housing or at least keep the person in transition 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 Leadership Council 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 assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

The St. Louis County Ten-Year Plan to End Homelessness includes a goal to establish uniform discharge protocols and procedures that prevent people who are being released from county institutions from being discharged into homelessness. An Adult Protocol Business Plan was completed in 2008. 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.

In 2010, St. Louis County received funding to conduct a pilot project with County correctional facilities to implement the discharge plan. Implementation of the project went well, but no new funds were allocated toward discharge planning activities once the pilot project ended. However, many of the established protocols implemented under the pilot continue to be used. No additional work has been done regarding discharge planning, however, discharge activities will be reviewed as the city and county work toward transitioning the homeless response system under the SLC Continuum of Care to align with the HEARTH Act goals.

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 2020 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 2020 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 low- and moderate-income households for eligible property improvements in St. Louis County.
- HOME CHDO Set-Aside funding to the Arrowhead Economic Opportunity Agency will assist with rehabilitation of homeless transitional housing units. Funding to 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 One Roof Community Housing is proposed for acquisition, rehabilitation, and resale of one home using the land trust model.
- 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.
- CDBG funding to the Vermilion Housing rental units in Soudan will undergo rehabilitation to sustain these affordable units.
- CDBG funding to Accessible Space – Winston Court rental units in Hibbing will rehabilitate 16 of the 18 units to extend the life of the affordable fully ADA compliant units.

Discussion

No further discussion.

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

See section SP-65

Actions planned to reduce the number of poverty-level families

Activities funded in the 2020 Action Plan that support poverty-level families are as follows:

- Vermillion Housing rental rehabilitation

- 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
- 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 and Chisholm Food Shelves

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 2020 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	25,000
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:	25,000

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.	96.70%

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

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

No other forms of investment, beyond those noted in 24 CFR 92.205(b), have been identified to be used in conjunction with the Consortium's FY 2020 HOME Program.

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)
Reference 91.220(l)(4)

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) coordinated with housing and service providers to develop a collaborative system to reach out to the homeless. An integral part of the system is coordinated entry and assessment. The service providers implemented a coordinated entry and assessment system to 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 looking to receiving housing assistance first undergo a pre-screen administered by 2-1-1 United Way. This first step assists with prevention and diversion and referral of those in need to emergency

shelter. The client is then be administered the Vulnerability Index (VI) SPDAT at determined entry points. This is a quick, condensed version of the SPDAT and will give the recipient an acuity score which will determine the appropriate housing solution. The score will assist with matching client need to housing placement. The most vulnerable individuals receive priority for housing.

Once matched with the appropriate housing, the client's case manager administers the SPDAT. The SPDAT measures a variety of issues that can effects a person's stability. The categories can be tracked over time as the SPDAT is administered 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
- Heading Home SLC Leadership Council

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 Legal Aid's assistance 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

No further discussion.

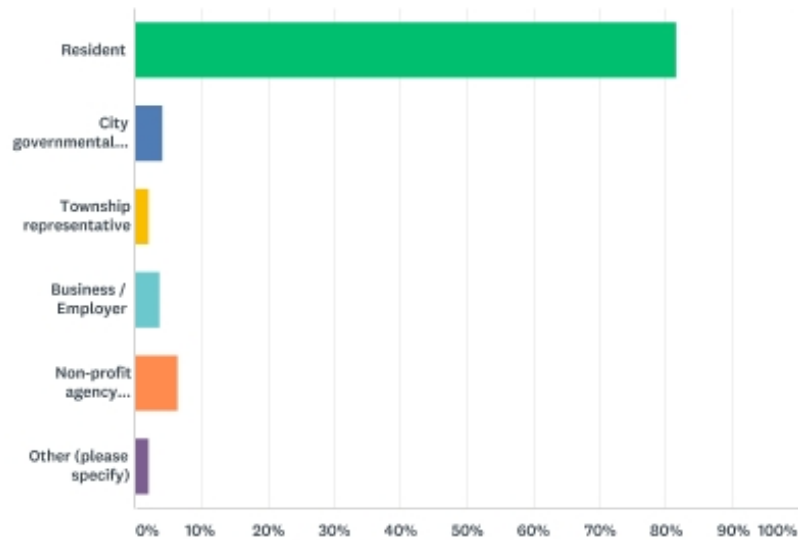
Attachments

Grantee Unique Appendices

St. Louis County Consolidated Plan Survey

Q1 From what perspective are you completing this survey?

Answered: 244 Skipped: 0

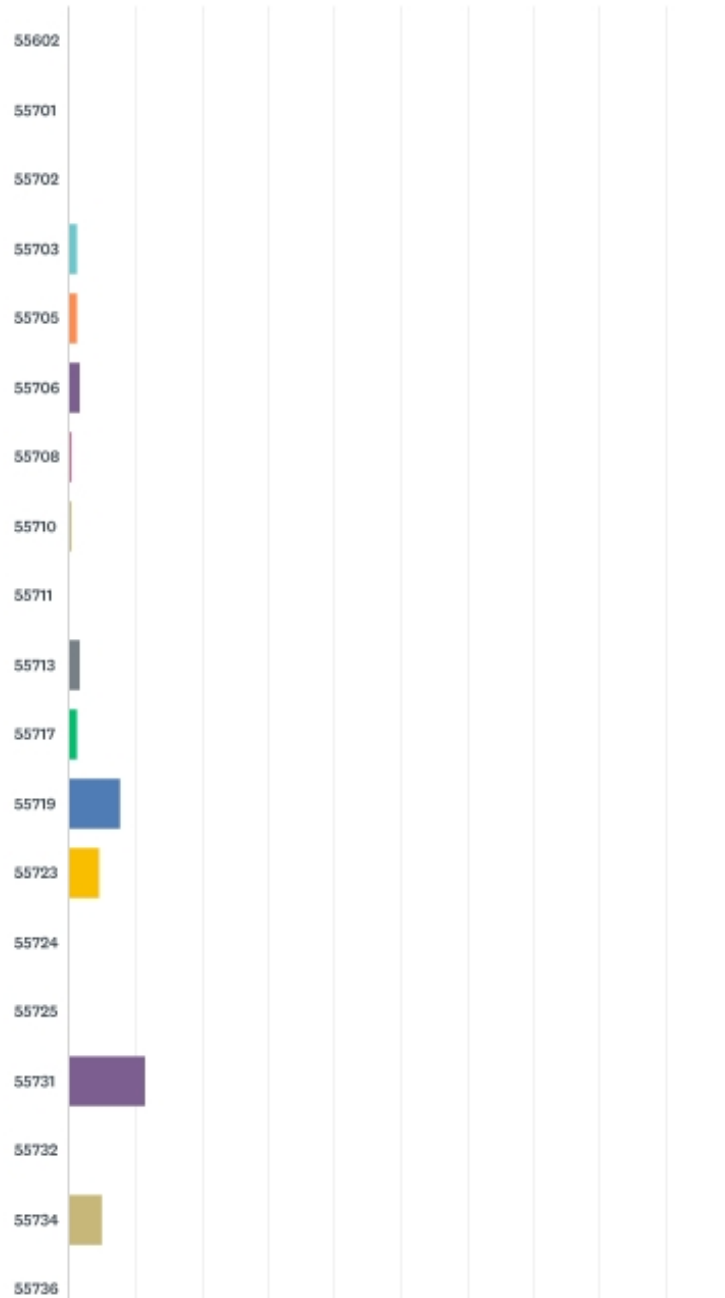


ANSWER CHOICES	RESPONSES	
Resident	81.56%	199
City governmental representative	4.10%	10
Township representative	2.05%	5
Business / Employer	3.69%	9
Non-profit agency representative	6.56%	16
Other (please specify)	2.05%	5
TOTAL		244

St. Louis County Consolidated Plan Survey

Q2 What is your zip code?

Answered: 243 Skipped: 1



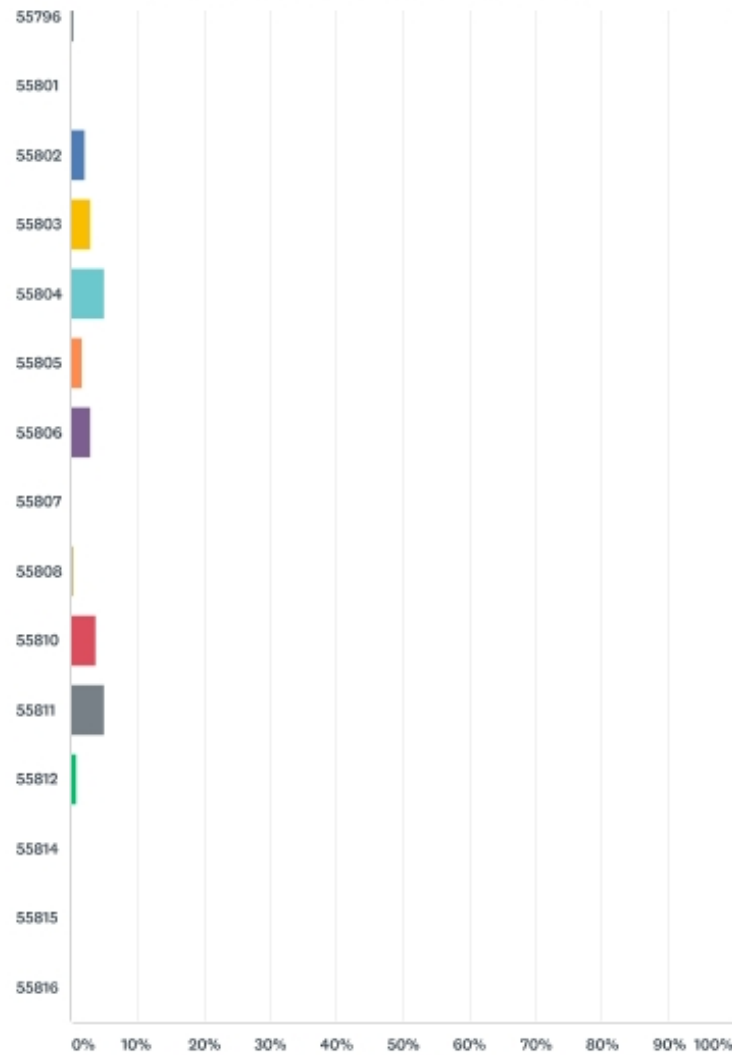
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St. Louis County Consolidated Plan Survey



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St. Louis County Consolidated Plan Survey



ANSWER CHOICES	RESPONSES	
55602	0.00%	0
55701	0.00%	0
55702	0.00%	0
55703	1.23%	3
55705	1.23%	3
55706	1.65%	4
55708	0.41%	1

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St. Louis County Consolidated Plan Survey

55710	0.41%	1
55711	0.00%	0
55713	1.65%	4
55717	1.23%	3
55719	7.82%	19
55723	4.53%	11
55724	0.00%	0
55725	0.00%	0
55731	11.52%	28
55732	0.00%	0
55734	4.94%	12
55736	0.00%	0
55738	0.00%	0
55741	1.65%	4
55746	16.05%	39
55747	0.00%	0
55750	0.00%	0
55751	0.41%	1
55758	0.00%	0
55763	0.41%	1
55765	0.00%	0
55766	0.00%	0
55768	1.65%	4
55771	1.23%	3
55772	0.00%	0
55777	0.00%	0
	0.00%	0
55779		
55781	1.65%	4
55782	0.82%	2
55790	2.06%	5
55791	0.00%	0
55792	10.70%	26
55796	0.41%	1
55801	0.00%	0

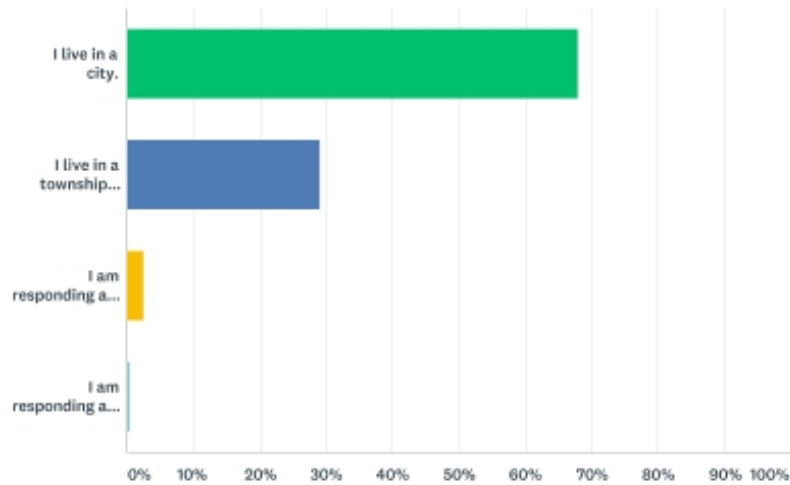
St. Louis County Consolidated Plan Survey

55802	2.06%	5
55803	2.88%	7
55804	4.94%	12
55805	1.65%	4
55806	2.88%	7
55807	0.00%	0
55808	0.41%	1
55810	3.70%	9
55811	4.94%	12
55812	0.82%	2
55814	0.00%	0
55815	0.00%	0
55816	0.00%	0
TOTAL		243

St. Louis County Consolidated Plan Survey

Q3 Do you live in a city or township (if not in city limits)?

Answered: 244 Skipped: 0

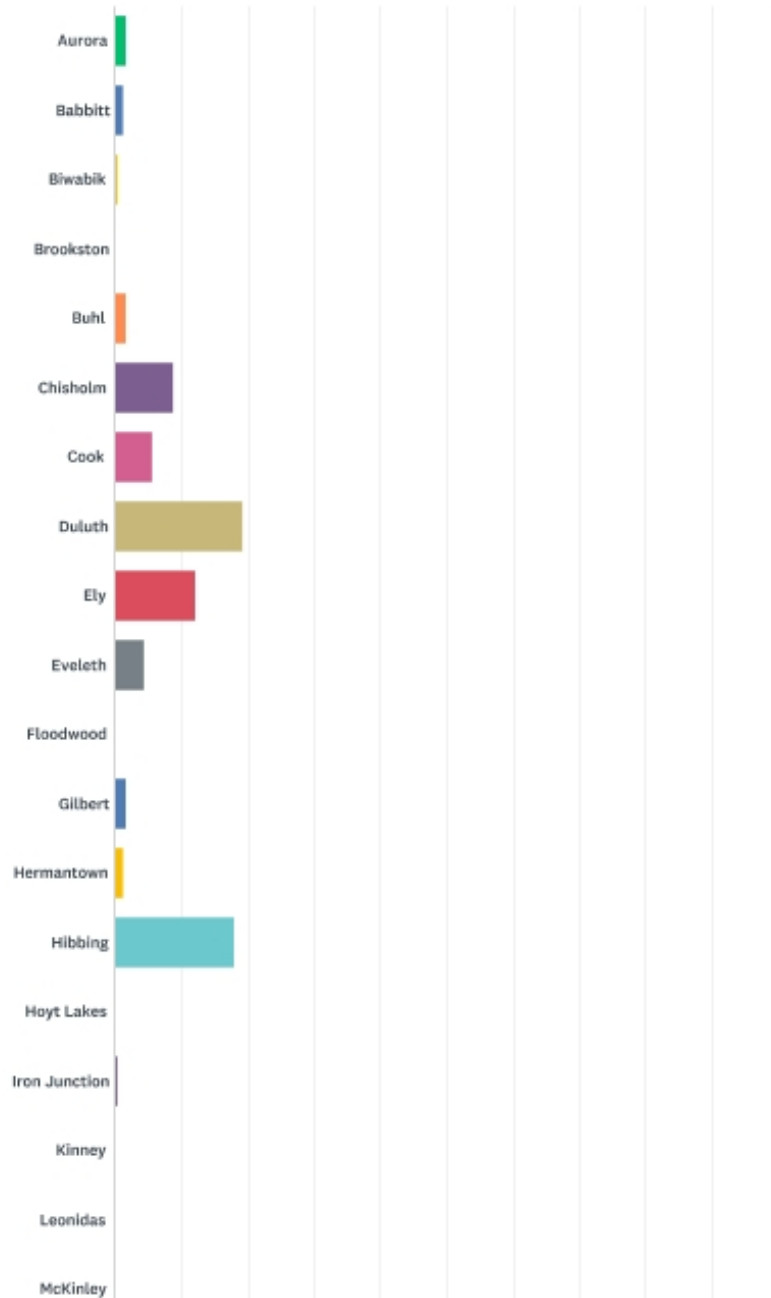


ANSWER CHOICES	RESPONSES	
I live in a city.	68.03%	166
I live in a township (outside of city limits).	29.10%	71
I am responding as a non-profit agency	2.46%	6
I am responding as a business owner/employer	0.41%	1
TOTAL		244

St. Louis County Consolidated Plan Survey

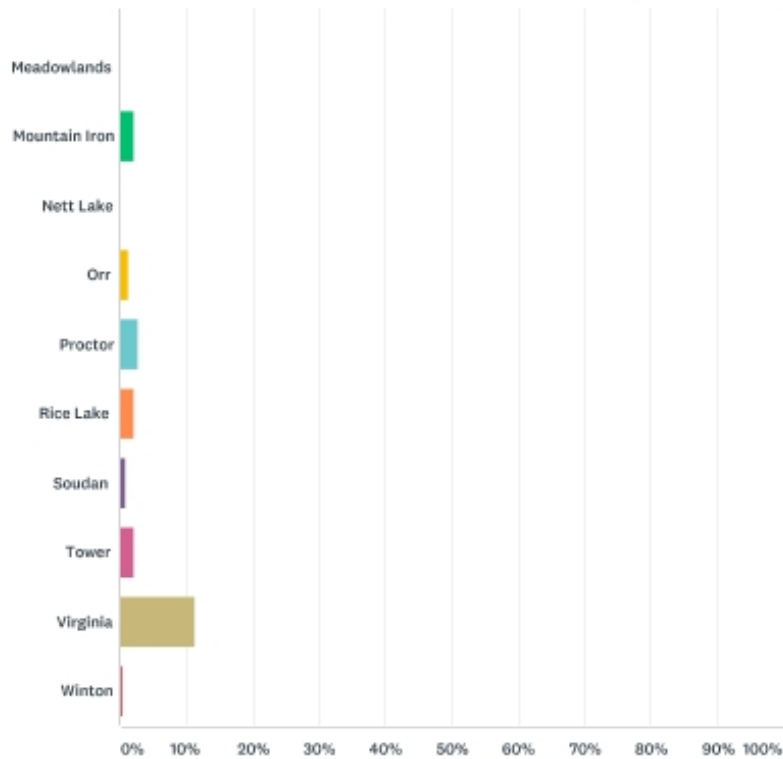
Q4 What is your city?

Answered: 229 Skipped: 15



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St. Louis County Consolidated Plan Survey



ANSWER CHOICES	RESPONSES	
Aurora	1.75%	4
Babbitt	1.31%	3
Biwabik	0.44%	1
Brookston	0.00%	0
Buhl	1.75%	4
Chisholm	8.73%	20
Cook	5.68%	13
Duluth	19.21%	44
Ely	12.23%	28
Eveleth	4.37%	10
Floodwood	0.00%	0
Gilbert	1.75%	4
Hermantown	1.31%	3
Hibbing	17.90%	41

St. Louis County Consolidated Plan Survey

Hoyt Lakes	0.00%	0
Iron Junction	0.44%	1
Kinney	0.00%	0
Leonidas	0.00%	0
McKinley	0.00%	0
Meadowlands	0.00%	0
Mountain Iron	2.18%	5
Nett Lake	0.00%	0
Orr	1.31%	3
Proctor	2.62%	6
Rice Lake	2.18%	5
Soudan	0.87%	2
Tower	2.18%	5
Virginia	11.35%	26
Winton	0.44%	1
TOTAL		229

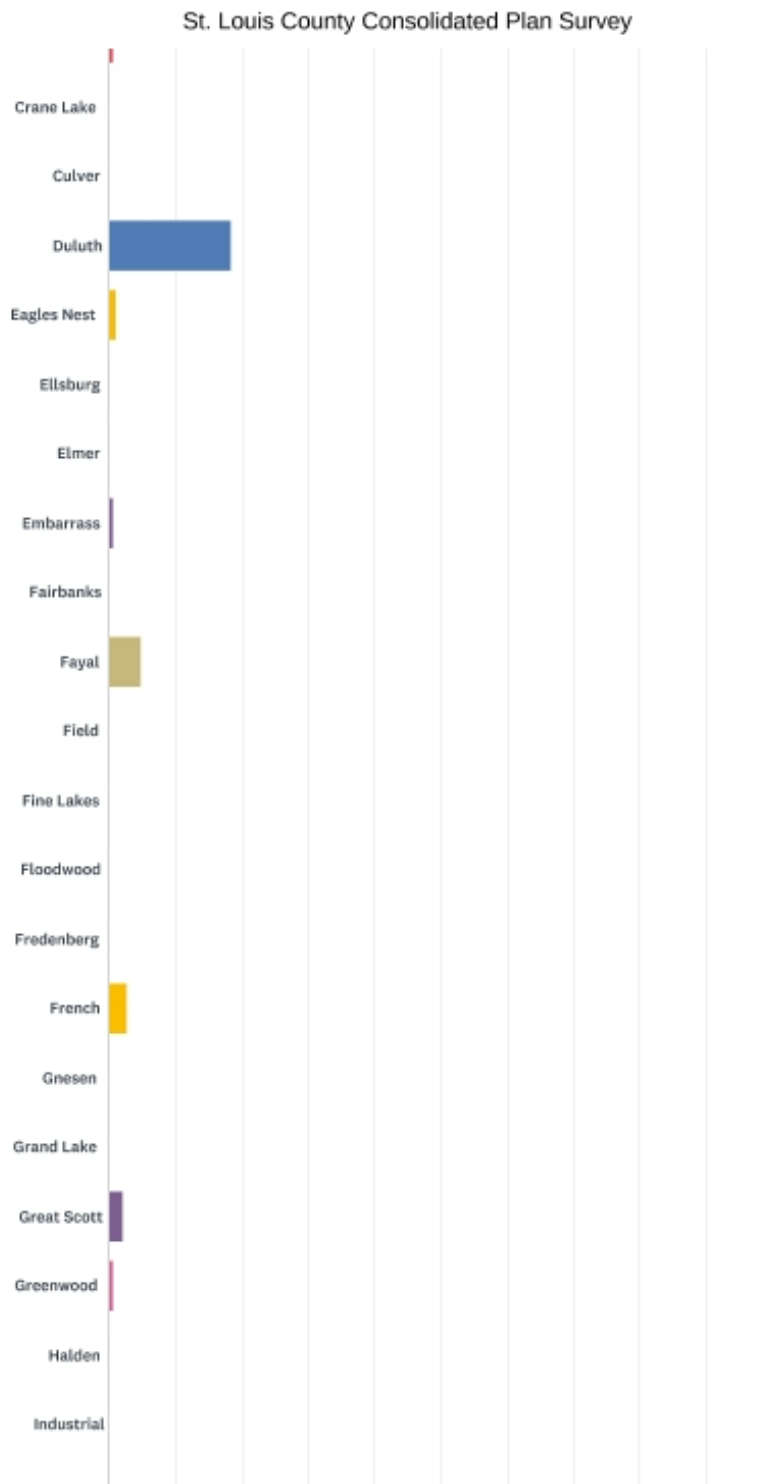
St. Louis County Consolidated Plan Survey

Q5 What is your township (outside of city limits)?

Answered: 184 Skipped: 60

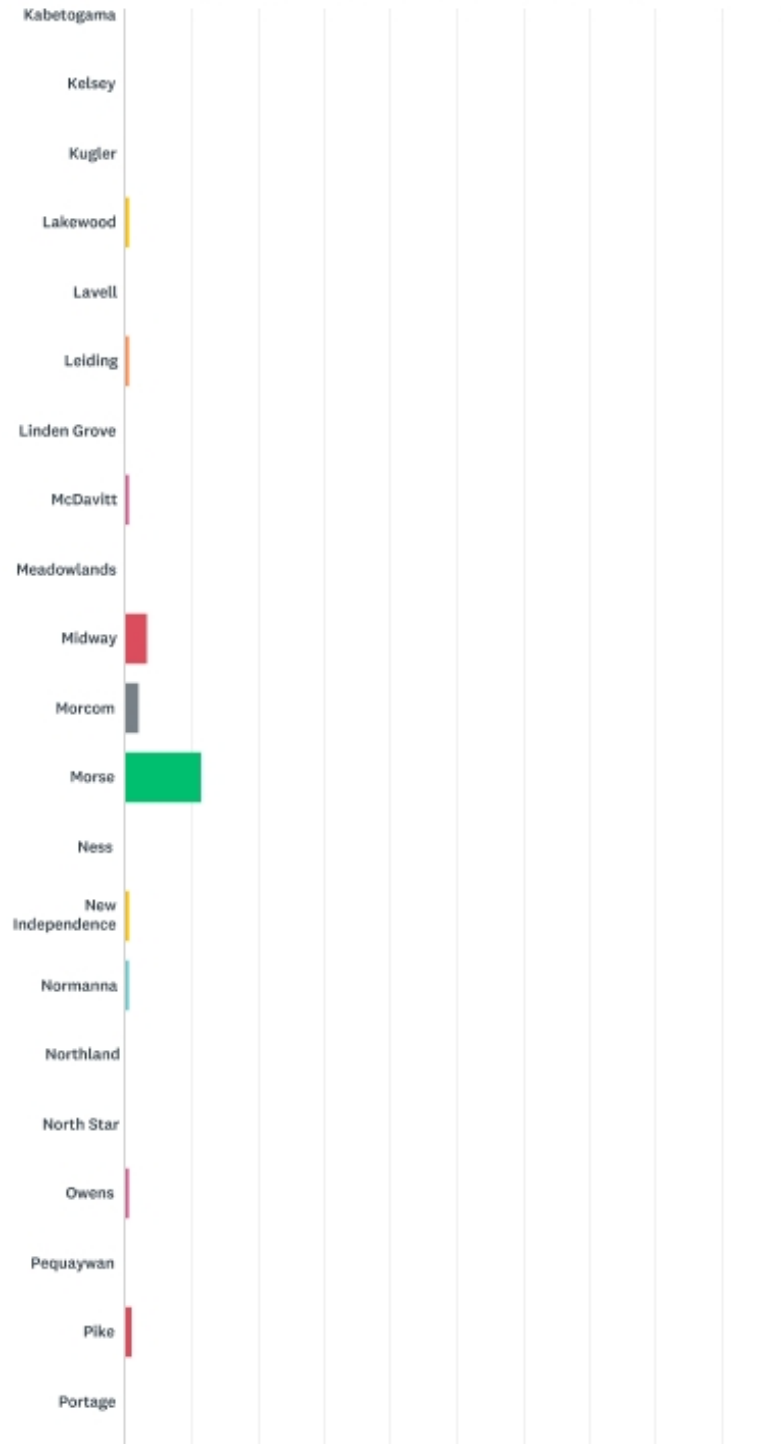


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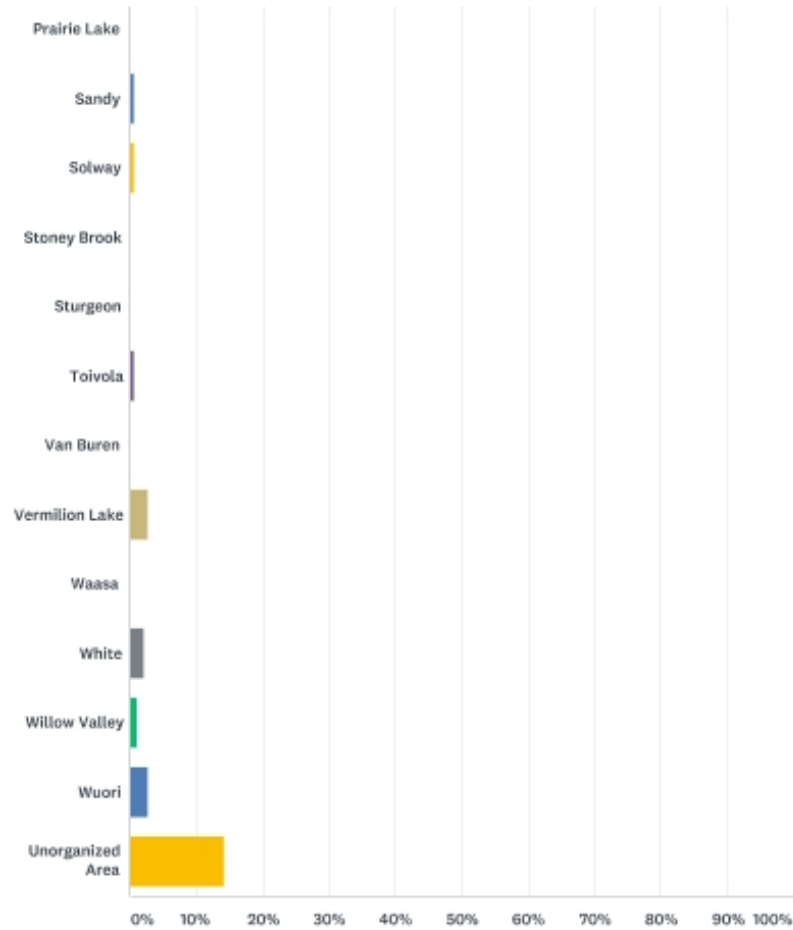
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St. Louis County Consolidated Plan Survey



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St. Louis County Consolidated Plan Survey



ANSWER CHOICES	RESPONSES	
Alango	0.00%	0
Alborn	1.09%	2
Alden	0.00%	0
Angora	2.17%	4
Arrowhead	1.63%	3
Ault	0.00%	0
Balkan	10.33%	19
Bassett	0.00%	0
Beatty	2.17%	4
Biwabik	1.09%	2

St. Louis County Consolidated Plan Survey

Breitung	1.09%	2
Brevator	0.54%	1
Camp Five	0.00%	0
Canosia	1.09%	2
Cedar Valley	0.00%	0
Cherry	1.63%	3
Clinton	0.54%	1
Colvin	0.00%	0
Cotton	0.54%	1
Crane Lake	0.00%	0
Culver	0.00%	0
Duluth	18.48%	34
Eagles Nest	1.09%	2
Ellsburg	0.00%	0
Elmer	0.00%	0
Embarrass	0.54%	1
Fairbanks	0.00%	0
Fayal	4.89%	9
Field	0.00%	0
Fine Lakes	0.00%	0
Floodwood	0.00%	0
Fredenberg	0.00%	0
French	2.72%	5
Gnesen	0.00%	0
Grand Lake	0.00%	0
Great Scott	2.17%	4
Greenwood	0.54%	1
Halden	0.00%	0
Industrial	0.00%	0
Kabetogama	0.00%	0
Kelsey	0.00%	0
Kugler	0.00%	0
Lakewood	0.54%	1
Lavell	0.00%	0
Leiding	0.54%	1

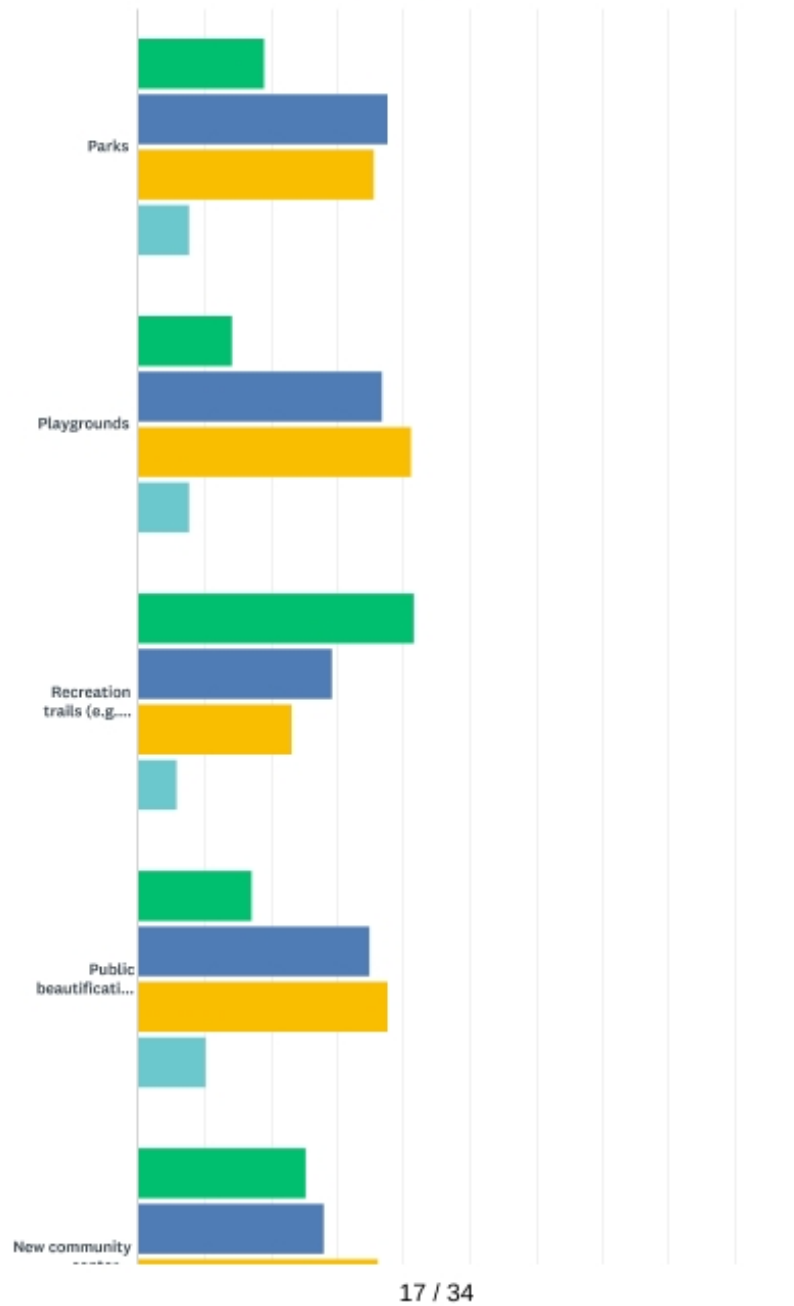
St. Louis County Consolidated Plan Survey

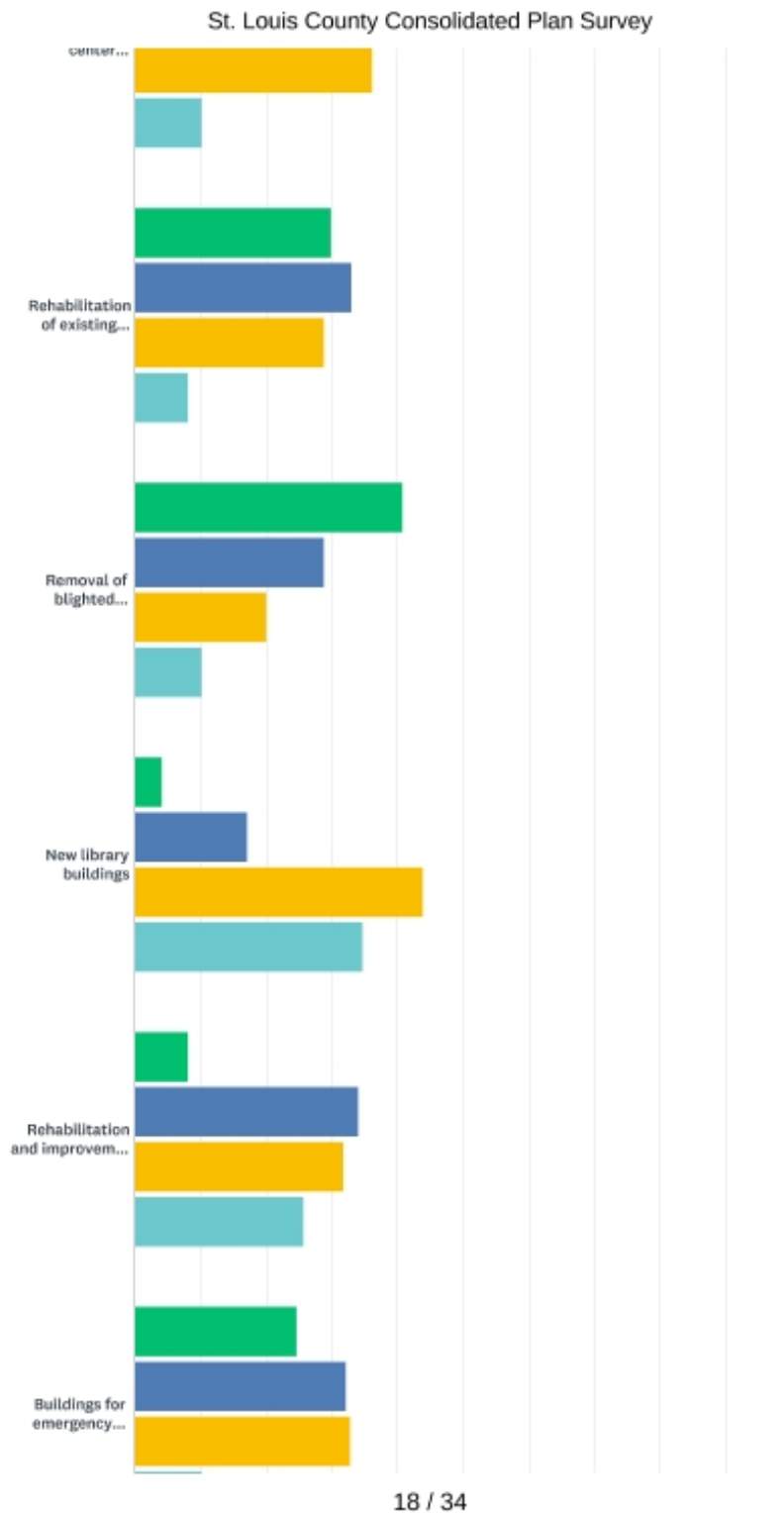
Linden Grove	0.00%	0
McDavitt	0.54%	1
Meadowlands	0.00%	0
Midway	3.26%	6
Morcom	2.17%	4
Morse	11.41%	21
Ness	0.00%	0
New Independence	0.54%	1
Normanna	0.54%	1
Northland	0.00%	0
North Star	0.00%	0
Owens	0.54%	1
Pequaywan	0.00%	0
Pike	1.09%	2
Portage	0.00%	0
Prairie Lake	0.00%	0
Sandy	0.54%	1
Solway	0.54%	1
Stoney Brook	0.00%	0
Sturgeon	0.00%	0
Toivola	0.54%	1
Van Buren	0.00%	0
Vermilion Lake	2.72%	5
Waasa	0.00%	0
White	2.17%	4
Willow Valley	1.09%	2
Wuori	2.72%	5
Unorganized Area	14.13%	26
TOTAL		184

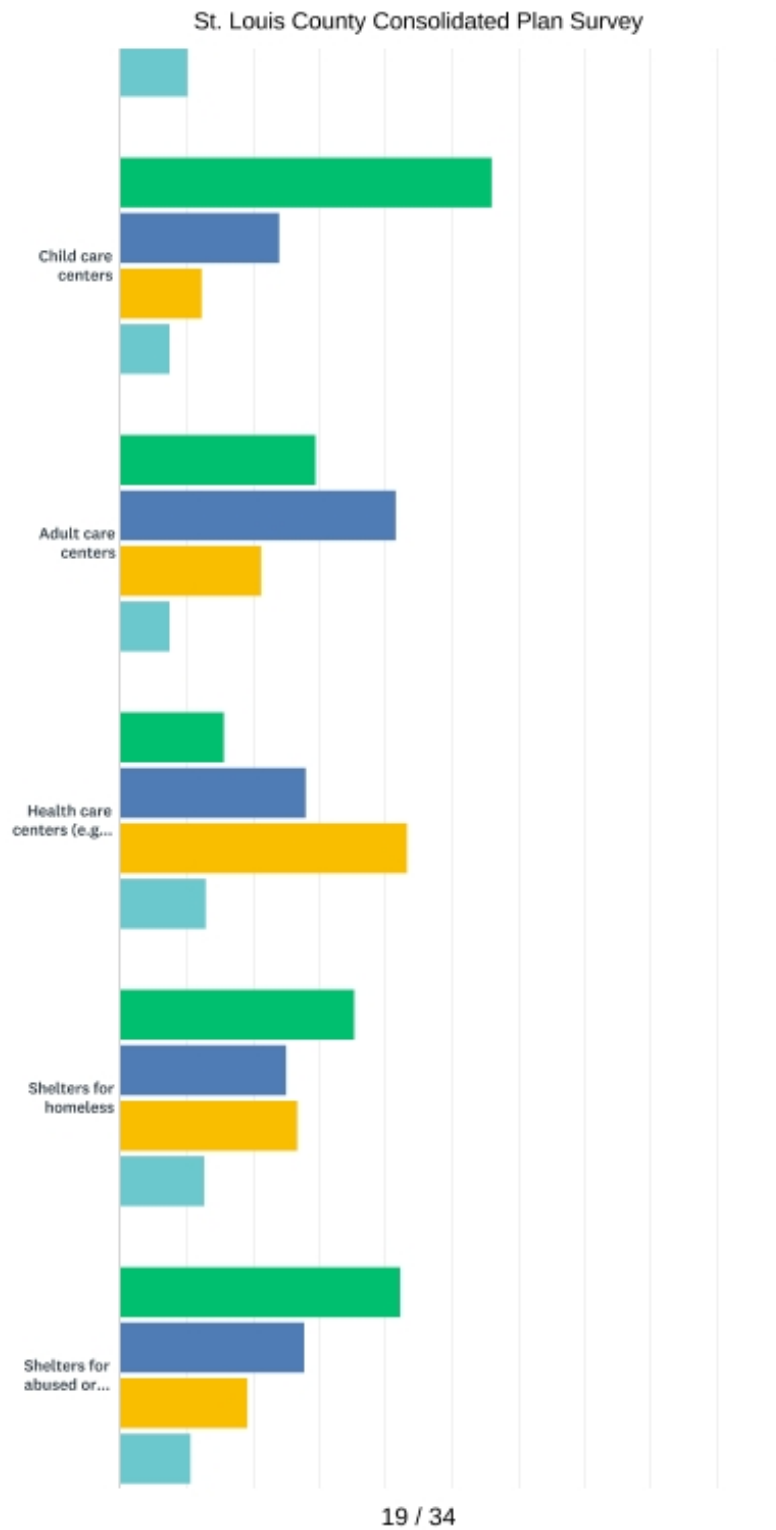
St. Louis County Consolidated Plan Survey

Q6 Related to community facilities and buildings, what are the needs in your community? (Services and programs are in the next question.)

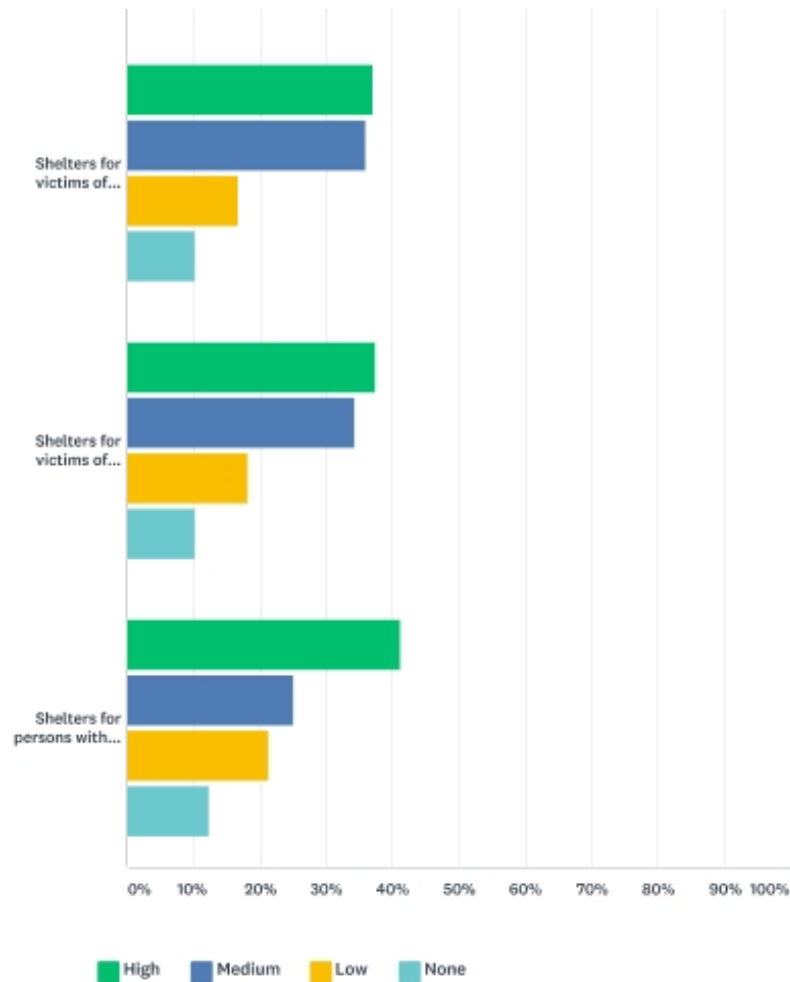
Answered: 189 Skipped: 55







St. Louis County Consolidated Plan Survey



	HIGH	MEDIUM	LOW	NONE	TOTAL	WEIGHTED AVERAGE
Parks	19.13% 35	37.70% 69	35.52% 65	7.65% 14	183	2.32
Playgrounds	14.29% 26	36.81% 67	41.21% 75	7.69% 14	182	2.42
Recreation trails (e.g. walking, bicycling, skiing, ATV)	41.62% 77	29.19% 54	23.24% 43	5.95% 11	185	1.94
Public beautification (e.g. trees, art, sculpture, fountains)	17.20% 32	34.95% 65	37.63% 70	10.22% 19	186	2.41
New community center buildings	25.41% 47	28.11% 52	36.22% 67	10.27% 19	185	2.31
Rehabilitation of existing community center buildings (e.g. accessibility, energy savings)	29.89% 55	33.15% 61	28.80% 53	8.15% 15	184	2.15

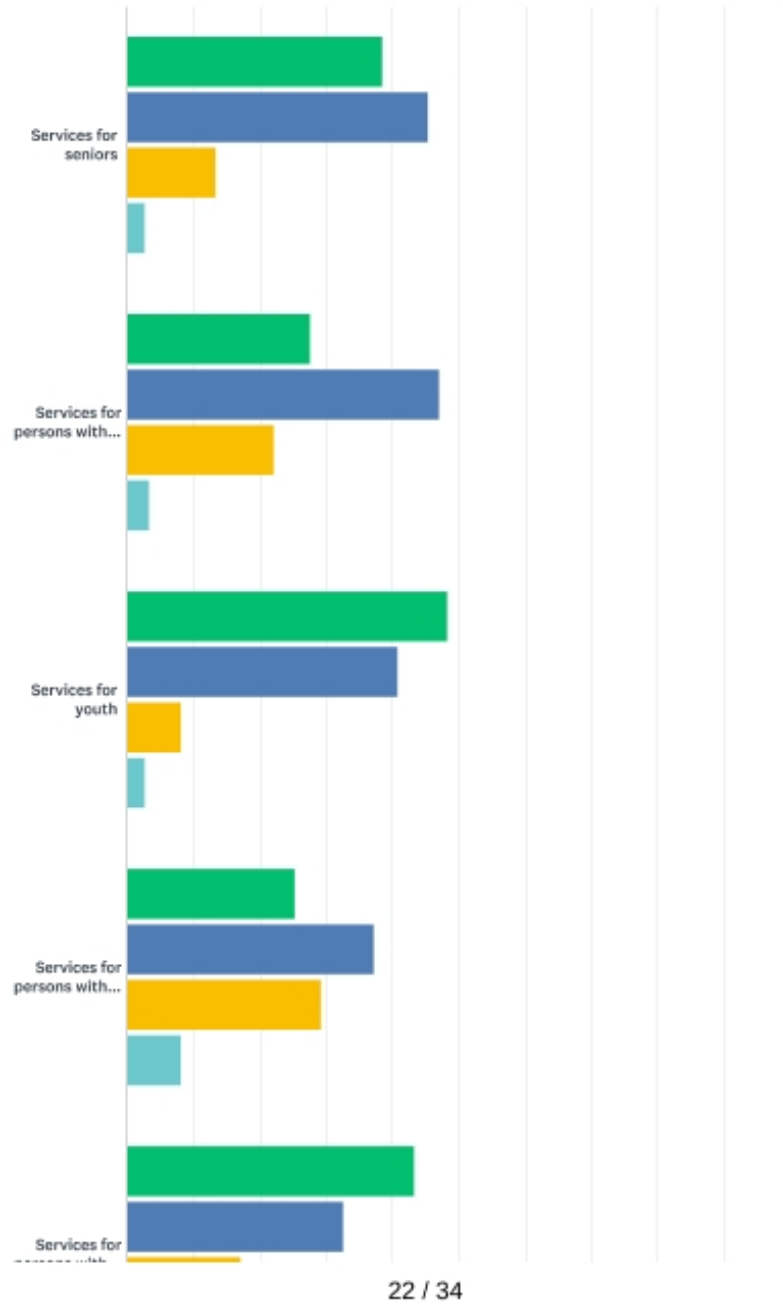
St. Louis County Consolidated Plan Survey

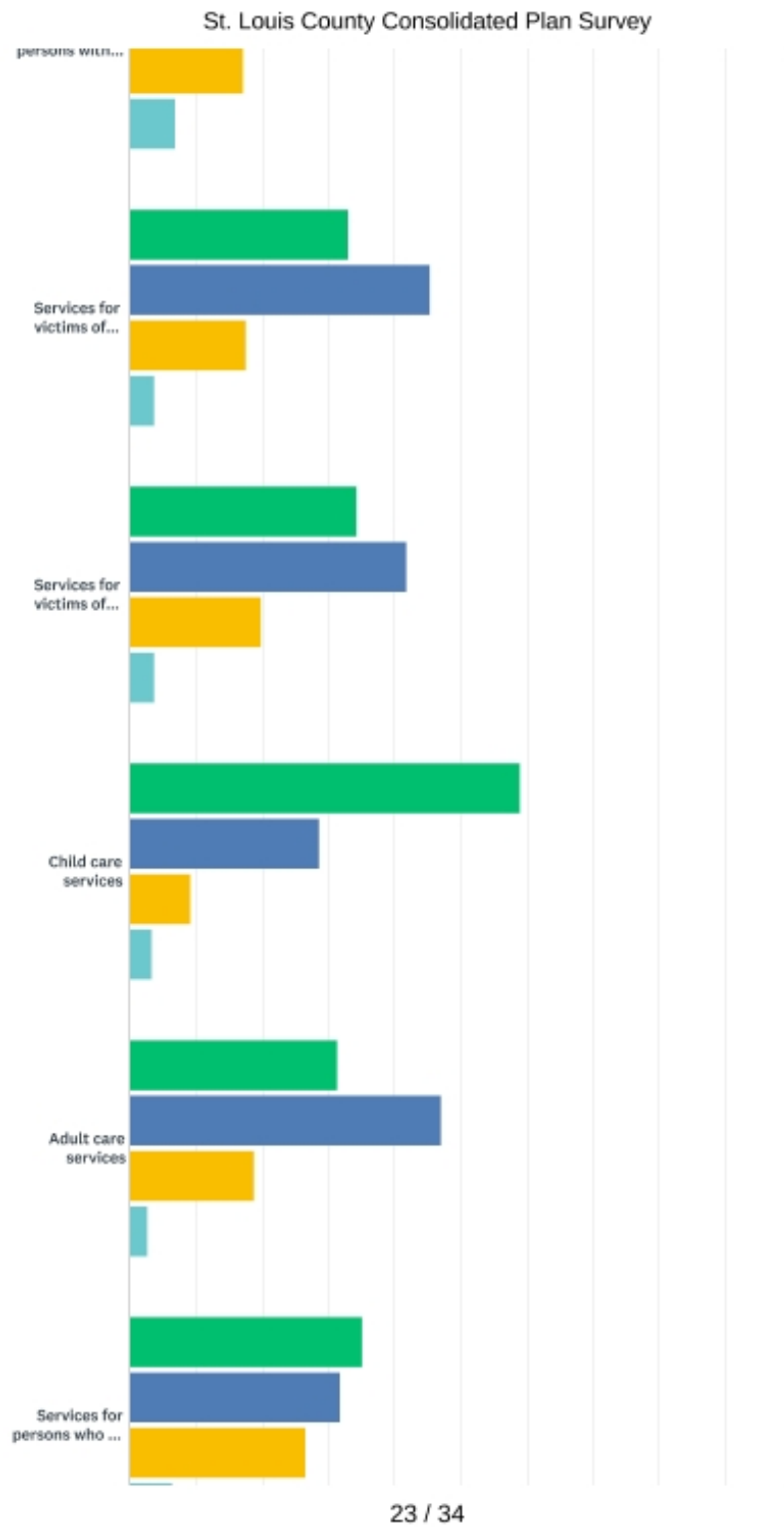
Removal of blighted commercial/industrial buildings	40.76% 75	28.80% 53	20.11% 37	10.33% 19	184	2.00
New library buildings	4.28% 8	17.11% 32	43.85% 82	34.76% 65	187	3.09
Rehabilitation and improvement of existing library buildings	8.24% 15	34.07% 62	31.87% 58	25.82% 47	182	2.75
Buildings for emergency services (e.g. fire, police, ambulance)	24.73% 46	32.26% 60	32.80% 61	10.22% 19	186	2.28
Child care centers	56.15% 105	24.06% 45	12.30% 23	7.49% 14	187	1.71
Adult care centers	29.41% 55	41.71% 78	21.39% 40	7.49% 14	187	2.07
Health care centers (e.g. clinics)	15.68% 29	28.11% 52	43.24% 80	12.97% 24	185	2.54
Shelters for homeless	35.29% 66	25.13% 47	26.74% 50	12.83% 24	187	2.17
Shelters for abused or neglected children	42.25% 79	27.81% 52	19.25% 36	10.70% 20	187	1.98
Shelters for victims of domestic violence	37.10% 69	36.02% 67	16.67% 31	10.22% 19	186	2.00
Shelters for victims of sexual violence	37.43% 70	34.22% 64	18.18% 34	10.16% 19	187	2.01
Shelters for persons with substance abuse	41.18% 77	25.13% 47	21.39% 40	12.30% 23	187	2.05

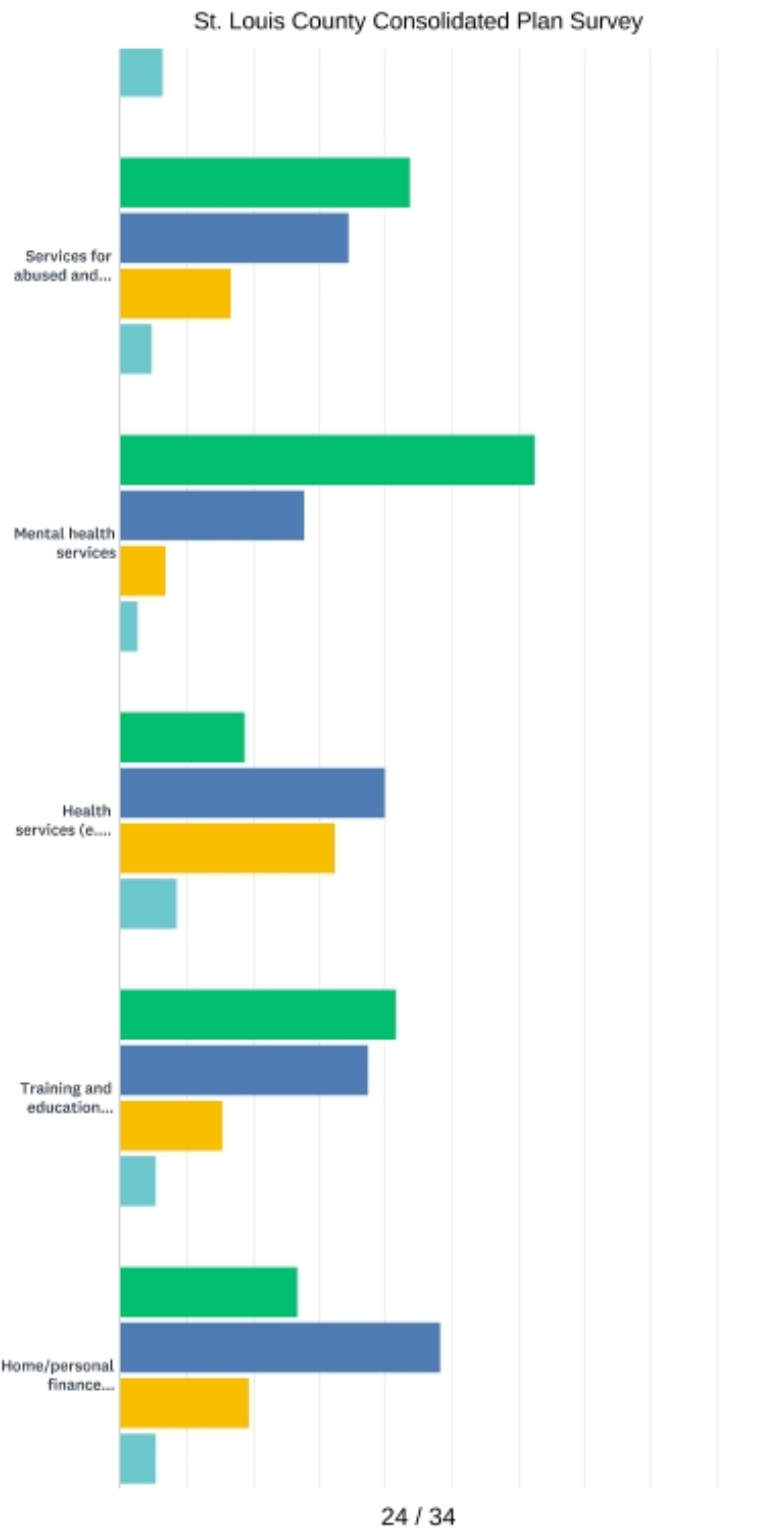
St. Louis County Consolidated Plan Survey

Q7 Related to community services and programs, what are the needs in your community?

Answered: 188 Skipped: 56







St. Louis County Consolidated Plan Survey



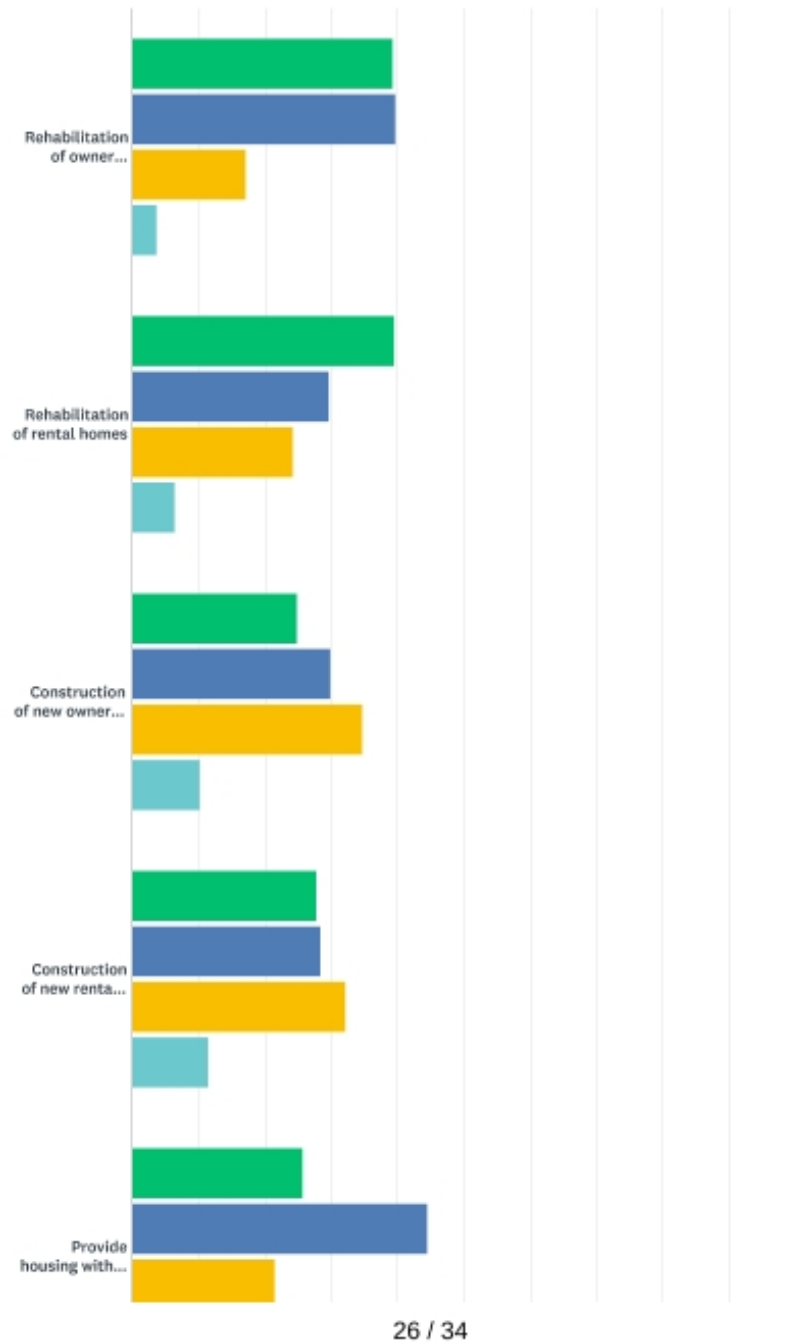
High Medium Low None

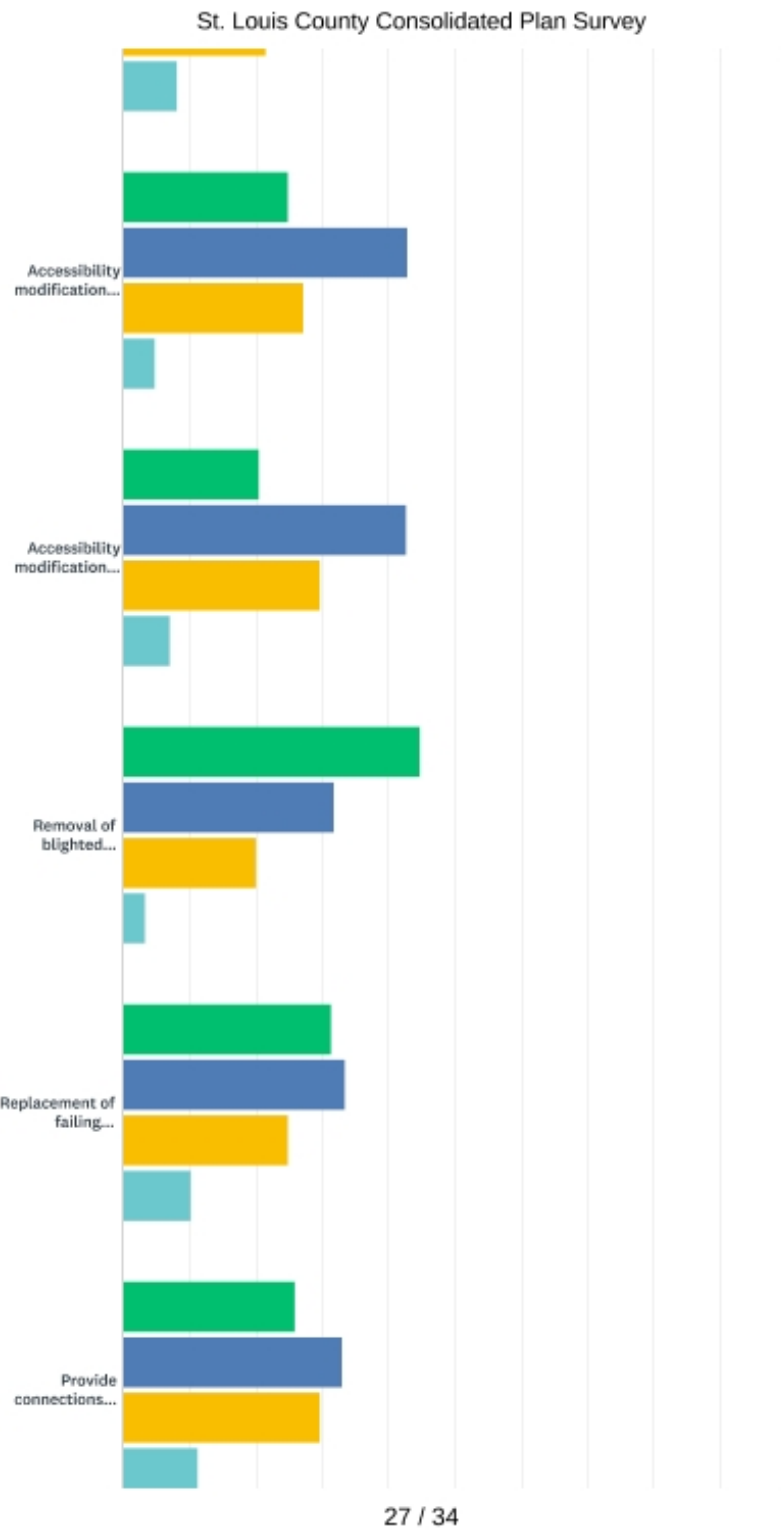
	HIGH	MEDIUM	LOW	NONE	TOTAL	WEIGHTED AVERAGE
Services for seniors	38.50% 72	45.45% 85	13.37% 25	2.67% 5	187	1.80
Services for persons with disabilities	27.57% 51	47.03% 87	22.16% 41	3.24% 6	185	2.01
Services for youth	48.39% 90	40.86% 76	8.06% 15	2.69% 5	186	1.65
Services for persons with legal issues (e.g. fair housing, landlord-tenant conflicts, etc)	25.41% 47	37.30% 69	29.19% 54	8.11% 15	185	2.20
Services for persons with substance and/or chemical abuse	43.32% 81	32.62% 61	17.11% 32	6.95% 13	187	1.88
Services for victims of domestic violence	33.16% 62	45.45% 85	17.65% 33	3.74% 7	187	1.92
Services for victims of sexual violence	34.41% 64	41.94% 78	19.89% 37	3.76% 7	186	1.93
Child care services	58.92% 109	28.65% 53	9.19% 17	3.24% 6	185	1.57
Adult care services	31.35% 58	47.03% 87	18.92% 35	2.70% 5	185	1.93
Services for persons who are homeless	35.14% 65	31.89% 59	26.49% 49	6.49% 12	185	2.04
Services for abused and neglected children	43.78% 81	34.59% 64	16.76% 31	4.86% 9	185	1.83
Mental health services	62.57% 117	27.81% 52	6.95% 13	2.67% 5	187	1.50
Health services (e.g. clinics)	18.92% 35	40.00% 74	32.43% 60	8.65% 16	185	2.31
Training and education leading to job skills for employment	41.71% 78	37.43% 70	15.51% 29	5.35% 10	187	1.84
Home/personal finance management training (e.g. home buying, budgets, etc.)	26.88% 50	48.39% 90	19.35% 36	5.38% 10	186	2.03

St. Louis County Consolidated Plan Survey

Q8 Related to housing, what are the needs in your community?

Answered: 187 Skipped: 57





St. Louis County Consolidated Plan Survey



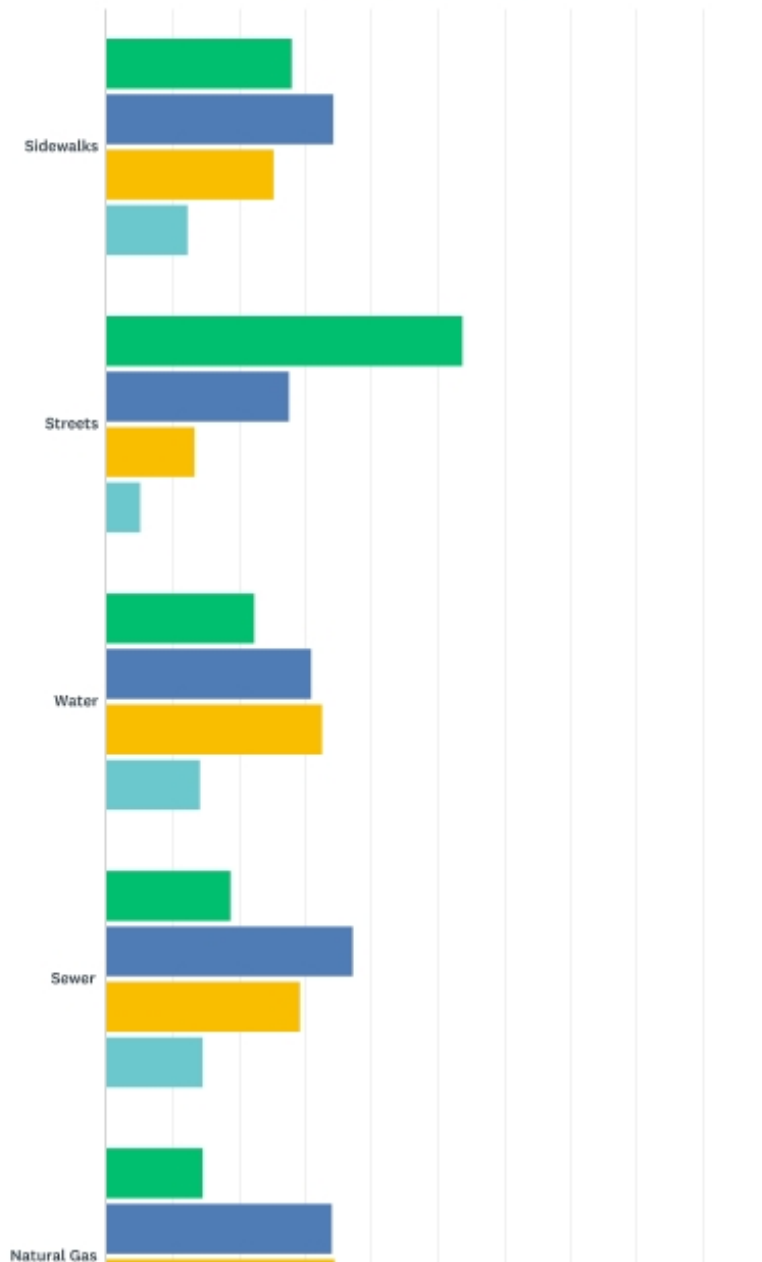
■ High
 ■ Medium
 ■ Low
 ■ None

	HIGH	MEDIUM	LOW	NONE	TOTAL	WEIGHTED AVERAGE
Rehabilitation of owner occupied homes	39.25% 73	39.78% 74	17.20% 32	3.76% 7	186	1.85
Rehabilitation of rental homes	39.46% 73	29.73% 55	24.32% 45	6.49% 12	185	1.98
Construction of new owner occupied homes	25.00% 46	29.89% 55	34.78% 64	10.33% 19	184	2.30
Construction of new rental homes	27.87% 51	28.42% 52	32.24% 59	11.48% 21	183	2.27
Provide housing with supportive services	25.81% 48	44.62% 83	21.51% 40	8.06% 15	186	2.12
Accessibility modifications to owner occupied homes	25.00% 46	42.93% 79	27.17% 50	4.89% 9	184	2.12
Accessibility modifications to rental homes	20.54% 38	42.70% 79	29.73% 55	7.03% 13	185	2.23
Removal of blighted housing	44.86% 83	31.89% 59	20.00% 37	3.24% 6	185	1.82
Replacement of failing individual septic systems	31.35% 58	33.51% 62	24.86% 46	10.27% 19	185	2.14
Provide connections from homes to municipal utility systems such as water, sewer, gas and electricity	25.95% 48	32.97% 61	29.73% 55	11.35% 21	185	2.26

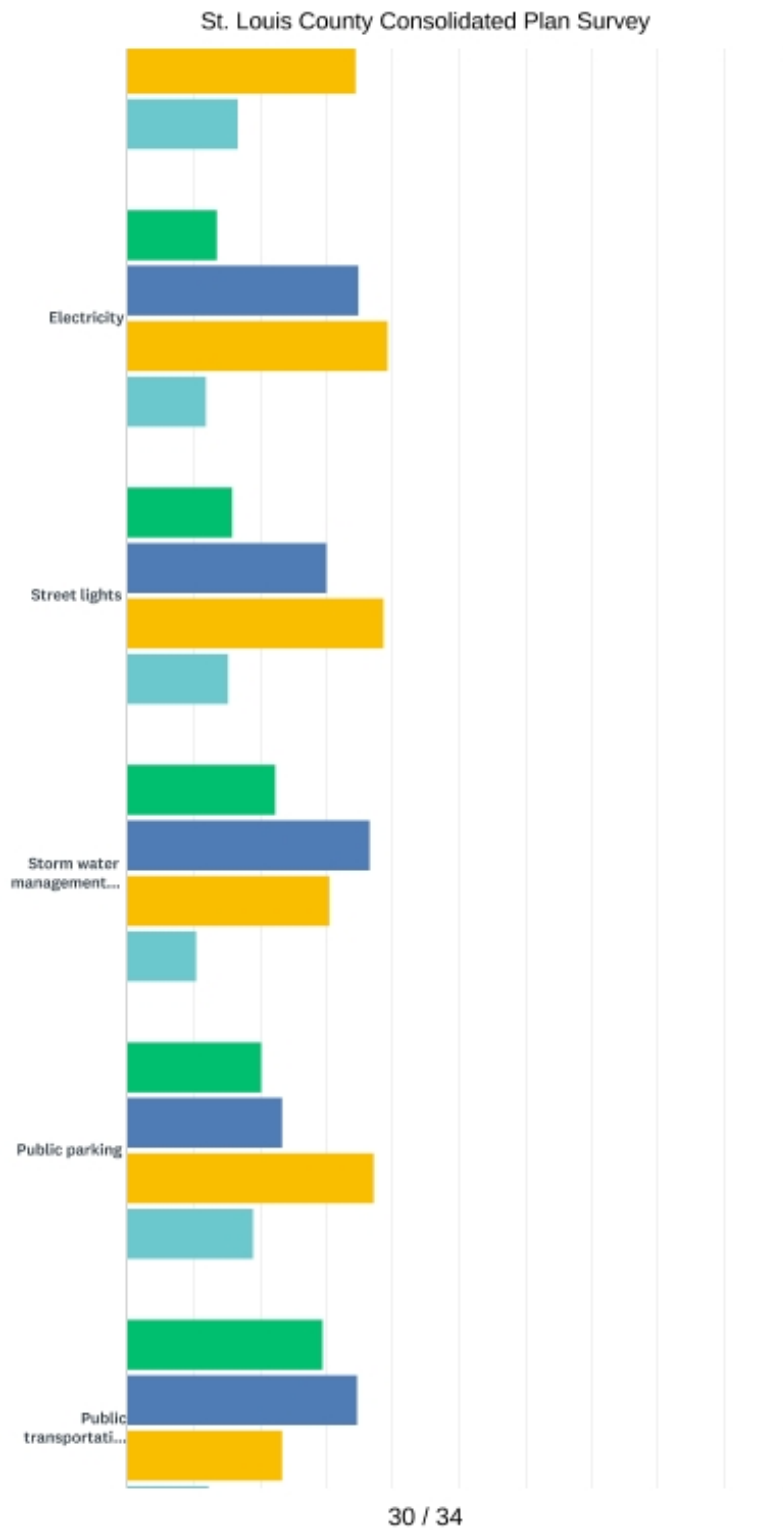
St. Louis County Consolidated Plan Survey

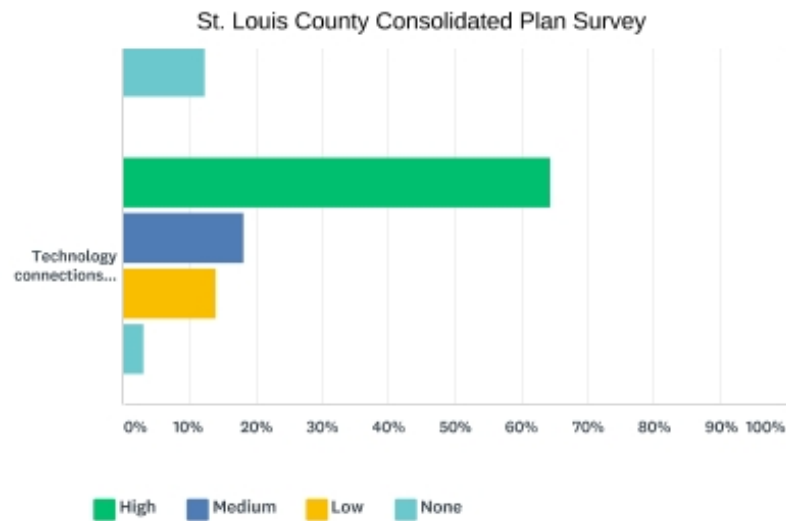
Q9 Related to public infrastructure, what are the needs in your community?

Answered: 188 Skipped: 56



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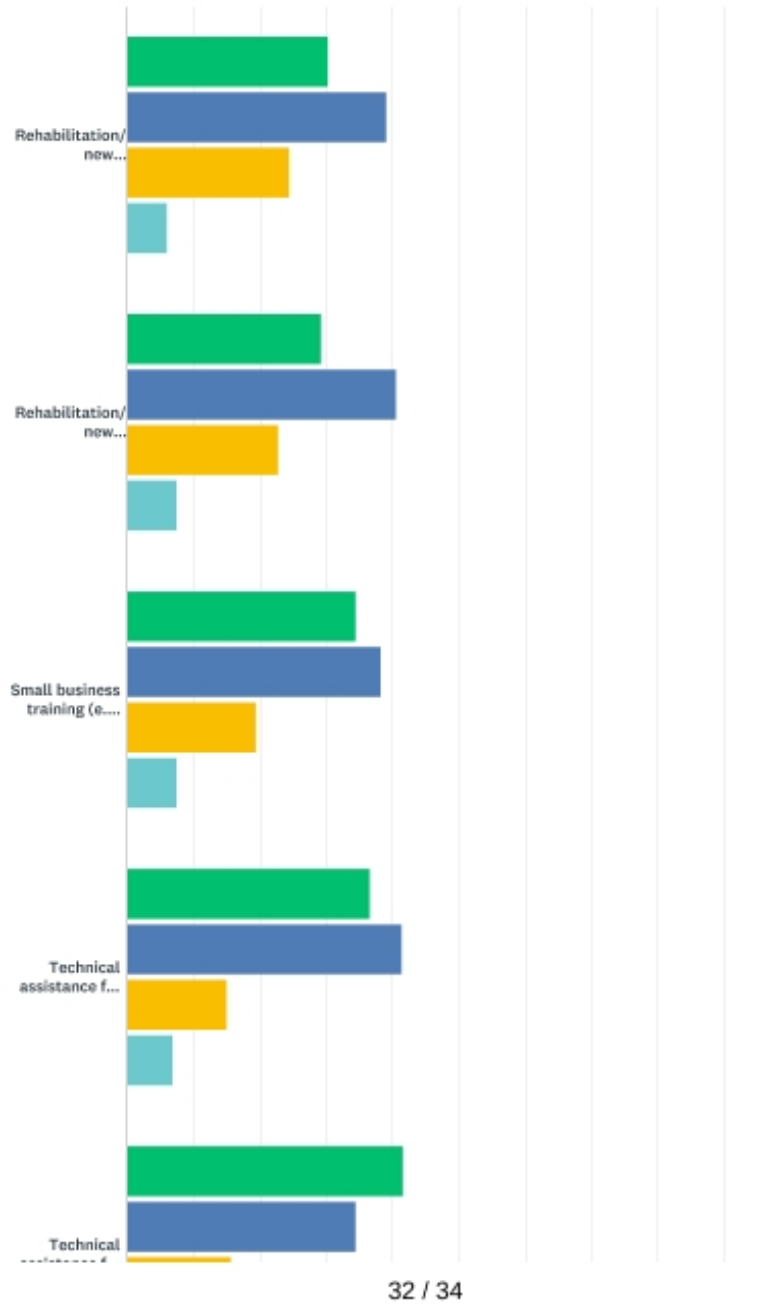


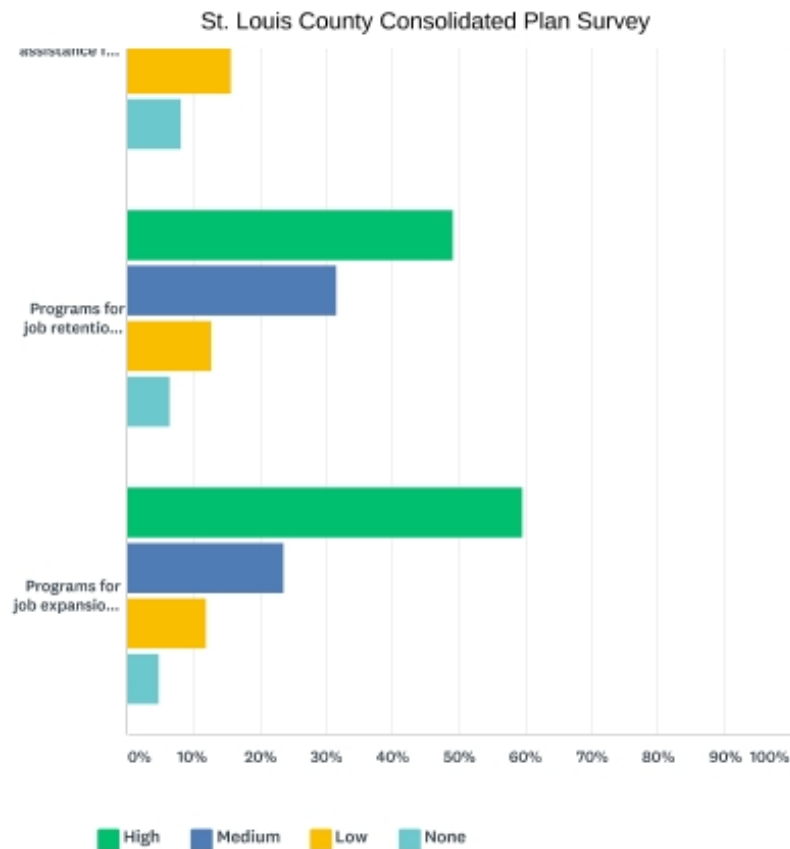


	HIGH	MEDIUM	LOW	NONE	TOTAL	WEIGHTED AVERAGE
Sidewalks	27.96% 52	34.41% 64	25.27% 47	12.37% 23	186	2.22
Streets	53.72% 101	27.66% 52	13.30% 25	5.32% 10	188	1.70
Water	22.28% 41	30.98% 57	32.61% 60	14.13% 26	184	2.39
Sewer	18.92% 35	37.30% 69	29.19% 54	14.59% 27	185	2.39
Natural Gas	14.59% 27	34.05% 63	34.59% 64	16.76% 31	185	2.54
Electricity	13.66% 25	34.97% 64	39.34% 72	12.02% 22	183	2.50
Street lights	15.85% 29	30.05% 55	38.80% 71	15.30% 28	183	2.54
Storm water management (e.g. ditches, curb and gutter, culverts)	22.40% 41	36.61% 67	30.60% 56	10.38% 19	183	2.29
Public parking	20.22% 37	23.50% 43	37.16% 68	19.13% 35	183	2.55
Public transportation (e.g.d bus, taxi, van)	29.41% 55	34.76% 65	23.53% 44	12.30% 23	187	2.19
Technology connections (e.g. high-speed internet, WIFI, cell phone service)	64.52% 120	18.28% 34	13.98% 26	3.23% 6	186	1.56

Q10 Related to economic development, what are the needs in your community?

Answered: 188 Skipped: 56





	HIGH	MEDIUM	LOW	NONE	TOTAL	WEIGHTED AVERAGE
Rehabilitation/new construction to existing businesses	30.43% 56	39.13% 72	24.46% 45	5.98% 11	184	2.06
Rehabilitation/new construction to new businesses	29.19% 54	40.54% 75	22.70% 42	7.57% 14	185	2.09
Small business training (e.g. business plans, marketing plans, human resource management)	34.59% 64	38.38% 71	19.46% 36	7.57% 14	185	2.00
Technical assistance for business expansion (e.g. use of technology, marketing, increasing production)	36.56% 68	41.40% 77	15.05% 28	6.99% 13	186	1.92
Technical assistance for new business startups (e.g. use of technology, marketing, increasing production)	41.62% 77	34.59% 64	15.68% 29	8.11% 15	185	1.90
Programs for job retention (e.g. keeping existing jobs in the community)	49.20% 92	31.55% 59	12.83% 24	6.42% 12	187	1.76
Programs for job expansion (e.g. increasing the number of jobs in the community, improving pay and/or benefits to employees)	59.68% 111	23.66% 44	11.83% 22	4.84% 9	186	1.62

St. Louis County Consolidated Plan Survey

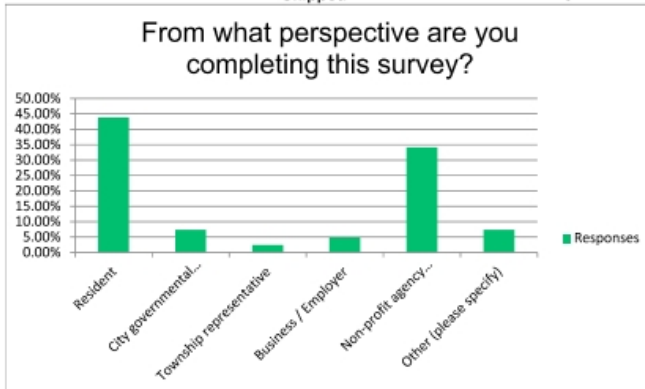
Q11 Additional Comments

Answered: 35 Skipped: 209

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Northeast Minnesota HOME Consortium Survey
From what perspective are you completing this survey?

Answer Choices	Responses	
Resident	43.90%	18
City governmental representative	7.32%	3
Township representative	2.44%	1
Business / Employer	4.88%	2
Non-profit agency representative	34.15%	14
Other (please specify)	7.32%	3
Answered		41
Skipped		0

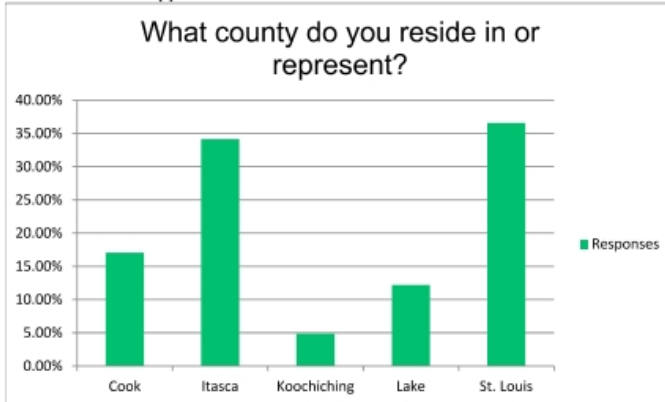


Respondents	Response Date	Other (please specify)	Tags
	1 Jan 21 2020	1 ARDC Area Agency on Aging	Resident of Lake County
	2 Sep 23 2019	1 Joint Powers of the county and the city	
	3 Sep 23 2019	1 County	

Northeast Minnesota HOME Consortium Survey

What county do you reside in or represent?

Answer Choices	Responses	
Cook	17.07%	7
Itasca	34.15%	14
Koochiching	4.88%	2
Lake	12.20%	5
St. Louis	36.59%	15
Answered		41
Skipped		0



Northeast Minnesota HOME Consortium Survey
 Related to housing, what are the needs in your community?

	High	Medium	Low	None	Total	Weighted Average
Rehabilitation of owner occupied homes	36.39%	12 39.39%	13 16.19%	6 6.08%	2 33	1.84
Rehabilitation of rental homes	36.39%	13 39.39%	11 21.21%	7 6.08%	2 33	1.84
Construction of new owner occupied homes	45.45%	15 39.39%	11 16.19%	6 6.08%	1 33	1.75
Construction of new rental homes	33.33%	11 39.39%	10 30.30%	10 6.08%	2 33	2.09
Provide housing with supportive services	60.61%	20 27.27%	9 6.08%	3 3.04%	1 33	1.55
Accessibility modifications to owner occupied homes	25.97%	8 40.75%	14 26.15%	9 3.12%	1 32	2.09
Accessibility modifications to rental homes	24.24%	8 36.36%	13 30.30%	10 6.08%	2 33	2.18
Removal of lead-based paint	37.37%	12 16.75%	8 40.62%	13 3.12%	1 32	2.09
Replacement of failing individual septic systems	31.39%	10 26.15%	8 34.38%	11 6.25%	2 32	2.18
Provide connections from homes to municipal utility systems such as	25.41%	8 26.02%	9 25.48%	11 6.68%	3 31	2.29
Physical assistance for home buyers	40.40%	10 40.40%	12 33.33%	1 3.03%	1 33	1.81
Child care centers	76.76%	24 16.15%	5 6.06%	2 0.06%	0 33	1.27
Adult care centers	23.13%	9 53.13%	17 16.75%	6 6.08%	0 32	1.81
Health care centers (e.g. clinic)	18.18%	6 18.60%	9 50.38%	10 6.25%	2 32	2.53
Shelters for homeless	29.02%	9 35.48%	11 26.03%	9 6.45%	2 31	2.13
Shelters for abused or neglected children	40.03%	13 28.12%	9 25.00%	8 5.25%	2 32	1.97
Shelters for victims of domestic violence	34.38%	11 40.62%	13 21.68%	7 3.12%	1 33	1.84
Shelters for victims of sexual violence	34.38%	11 40.62%	13 21.68%	7 3.12%	1 32	1.94
Shelters for persons with substance abuse	34.38%	11 34.38%	11 25.15%	9 3.12%	1 32	2
Other (please specify)					3	
Answered					33	
Skipped					8	



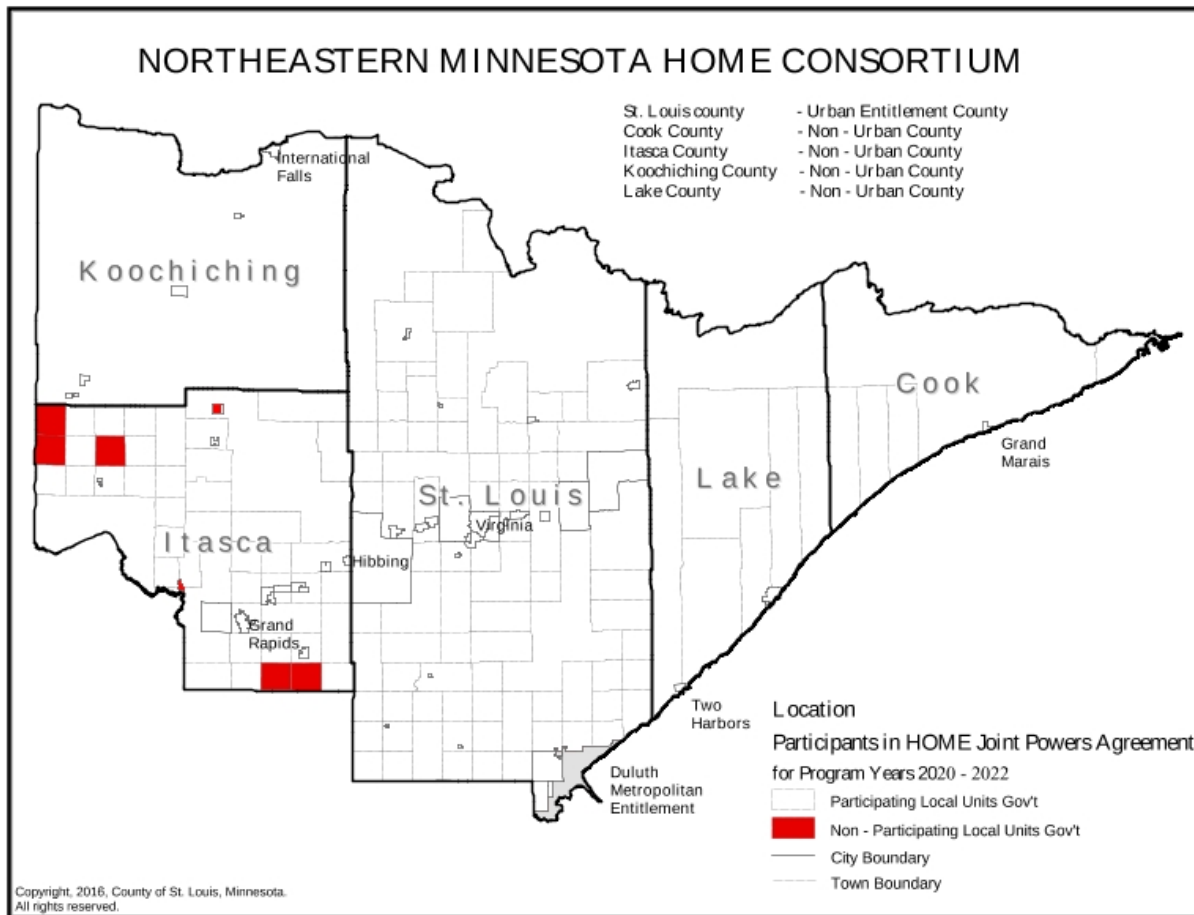
Respondents	Response Date - Other (please specify)	Tags
	Healthcare centers are needed and already under development. Highest need is for affordable/affordable housing for older adults and people with disabilities. Independent living and living with assistance.	
1 Jan 21 2020	1 assistance.	
2 Jan 20 2020	1 or families.	
	Eighteen left needs some sort of apartment style building. If you look at Boulder, CO where they have 4 greatly used apartment buildings, you will see what I mean. I think these would be greatly used and valuable for the	
3 Oct 01 2018	1 community!	

Northeast Minnesota HOME Consortium Survey

Additional comments

Answered 7
Skipped 34

Respondents	Response Date	Responses	Tags
1	Jan 22 2020 12:33 AM	We desperately need new housing ,apt complexes	
2	Jan 21 2020 03:20 PM	I'm mostly aware that it's difficult to find affordable and decent rental options in Two Harbors. This has resulted in people not accepting jobs, internships and residency here.	
3	Jan 21 2020 10:17 AM	Housing, transportation and employment are closely related. Lake County, and other portions of our region, needs more housing so we can recruit good employees for business and industry.	
4	Jan 20 2020 10:26 AM	There is a need in building affordable first time home buyer housing. Basic safe housing combined with the education. We can't keep placing people in low income housing and walking away. Low income housing should be a stepping stone, a place to learn and grow.	
5	Sep 24 2019 03:29 PM	I don't feel like we have the population to support shelters, but each of the populations listed needs supportive services, including housing support.	
6	Sep 24 2019 01:30 PM	Community needs to work towards assisting young families who want to live in the area. This should include employers committing to providing employment that will sustain a family	
7	Sep 23 2019 09:37 AM	It is difficult to prioritize need for the above as one could argue that all categories need attention immediately. Zero rental vacancy and inflated home pricing support the need for additional housing, supportive services, and financial assistance.	



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.

HUD Approved 12/5/2017

- iii. 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.

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Northeast Minnesota HOME Consortium Resale Guidelines

Introduction

The Northeast Minnesota HOME 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 County 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 and also signs a HOME Program written agreement, the CLT Homebuyer Agreement, held by St. Louis County. The CLT Homebuyer Agreement contains the following required provisions:

- Subsequent sale of the housing to another low-income homebuyer.
- Occupancy of the housing as the homebuyer's principal place of residence.
- Resale of the housing at a price that provides the homebuyer a fair return.
- Future affordability of the housing to a reasonable range of low-income buyers.

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. The fair return calculation includes the original investment and capital improvements of the CLT Homebuyer.

The County defines "affordable to a reasonable range of low-income homebuyers" as a family whose income is between 50 to 80 percent (50% - 80%) of area median income for the county where the home is located. Affordable ratios for housing cost and debt to income are 31 and 43 percent (31% and 43%) respectively. Housing cost includes principal, interest, property taxes, and insurance. Variance to this definition may be allowed when the first mortgage lender allows higher ratios and provides St. Louis County with documentation for its funding approval.

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Resale Requirements

1. One Roof must sign a Declaration of Covenants and Restrictions to impose the Northeast Minnesota HOME Consortium 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 and such sale occurs within the required period of affordability, the CLT Homebuyer agrees to the following provisions:
 - a. Subsequent sale of the housing to another low-income family as defined by the HOME Program regulations who will occupy the housing as their principal residence.
 - b. Subsequent sale of the housing at a price that provides the CLT Homebuyer a fair return. The fair return calculation includes the original investment and capital improvements of the CLT Homebuyer.
 - c. Subsequent sale of the housing at a price affordable to a reasonable range of low-income homebuyers as defined by the Northeast Minnesota HOME Consortium Resale Guidelines.
3. Upon the CLT Homebuyer's completion of the required affordability period in compliance with the HOME Program regulations, the Subsidy will be forgiven, the

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Declaration of Covenants and Restrictions will be satisfied, and the affordability requirements of the CLT Homebuyer Agreement and the federal HOME regulations at 24 CFR 92 will have been met. The affordability period is calculated from the date the CLT Homebuyer Agreement is signed.

4. If the CLT Homebuyer ceases to occupy the housing as the CLT Homebuyer's principal residence and homestead for the required affordability period, the full amount of the Subsidy will be due and payable.
5. HOME Program affordability restrictions may terminate upon foreclosure, transfer in lieu of foreclosure, and assignment of FHA mortgage, in order to clear title.

The attached Resale Worksheet provides an example of the resale calculation listed in item 1. c. above.

Noncompliance Requirements

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

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 homebuyer in purchasing the housing.

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

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Resale Price Calculation and Reasonable Return to the Homebuyer

The resale price will be equal to 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.

Homebuyer's Base Price: 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.

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

Increase in Market Value: 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, minus the Initial Appraised Value.

Homebuyer's share of Increase in Market Value: 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.

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

Summary of Formula Price: 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

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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
<ul style="list-style-type: none"> 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
<ul style="list-style-type: none"> 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
<ul style="list-style-type: none"> 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. Per 24 CFR 576.401: 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 at-risk 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:
 1. 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:
 - 1. 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:

1. 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. Structure and Materials. 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. Access. The shelter must be accessible, and there should be a second means of exiting the facility in the case of emergency or fire.
4. Space and Security. Each resident should have adequate space and security for themselves and their belongings. Each resident must have an acceptable place to sleep.
5. Interior Air Quality. 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. Water Supply. The shelter's water supply should be free of contamination.
7. Sanitary Facilities. 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. Thermal Environment. The shelter/facility must have any necessary heating/cooling facilities in proper operating condition.
9. Illumination and Electricity. 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. Food Preparation. Food preparation areas, if any, should contain suitable space and equipment to store, prepare and serve food in a safe and sanitary manner.
11. Sanitary Conditions. The shelter should be maintained in a sanitary condition.
12. Fire Safety-Sleeping Areas. 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. Fire Safety-Common Areas. 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 provide that, during the term of the agreement, the owner 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. Medium-term 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 re-housing 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

Guidelines:

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.
3. 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.

Appendix - Alternate/Local Data Sources

1	Data Source Name 2019 Point in Time (PIT) Data
	List the name of the organization or individual who originated the data set. 2019 State of Minnesota Office of Economic Opportunity (OEO) Point in Time County
	Provide a brief summary of the data set. Point in time count of persons experiencing homelessness.
	What was the purpose for developing this data set? Continuum of Care planning and reporting
	How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population? The data covers the St. Louis County Consolidated Plan area.
	What time period (provide the year, and optionally month, or month and day) is covered by this data set? 2019 Point in Time Count Data
	What is the status of the data set (complete, in progress, or planned)? Complete