



**NOTICE OF SPECIAL BOARD MEETING  
VIA CONFERENCE CALL \***

**Date:** Thursday August 11, 2022

**Time:** 11:00 a.m.

**Location:** Minnesota Housing  
400 Wabasha Street N, Suite 400  
St Paul, MN 551020

**Conference call:**

**Dial-in Number:** 1-866-705-2554

**Conference Code:** 244042

**AGENDA**

1. Call to Order
2. Approval, Amendments to the:
  - 2017-2021 Consolidated Plan for Housing and Community Development
  - 2020 Annual Action Plan for Housing and Community Development
  - 2021 Annual Action Plan for Housing and Community Development
3. Approval, Consolidated Plan for Housing and Community Development 2022-2026 and 2022 Annual Action Plan
4. Approval, HomeHelpMN COVID-19 Homeownership Assistance Fund Program Changes
5. Adjournment

**NOTE:** The information and requests for approval contained in this packet of materials are being presented by Minnesota Housing staff to the Minnesota Housing Board of Directors for its consideration on Thursday August 11, 2022.

**Items requiring approval are neither effective nor final until voted on and approved by the Minnesota Housing Board.**

*The Agency may conduct a meeting by telephone or other electronic means, provided the conditions of Minn. Stat. §462A.041 are met. In accordance with Minn. Stat. §462A.041, the Agency shall, to the extent practical, allow a person to monitor the meeting electronically and may require the person making a connection to pay for documented marginal costs that the Agency incurs as a result of the additional connection.*

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**Item:** Approval, Amendments to the:

- 2017-2021 Consolidated Plan for Housing and Community Development
- 2020 Annual Action Plan for Housing and Community Development
- 2021 Annual Action Plan for Housing and Community Development

**Staff Contact(s):**

Ryan Baumtrog, 651.296.9820, ryan.baumtrog@state.mn.us

James Lehnhoff, 651.296.3028, james.lehnhoff@state.mn.us

**Request Type:**

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> Approval | <input type="checkbox"/> No Action Needed |
| <input checked="" type="checkbox"/> Motion   | <input type="checkbox"/> Discussion       |
| <input type="checkbox"/> Resolution          | <input type="checkbox"/> Information      |

**Summary of Request:**

Staff seeks approval to amend the 2017-2021 Consolidated Plan for Housing and Community Development; the 2020 Annual Action Plan for Housing and Community Development; and the 2021 Annual Action Plan for Housing and Community Development. The amendment for all three documents incorporates consistent language that recognizes special needs populations as a priority population in the state, which allows for a preference for permanent supportive housing for High Priority Homeless and for people with disabilities. The amendment also allows a preference for households with rental subsidies or rental guarantees.

**Fiscal Impact:**

None.

**Meeting Agency Priorities:**

- Improve the Housing System
- Preserve and Create Housing Opportunities
- Make Homeownership More Accessible
- Support People Needing Services
- Strengthen Communities

**Attachment(s):**

- Background

## Background

In accordance with United States Department of Housing and Urban Development (HUD) requirements, as recipients of federal funds, Minnesota Housing, the Department of Employment and Economic Development and the Department of Human Services must develop a five-year Consolidated Plan for Housing and Community Development. The Consolidated Plan identifies the needs and respective resource investments to help meet the state's needs related to housing, homeless and non-homeless populations, community development, and economic development. It also lays out the State's plan for use of the federal funds through the respective programs. The Consolidated Plan is implemented through the Annual Action Plan that further identifies activities and resources to address the needs and goals identified in the Consolidated Plan. For Minnesota Housing, this specifically includes the federally funded HOME, National Housing Trust Fund (NHTF), and Housing Opportunities for Persons with AIDS (HOPWA) programs. Minnesota's last Consolidated Plan period ran from 2017 to 2021.

In conjunction with the proposed 2022-2026 Consolidated Plan that the board is reviewing under separate action, staff proposes to amend three existing documents from the previous Consolidated Plan period to provide for consistent language between the two Consolidated Plan periods; consistency with priorities established in the current Minnesota Housing Strategic Plan and Qualified Allocation Plan; and, for compatibility with the identified preferences that are included in previously selected multifamily development projects.

The below language would be incorporated into the following three documents, which are available in full form on the [Minnesota Housing website](#):

- 2017-2021 Consolidated Plan for Housing and Community Development (Table 45, Priority 2 on page 105)
- 2020 Annual Action Plan for Housing and Community Development (Section 5 on page 3)
- 2021 Annual Action Plan for Housing and Community Development (Section 7 on page 4)

The language to be incorporated into the respective documents is as follows<sup>1</sup>:

*In addition to the income priority, Minnesota Housing also considers special needs populations as a priority in the state, and will allow, when appropriate, a limitation or preference to those populations. Two special needs populations allowed with regards to HOME and National Housing Trust Fund funding are permanent supportive housing for "High Priority Homeless" and people with disabilities. High Priority Homeless means (i) households experiencing long-term homelessness; (ii) households at significant risk of experiencing long-term homelessness; or (iii) households priorities for permanent supportive housing by the Coordinated Entry System adopted by the local continuums of*

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<sup>1</sup> The 2021 Annual Action Plan will only add the second and third paragraphs because the first paragraph was already substantially included in that document.

*care. For persons with disabilities, the limitation or preference will be limited to the population of families (including individuals) that significantly interfere with their ability to obtain and maintain housing.*

*In addition, Minnesota Housing recognizes the need to leverage funds from other sources to make rental units available to the lowest income applicants. Accordingly, the state will allow a preference for applicants with rental subsidies or rental guarantees.*

*In accordance with regulatory requirements of HOME and the National Housing Trust Fund, any limitation or preference will not violate nondiscrimination requirements.*

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**Item:** Approval, Consolidated Plan for Housing and Community Development 2022-2026 and 2022 Annual Action Plan.

**Staff Contact(s):**

Ryan Baumtrog, 651-296-9820, ryan.baumtrog@state.mn.us

Lael Robertson, 651-296-9426, lael.roberston@state.mn.us

**Request Type:**

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> Approval | <input type="checkbox"/> No Action Needed |
| <input checked="" type="checkbox"/> Motion   | <input type="checkbox"/> Discussion       |
| <input type="checkbox"/> Resolution          | <input type="checkbox"/> Information      |

**Summary of Request:**

Approve Consolidated Plan for Housing and Community Development 2022-2026 and 2022 Annual Action Plan for submission to the U.S. Department of Housing and Urban Development by August 16.

**Fiscal Impact:**

The Annual Action Plan has fiscal impact and describes to the Department of Housing and Urban Development how the State will use its HOME Investment Partnerships, National Housing Trust Fund, and Housing Opportunities for Persons with AIDS funds in program year 2022. Amounts allocated by HUD to Minnesota Housing for these programs for 2022 are \$9,442,511, \$10,497,206, and \$386,643, respectively.

**Meeting Agency Priorities:**

- Improve the Housing System
- Preserve and Create Housing Opportunities
- Make Homeownership More Accessible
- Support People Needing Services
- Strengthen Communities

**Attachment(s):**

- Background
- Relevant pages of the plans

## **Background**

To be eligible to receive HOME Investment Partnerships (HOME), National Housing Trust Fund and Housing Opportunities for Persons with AIDS (HOPWA), Community Development Block Grant (CDBG), and Emergency Solutions Grant (ESG) program funds, the State must have a five year 'Consolidated Plan' and an 'Annual Action Plan.' The Department of Employment and Economic Development (DEED) is the lead agency for preparing the plans, but DEED, Minnesota Housing, and the Department of Human Services (the consolidated plan agencies) work collaboratively to prepare them.

The Consolidated Plan, developed this year for program years 2022-2026, describes the state's economic and demographic profile, the housing market, a needs assessment for housing and homelessness, community development needs, and goals and objectives for housing, community development, and housing and services for special needs populations.

The annual plan describes to the public and HUD the activities that will be undertaken with the federal funds for the program year beginning October 1, 2022, to address the goals and objectives of the Consolidated Plan. Once submitted, HUD has 45 days to review and comment, approve, or reject the Annual Action Plan.

Both the Consolidated and Annual Action Plans were developed after soliciting and considering public comment through four focus groups, many interviews with funding stakeholders, and an on-line survey that was widely publicized to the public and stakeholders.

The draft plan was open for public comment July 1 – July 31, 2022, and the final plan must be submitted to HUD prior to August 16, 2022, under a statutory deadline.

The State received comments from the following groups: Metropolitan Interfaith Council on Affordable Housing (MICAH), Suburban Hennepin Housing Coalition, East Metro Civic Alliance and Housing Justice Center. Pertinent pages from the final plan, including their comments and responses are found in the subsequent select pages of the packet.

Minnesota Housing takes the lead on evaluating performance under the Annual Action Plan through the annual Consolidated Annual Performance and Evaluation Report (CAPER).

STATE OF  
MINNESOTA

2022-2026  
Five-Year  
Consolidated  
Plan and  
2022 Annual  
Action Plan

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# Executive Summary

## ES-05 Executive Summary - 91.300(c), 91.320(b)

### 1. Introduction

Since 1995, the U.S. Department of Housing and Urban Development (HUD) has required consolidating the planning, application, reporting, and citizen participation processes for the formula grant programs: Community Development Block Grants (CDBG), Home Investment Partnerships (HOME), National Housing Trust Fund (NHTF), Emergency Solutions Grants (ESG), and Housing Opportunities for Persons with AIDS (HOPWA). The single-planning process, termed the Consolidated Plan for Housing and Community Development, is intended to fulfill three basic goals more comprehensively: to offer decent housing, to provide a suitable living environment, and to expand economic opportunities.

According to HUD, the Consolidated Plan is designed to be a collaborative process whereby a community establishes a unified vision for housing and community development actions. It offers entitlement communities the opportunity to shape these housing and community development programs into effective, coordinated housing and community development strategies. It also allows for strategic planning and citizen participation to occur in a comprehensive context, thereby reducing duplication of effort.

As the lead agency for the Consolidated Plan for the State of Minnesota, the Minnesota Department of Employment and Economic Development (DEED), in coordination with the Minnesota Housing Finance Agency (Minnesota Housing), and the Department of Human Services (DHS), hereby follows HUD's guidelines for citizen and community involvement. Furthermore, these agencies are responsible for overseeing these citizen participation requirements, those that accompany the Consolidated Plan and the CDBG, HOME, HOPWA, NHTF, and ESG programs, as well as those that complement the DEED planning processes already at work in the state.

### **PURPOSE OF THE CONSOLIDATED PLAN**

The Minnesota Consolidated Plan for Housing and Community Development for 2022 to 2026 is the comprehensive five-year planning document identifying the needs and respective resource investments in satisfying the state's housing, homeless and non-homeless special needs population, community development, and economic development needs.

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

#### Overview

The strategies of the programs administered by the DEED, Minnesota Housing, and DHS are to provide decent housing, a suitable living environment, and expanded economic opportunities for the state's low- and moderate-income residents. The agencies strive to accomplish these strategies by maximizing and effectively utilizing all available funding resources to conduct housing and community development activities that will serve economically disadvantaged residents of the state. By addressing needs and creating opportunities at the individual and local government levels, the agencies hope to improve the quality of life for all residents of the state. These strategies are further explained as follows:

- *Providing decent housing* requires helping homeless persons obtain appropriate housing and assisting those at risk of homelessness, preserving the affordable housing stock, increasing availability of permanent housing that is affordable to low- and moderate-income persons without discrimination, and increasing the supply of supportive housing.

- *Providing a suitable living environment* entails improving the safety and livability of neighborhoods, increasing access to quality facilities and services, and reducing the isolation of income groups within an area through integration of low-income housing opportunities.

- *Expanding economic opportunities* involves creating jobs that are accessible to low and moderate-income persons, making mortgage financing available for low- and moderate-income persons at reasonable rates, providing access to credit for development activities that promote long-term economic and social viability of the community, and empowering low-income persons.

These strategies will be purposed through the Goals as outlined in the Strategic Plan section of this Plan.

### **3. Evaluation of past performance**

The State's evaluation of its past performance has been completed in a thorough Consolidated Annual Performance and Evaluation Report (CAPER). The past year CAPERs can be found [here](#):

[https://mn.gov/deed/assets/caper-2020\\_tcm1045-456904.pdf](https://mn.gov/deed/assets/caper-2020_tcm1045-456904.pdf)

and [here](#):

[https://mn.gov/deed/assets/caper-2020\\_tcm1045-456904.pdf](https://mn.gov/deed/assets/caper-2020_tcm1045-456904.pdf)

### **4. Summary of citizen participation process and consultation process**

As part of the consolidated planning process, the lead agency must consult with a wide variety of organizations to gain understanding of the housing and community development needs of the State. This Consolidated Plan represents a collective effort from a broad array of entities in Minnesota including private, non-profit and public organizations, non-entitled communities, county governments,

Continuum of Care organizations, and various other state agencies. The public participation process included focus groups, outreach committees, public input sessions, and a Housing and Community Development Needs Surveys.

## **5. Summary of public comments**

Public comment narratives are attached as an appendix in Citizens Participation Comments.

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

Public comment narratives are attached as an appendix in Citizens Participation Comments. The State did not reject any comments.

## **7. Summary**

The 2022-2026 Consolidated Plan has the following goals for the 5-year planning period. These goals will use HOME, ESG, HOPWA, NHTF and CDBG funds.

- Address Housing Rehabilitation Needs - DEED

*Fund housing rehabilitation activities for low to moderate income homeowner and rental households through CDBG funds*

- Increase Affordable Housing Opportunities - Minnesota Housing

*Fund housing activities for low-to-moderate income rental households, including renovation and new construction*

- Support Economic Development and Workforce Needs - DEED

*Encourage robust economic growth through commercial rehabilitation activities, the development and retention of businesses and jobs throughout non-entitlement areas of the State*

- Facilitate Housing and Services for the Homeless - DHS

*Provide funds for service providers to meet the various housing and service needs of the homeless population in Minnesota*

- Provide Funds for Special-Needs Housing and Services – Minnesota Housing

*Continue to fund programs that provide housing and services to special needs populations, including those with HIV/AIDS*

- Improve Public Facilities and Infrastructure— DEED

*Address community needs through improvements to public facilities and infrastructure*

## The Process

### PR-05 Lead & Responsible Agencies 24 CFR 91.300(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                                 |
|-----------------------|-----------|---|
| Lead Agency           | MINNESOTA | Department of Employment and Economic Development |
| CDBG Administrator    | MINNESOTA | Department of Employment and Economic Development |
| HOPWA Administrator   | MINNESOTA | Minnesota Housing Finance Agency                  |
| HOME Administrator    | MINNESOTA | Minnesota Housing Finance Agency                  |
| ESG Administrator     | MINNESOTA | Department of Human Services                      |
| HOPWA-C Administrator |           |   |
| NHTF Administrator    | MINNESOTA | Minnesota Housing Finance Agency                  |

**Table 1 – Responsible Agencies**

### Narrative

#### Consolidated Plan Public Contact Information

**Natasha Kukowski, Small Cities Development Unit Manager**

Department of Employment and Economic Development  
1st National Bank Building, 332 Minnesota St., Suite E200  
St. Paul MN 55101  
Direct: 651-259-7425  
Email: [Natasha.Kukowski@state.mn.us](mailto:Natasha.Kukowski@state.mn.us)

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

### **1. Introduction**

As part of the consolidated planning process, the lead agency, DEED, and sister administering agencies, Minnesota Housing and DHS, must consult with a wide variety of organizations in order to gain understanding of housing and community development needs.

#### **Provide a concise summary of the state’s activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I))**

This represents a collective effort from a broad array of entities in Minnesota, ranging from advocacy groups for people with disabilities to economic development organizations. Private, nonprofit, and public organizations, including local government, persons interested in the CDBG program, persons interested in the HOME or National Housing Trust Fund programs, persons associated with Continuum of Care organizations, and the Minnesota Department of Health were contacted through email correspondence, direct interviews, and online group interactions. These persons were solicited to discuss housing and community development needs in Minnesota, including the ranking of those needs and activities that DEED, Minnesota Housing, and DHS might consider to better address needs throughout the state. Further, individuals were asked to provide additional insight into prospective barriers and constraints regarding housing and community development needs in Minnesota.

#### **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 DHS hosts a monthly meeting of all Continuum of Care Coordinators. Also in attendance are staff from various state administered homelessness programs as well as HUD CPD staff. Issues such as accessing HUD Super NOFA funding, the allocation of program resources, development of common assessment tools, performance measurement and HMIS are discussed at these meetings as these issues relate to the CoCs.

Representatives from the Minnesota Interagency Council on Homelessness (MICH) subcommittee on Continuum of Care Planning send representatives to all Continuum of Care regional meetings.

As part of the DHS' and Minnesota Housing's participation in the MICH, staff are working with CoCs around the state to implement the State's Heading Home Plan, which includes many goals related to the needs of chronic homeless individuals and families, families with children, veterans, and unaccompanied youth. These goals include but are not limited to ending veteran homelessness, eliminating transitions to homelessness in youth and adult systems of care, and connecting homeless and highly mobile families with students to rental assistance and other resources to improve housing stability.

**Describe consultation with the Continuum(s) of Care that serves the state in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS**

*Consultation on allocation:*

The State's competitive RFP process for ESG funds continues to include the opportunity for each CoC representative(s) to participate in the evaluation of applications for funding. CoCs have taken advantage of this opportunity and offered meaningful and important input into the allocation of ESG funds in their regions. Additional meetings and opportunities for CoC consultation have been added to the RFP review process as well, ensuring a strong CoC voice in funding decisions.

*Performance Standards and Evaluation:*

The existing performance standards for ESG were developed in recent years during meetings with CoC representatives from around the state, and reflect the basic purpose of ESG shelter, prevention, and rapid re-housing funds to a) keep people safely sheltered, b) re-house persons who are homeless, and c) ensure persons are stably housed at program exit. ESG sub-recipient performance reports are sent to each CoC Coordinator and include information on these goals and sub-recipient performance. This set of outcomes, as well as specific annual goals for these ESG-funded activities, are included in the Outcomes Measures and Performance Standards section of this Plan.

*Policies and Procedures for HMIS:*

The HMIS Governing Group oversees the operation and administration of Minnesota's statewide HMIS system. The Governing Group includes representatives from each of the Continuum of Care(CoC) regions, state agencies, advocacy organizations and service providers. As members on the HMIS Governing Group, state agency staff participate in making joint decisions regarding the administration and funding of HMIS.

|          |  |  |
|----------|--|--|
| <b>1</b> | <b>Agency/Group/Organization</b>   | <b>Moorhead Public Housing</b>   |
|          | <b>Agency/Group/Organization Type</b>  | PHA  |
|          | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>Homelessness Strategy<br>Non-Homeless Special Needs<br>Economic Development<br>Market Analysis                |
|          | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Invited to participate in survey, public input meetings and to provide comments on the draft plan. Participated in a targeted interview. |
| <b>2</b> | <b>Agency/Group/Organization</b>   | <b>Lake &amp; Prairies CAP</b>   |
|          | <b>Agency/Group/Organization Type</b>  | Regional Organization  |
|          | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>Homelessness Strategy<br>Non-Homeless Special Needs<br>Economic Development<br>Market Analysis                |
|          | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Invited to participate in survey, public input meetings and to provide comments on the draft plan. Participated in a targeted interview. |
| <b>3</b> | <b>Agency/Group/Organization</b>   | <b>WCMA</b>  |
|          | <b>Agency/Group/Organization Type</b>  | Services-Employment  |
|          | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>Homelessness Strategy<br>Non-Homeless Special Needs<br>Economic Development<br>Market Analysis                |
|          | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Invited to participate in survey, public input meetings and to provide comments  |

|          |  |  |
|----------|--|--|
|          | <b>of the consultation or areas for improved coordination?</b>   | on the draft plan. Participated in a targeted interview.   |
| <b>4</b> | <b>Agency/Group/Organization</b>   | <b>Churches United</b>   |
|          | <b>Agency/Group/Organization Type</b>  | Services-Housing; elderly persons  |
|          | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>Homelessness Strategy<br>Non-Homeless Special Needs<br>Economic Development<br>Market Analysis                |
|          | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Invited to participate in survey, public input meetings and to provide comments on the draft plan. Participated in a targeted interview. |
| <b>5</b> | <b>Agency/Group/Organization</b>   | <b>NW Minnesota Legal Services</b>   |
|          | <b>Agency/Group/Organization Type</b>  | Services-Homeless; Fair Housing  |
|          | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>Homelessness Strategy<br>Non-Homeless Special Needs<br>Economic Development<br>Market Analysis                |
|          | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Invited to participate in survey, public input meetings and to provide comments on the draft plan. Participated in a targeted interview. |
| <b>6</b> | <b>Agency/Group/Organization</b>   | <b>White Earth Nation</b>  |
|          | <b>Agency/Group/Organization Type</b>  | Other government - Federal   |
|          | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>Homelessness Strategy<br>Non-Homeless Special Needs<br>Economic Development<br>Market Analysis                |

|          |  |  |
|----------|--|--|
|          | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Invited to participate in survey, public input meetings and to provide comments on the draft plan. Participated in a targeted interview. |
| <b>7</b> | <b>Agency/Group/Organization</b>   | <b>Lotus Center</b>  |
|          | <b>Agency/Group/Organization Type</b>  | Housing<br>Services-Health; Education; Employment;<br>Fair Housing   |
|          | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>Homelessness Strategy<br>Non-Homeless Special Needs<br>Economic Development<br>Market Analysis                |
|          | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Invited to participate in survey, public input meetings and to provide comments on the draft plan. Participated in a targeted interview. |
| <b>8</b> | <b>Agency/Group/Organization</b>   | <b>West Central Minnesota CoC</b>  |
|          | <b>Agency/Group/Organization Type</b>  | Continuum of Care  |
|          | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>Homelessness Strategy<br>Non-Homeless Special Needs<br>Economic Development<br>Market Analysis                |
|          | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Invited to participate in survey, public input meetings and to provide comments on the draft plan. Participated in a targeted interview. |
| <b>9</b> | <b>Agency/Group/Organization</b>   | <b>United Community Action Partnership</b>   |
|          | <b>Agency/Group/Organization Type</b>  | Housing<br>Services-Homeless; Education;<br>Employment   |

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|           | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>Homelessness Strategy<br>Non-Homeless Special Needs<br>Economic Development<br>Market Analysis  |
|           | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Invited to participate in survey, public input meetings and to provide comments on the draft plan. Participated in a community meeting and gave input on topics discussed. |
| <b>10</b> | <b>Agency/Group/Organization</b>   | <b>Global Father Foundation</b>  |
|           | <b>Agency/Group/Organization Type</b>  | Services-Education; Employment   |
|           | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>Homelessness Strategy<br>Non-Homeless Special Needs<br>Economic Development<br>Market Analysis  |
|           | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Invited to participate in survey, public input meetings and to provide comments on the draft plan. Participated in a community meeting and gave input on topics discussed. |
| <b>11</b> | <b>Agency/Group/Organization</b>   | <b>RS EDEN</b>   |
|           | <b>Agency/Group/Organization Type</b>  | Housing<br>Services-Education; Homeless; Health  |
|           | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>Homelessness Strategy<br>Non-Homeless Special Needs<br>Economic Development<br>Market Analysis Market Analysis                                  |
|           | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Invited to participate in survey, public input meetings and to provide comments on the draft plan. Participated in a   |

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|           | <b>of the consultation or areas for improved coordination?</b>   | community meeting and gave input on topics discussed  |
| <b>12</b> | <b>Agency/Group/Organization</b>   | <b>Winona County Criminal Justice Coordinating Council</b>  |
|           | <b>Agency/Group/Organization Type</b>  | Regional Organization   |
|           | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>Homelessness Strategy<br>Non-Homeless Special Needs<br>Economic Development<br>Market Analysis   |
|           | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Invited to participate in survey, public input meetings and to provide comments on the draft plan. Participated in a community meeting and gave input on topics discussed |
| <b>13</b> | <b>Agency/Group/Organization</b>   | <b>HRA of Hibbing</b>   |
|           | <b>Agency/Group/Organization Type</b>  | Housing   |
|           | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>Homelessness Strategy<br>Non-Homeless Special Needs<br>Economic Development<br>Market Analysis   |
|           | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Invited to participate in survey, public input meetings and to provide comments on the draft plan. Participated in a community meeting and gave input on topics discussed |
| <b>14</b> | <b>Agency/Group/Organization</b>   | <b>RSA Consultation</b>   |
|           | <b>Agency/Group/Organization Type</b>  | Services-Education  |
|           | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>Homelessness Strategy<br>Non-Homeless Special Needs  |

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|           |  | Economic Development<br>Market Analysis   |
|           | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Invited to participate in survey, public input meetings and to provide comments on the draft plan. Participated in a community meeting and gave input on topics discussed |
| <b>15</b> | <b>Agency/Group/Organization</b>   | <b>Duffy Development Company</b>  |
|           | <b>Agency/Group/Organization Type</b>  | Housing   |
|           | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>Homelessness Strategy<br>Non-Homeless Special Needs<br>Economic Development<br>Market Analysis Market Analysis                                 |
|           | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Invited to participate in survey, public input meetings and to provide comments on the draft plan. Participated in a community meeting and gave input on topics discussed |
| <b>16</b> | <b>Agency/Group/Organization</b>   | <b>Unity Church Unitarian Affordable Housing Team</b>   |
|           | <b>Agency/Group/Organization Type</b>  | Housing<br>Services-Homeless; Elderly Persons   |
|           | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>Homelessness Strategy<br>Non-Homeless Special Needs<br>Economic Development<br>Market Analysis Market Analysis                                 |
|           | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Invited to participate in survey, public input meetings and to provide comments on the draft plan. Participated in a community meeting and gave input on topics discussed |

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| <b>17</b> | <b>Agency/Group/Organization</b>   | <b>Murray County EDA</b>  |
|           | <b>Agency/Group/Organization Type</b>  | Other government-county   |
|           | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>Homelessness Strategy<br>Non-Homeless Special Needs<br>Economic Development<br>Market Analysis Market Analysis                                 |
|           | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Invited to participate in survey, public input meetings and to provide comments on the draft plan. Participated in a community meeting and gave input on topics discussed |
| <b>18</b> | <b>Agency/Group/Organization</b>   | <b>Rainbow Health Minnesota</b>   |
|           | <b>Agency/Group/Organization Type</b>  | Services-Health; Persons with HIV/AIDS  |
|           | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>Homelessness Strategy<br>Non-Homeless Special Needs<br>Economic Development<br>Market Analysis Market Analysis                                 |
|           | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Invited to participate in survey, public input meetings and to provide comments on the draft plan. Participated in a community meeting and gave input on topics discussed |
| <b>19</b> | <b>Agency/Group/Organization</b>   | <b>Project for Pride in Living</b>  |
|           | <b>Agency/Group/Organization Type</b>  | Housing<br>Services-Homeless  |
|           | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>Homelessness Strategy<br>Non-Homeless Special Needs<br>Economic Development<br>Market Analysis Market Analysis                                 |

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|           | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Invited to participate in survey, public input meetings and to provide comments on the draft plan. Participated in a community meeting and gave input on topics discussed |
| <b>20</b> | <b>Agency/Group/Organization</b>   | <b>Hennepin County Human Services</b>   |
|           | <b>Agency/Group/Organization Type</b>  | Other government-County   |
|           | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>Homelessness Strategy<br>Non-Homeless Special Needs<br>Economic Development<br>Market Analysis Market Analysis                                 |
|           | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Invited to participate in survey, public input meetings and to provide comments on the draft plan. Participated in a community meeting and gave input on topics discussed |
| <b>21</b> | <b>Agency/Group/Organization</b>   | <b>Minnesota State Colleges and Universities</b>  |
|           | <b>Agency/Group/Organization Type</b>  | Services-Education  |
|           | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>Homelessness Strategy<br>Non-Homeless Special Needs<br>Economic Development<br>Market Analysis   |
|           | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Invited to participate in survey, public input meetings and to provide comments on the draft plan. Participated in a community meeting and gave input on topics discussed |
| <b>22</b> | <b>Agency/Group/Organization</b>   | <b>City of Red Wing</b>   |
|           | <b>Agency/Group/Organization Type</b>  | Other government-Local  |

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|           | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>Homelessness Strategy<br>Non-Homeless Special Needs<br>Economic Development<br>Market Analysis  |
|           | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Invited to participate in survey, public input meetings and to provide comments on the draft plan. Participated in a community meeting and gave input on topics discussed. |
| <b>23</b> | <b>Agency/Group/Organization</b>   | <b>City of Lamberton</b>   |
|           | <b>Agency/Group/Organization Type</b>  | Other government-local   |
|           | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>Homelessness Strategy<br>Non-Homeless Special Needs<br>Economic Development<br>Market Analysis  |
|           | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Invited to participate in survey, public input meetings and to provide comments on the draft plan. Participated in a community meeting and gave input on topics discussed. |
| <b>24</b> | <b>Agency/Group/Organization</b>   | <b>Leech Lake Band</b>   |
|           | <b>Agency/Group/Organization Type</b>  | Housing<br>Services-Homeless   |
|           | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>Homelessness Strategy<br>Non-Homeless Special Needs<br>Economic Development<br>Market Analysis  |
|           | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Invited to participate in survey, public input meetings and to provide comments on the draft plan. Participated in a   |

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|    | <b>of the consultation or areas for improved coordination?</b>   | community meeting and gave input on topics discussed.  |
| 25 | <b>Agency/Group/Organization</b>   | <b>Minnesota Department of Employment and Economic Development (DEED)</b>  |
|    | <b>Agency/Group/Organization Type</b>  | Other government-State   |
|    | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>Homelessness Strategy<br>Non-Homeless Special Needs<br>Economic Development<br>Market Analysis  |
|    | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Invited to participate in survey, public input meetings and to provide comments on the draft plan. Participated in a community meeting and gave input on topics discussed. |
| 26 | <b>Agency/Group/Organization</b>   | <b>Southwest Minnesota CoC</b>   |
|    | <b>Agency/Group/Organization Type</b>  | Continuum of Care  |
|    | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>Homelessness Strategy<br>Non-Homeless Special Needs<br>Economic Development<br>Market Analysis  |
|    | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Invited to participate in survey, public input meetings and to provide comments on the draft plan. Participated in a community meeting and gave input on topics discussed. |
| 27 | <b>Agency/Group/Organization</b>   | <b>Three Rivers Community Action</b>   |
|    | <b>Agency/Group/Organization Type</b>  | Regional Organization  |
|    | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>Homelessness Strategy<br>Non-Homeless Special Needs   |

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|           |  | Economic Development<br>Market Analysis  |
|           | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Invited to participate in survey, public input meetings and to provide comments on the draft plan. Participated in a community meeting and gave input on topics discussed. |
| <b>28</b> | <b>Agency/Group/Organization</b>   | <b>Mid-Minnesota Legal Aid</b>   |
|           | <b>Agency/Group/Organization Type</b>  | Services-Persons with disabilities;<br>homeless; Fair Housing  |
|           | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>Homelessness Strategy<br>Non-Homeless Special Needs<br>Economic Development<br>Market Analysis  |
|           | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Invited to participate in survey, public input meetings and to provide comments on the draft plan. Participated in a community meeting and gave input on topics discussed. |
| <b>29</b> | <b>Agency/Group/Organization</b>   | <b>Southern Minnesota Regional Legal Services</b>  |
|           | <b>Agency/Group/Organization Type</b>  | Services-Persons with disabilities;<br>homeless; Fair Housing  |
|           | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>Homelessness Strategy<br>Non-Homeless Special Needs<br>Economic Development<br>Market Analysis  |
|           | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Invited to participate in survey, public input meetings and to provide comments on the draft plan. Participated in a   |

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|           |  | community meeting and gave input on topics discussed.  |
| <b>30</b> | <b>Agency/Group/Organization</b>   | <b>Development Services, Inc.</b>  |
|           | <b>Agency/Group/Organization Type</b>  | Housing  |
|           | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>Homelessness Strategy<br>Non-Homeless Special Needs<br>Economic Development<br>Market Analysis  |
|           | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Invited to participate in survey, public input meetings and to provide comments on the draft plan. Participated in a community meeting and gave input on topics discussed. |
| <b>31</b> | <b>Agency/Group/Organization</b>   | <b>Central Minnesota CoC</b>   |
|           | <b>Agency/Group/Organization Type</b>  | Continuum of Care  |
|           | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>Homelessness Strategy<br>Non-Homeless Special Needs<br>Economic Development<br>Market Analysis  |
|           | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Invited to participate in survey, public input meetings and to provide comments on the draft plan. Participated in a targeted interview.                                   |
| <b>32</b> | <b>Agency/Group/Organization</b>   | <b>Minnesota Housing Partnership</b>   |
|           | <b>Agency/Group/Organization Type</b>  | Housing  |
|           | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>Homelessness Strategy<br>Non-Homeless Special Needs<br>Economic Development<br>Market Analysis  |

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|           | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Invited to participate in survey, public input meetings and to provide comments on the draft plan. Participated in a targeted interview.                                   |
| <b>33</b> | <b>Agency/Group/Organization</b>   | <b>West Central CoC</b>  |
|           | <b>Agency/Group/Organization Type</b>  | Continuum of Care  |
|           | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>Homelessness Strategy<br>Non-Homeless Special Needs<br>Economic Development<br>Market Analysis  |
|           | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Invited to participate in survey, public input meetings and to provide comments on the draft plan. Participated in a targeted interview.                                   |
| <b>34</b> | <b>Agency/Group/Organization</b>   | <b>City of Princeton</b>   |
|           | <b>Agency/Group/Organization Type</b>  | Other government-Local   |
|           | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>Homelessness Strategy<br>Non-Homeless Special Needs<br>Economic Development<br>Market Analysis  |
|           | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Invited to participate in survey, public input meetings and to provide comments on the draft plan. Participated in a community meeting and gave input on topics discussed. |
| <b>35</b> | <b>Agency/Group/Organization</b>   | <b>Park Plaza Cooperative</b>  |
|           | <b>Agency/Group/Organization Type</b>  | Housing  |
|           | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>Homelessness Strategy<br>Non-Homeless Special Needs   |

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|           |  | Economic Development<br>Market Analysis  |
|           | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Invited to participate in survey, public input meetings and to provide comments on the draft plan. Participated in a community meeting and gave input on topics discussed. |
| <b>36</b> | <b>Agency/Group/Organization</b>   | <b>Cass Clay Community Land Trust</b>  |
|           | <b>Agency/Group/Organization Type</b>  | Regional Organization  |
|           | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>Homelessness Strategy<br>Non-Homeless Special Needs<br>Economic Development<br>Market Analysis  |
|           | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Invited to participate in survey, public input meetings and to provide comments on the draft plan. Participated in a community meeting and gave input on topics discussed. |
| <b>37</b> | <b>Agency/Group/Organization</b>   | <b>DMC EDA of Rochester</b>  |
|           | <b>Agency/Group/Organization Type</b>  | Other government-State   |
|           | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>Homelessness Strategy<br>Non-Homeless Special Needs<br>Economic Development<br>Market Analysis  |
|           | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Invited to participate in survey, public input meetings and to provide comments on the draft plan. Participated in a community meeting and gave input on topics discussed. |
| <b>38</b> | <b>Agency/Group/Organization</b>   | <b>Headwaters Regional Development Commission</b>  |

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|           | <b>Agency/Group/Organization Type</b>  | Regional Organization  |
|           | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>Homelessness Strategy<br>Non-Homeless Special Needs<br>Economic Development<br>Market Analysis  |
|           | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Invited to participate in survey, public input meetings and to provide comments on the draft plan. Participated in a community meeting and gave input on topics discussed. |
| <b>39</b> | <b>Agency/Group/Organization</b>   | <b>CEDA-City of Benson</b>   |
|           | <b>Agency/Group/Organization Type</b>  | Housing<br>Services-Education  |
|           | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>Homelessness Strategy<br>Non-Homeless Special Needs<br>Economic Development<br>Market Analysis  |
|           | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Invited to participate in survey, public input meetings and to provide comments on the draft plan. Participated in a community meeting and gave input on topics discussed. |
| <b>40</b> | <b>Agency/Group/Organization</b>   | <b>Otter Tail Housing HRA</b>  |
|           | <b>Agency/Group/Organization Type</b>  | Housing  |
|           | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>Homelessness Strategy<br>Non-Homeless Special Needs<br>Economic Development<br>Market Analysis  |
|           | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes</b>   | Invited to participate in survey, public input meetings and to provide comments  |

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|           | <b>of the consultation or areas for improved coordination?</b>   | on the draft plan. Participated in a community meeting and gave input on topics discussed.   |
| <b>41</b> | <b>Agency/Group/Organization</b>   | <b>Phumulani Minnesota African Women Against Violence</b>  |
|           | <b>Agency/Group/Organization Type</b>  | Services-Victims of Domestic Violence  |
|           | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>Homelessness Strategy<br>Non-Homeless Special Needs<br>Economic Development<br>Market Analysis  |
|           | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Invited to participate in survey, public input meetings and to provide comments on the draft plan. Participated in a community meeting and gave input on topics discussed. |
| <b>42</b> | <b>Agency/Group/Organization</b>   | <b>Damascus Way Rochester</b>  |
|           | <b>Agency/Group/Organization Type</b>  | Services-Education; homeless; health   |
|           | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>Homelessness Strategy<br>Non-Homeless Special Needs<br>Economic Development<br>Market Analysis  |
|           | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Invited to participate in survey, public input meetings and to provide comments on the draft plan. Participated in a community meeting and gave input on topics discussed. |
| <b>43</b> | <b>Agency/Group/Organization</b>   | <b>Alluma Cares</b>  |
|           | <b>Agency/Group/Organization Type</b>  | Services-Health; Education   |
|           | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>Homelessness Strategy<br>Non-Homeless Special Needs   |

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|           |  | Economic Development<br>Market Analysis  |
|           | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Invited to participate in survey, public input meetings and to provide comments on the draft plan. Participated in a community meeting and gave input on topics discussed. |
| <b>44</b> | <b>Agency/Group/Organization</b>   | <b>City of New Prague</b>  |
|           | <b>Agency/Group/Organization Type</b>  | Other government-Local   |
|           | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>Homelessness Strategy<br>Non-Homeless Special Needs<br>Economic Development<br>Market Analysis  |
|           | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Invited to participate in survey, public input meetings and to provide comments on the draft plan. Participated in a community meeting and gave input on topics discussed. |
| <b>45</b> | <b>Agency/Group/Organization</b>   | <b>Rainbow Research</b>  |
|           | <b>Agency/Group/Organization Type</b>  | Planning Organization  |
|           | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>Homelessness Strategy<br>Non-Homeless Special Needs<br>Economic Development<br>Market Analysis  |
|           | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Invited to participate in survey, public input meetings and to provide comments on the draft plan. Participated in a community meeting and gave input on topics discussed. |
| <b>46</b> | <b>Agency/Group/Organization</b>   | <b>Max Results</b>   |

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|    | <b>Agency/Group/Organization Type</b>  | Housing  |
|    | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>Homelessness Strategy<br>Non-Homeless Special Needs<br>Economic Development<br>Market Analysis  |
|    | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Invited to participate in survey, public input meetings and to provide comments on the draft plan. Participated in a community meeting and gave input on topics discussed. |
| 47 | <b>Agency/Group/Organization</b>   | <b>Minnesota Interagency Council on Homelessness</b>   |
|    | <b>Agency/Group/Organization Type</b>  | Services-Homeless  |
|    | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>Homelessness Strategy<br>Non-Homeless Special Needs<br>Economic Development<br>Market Analysis  |
|    | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Invited to participate in survey, public input meetings and to provide comments on the draft plan. Participated in a targeted interview.                                   |
| 48 | <b>Agency/Group/Organization</b>   | <b>Minnesota NAHRO</b>   |
|    | <b>Agency/Group/Organization Type</b>  | PHA  |
|    | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>Homelessness Strategy<br>Non-Homeless Special Needs<br>Economic Development<br>Market Analysis  |
|    | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes</b>   | Invited to participate in survey, public input meetings and to provide comments  |

|           |  |  |
|-----------|--|--|
|           | <b>of the consultation or areas for improved coordination?</b>   | on the draft plan. Participated in a targeted interview.   |
| <b>49</b> | <b>Agency/Group/Organization</b>   | <b>Rebuilding Together Minnesota</b>   |
|           | <b>Agency/Group/Organization Type</b>  | Housing  |
|           | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>Homelessness Strategy<br>Non-Homeless Special Needs<br>Economic Development<br>Market Analysis  |
|           | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Invited to participate in survey, public input meetings and to provide comments on the draft plan. Participated in a community meeting and gave input on topics discussed. |
| <b>50</b> | <b>Agency/Group/Organization</b>   | <b>Violence Free Minnesota</b>   |
|           | <b>Agency/Group/Organization Type</b>  | Services-Victims of Domestic Violence  |
|           | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>Homelessness Strategy   |
|           | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Provide feedback on domestic violence services needs and statistics.   |
| <b>51</b> | <b>Agency/Group/Organization</b>   | Standpoint Minnesota   |
|           | <b>Agency/Group/Organization Type</b>  | Services-Victims of Domestic Violence  |
|           | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>Homelessness Strategy   |
|           | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Provide feedback on domestic violence services needs and statistics.   |

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

The State agencies made attempts, including invitations to surveys, email outreach and public notices to be as inclusive as possible.

**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?   |
|---|--|--|
| Heading Home Together: Minnesota’s Plan to Prevent and End Homelessness | Minnesota Interagency Council on Homelessness (MICH) | Minnesota has a statewide plan to end homelessness which includes all CoCs in the state. This plan is coordinated by the MICH, in which DHS staff participate. The MN Plan to End Homelessness encompasses all the affordable housing and suitable living environment goals of the Strategic Plan. In addition, DHS and other state agency staff regularly attend local and regional CoC and FHPAP planning meetings to give and receive input to inform the Strategic Plan.                               |
| Olmstead Plan   | Olmstead Implementation Office                       | The Olmstead Plan is a broad series of key activities our state must accomplish to ensure people with disabilities are living, learning, working, and enjoying life in the most integrated setting. The Plan will help achieve a better Minnesota for all Minnesotans, because it will help Minnesotans with disabilities have the opportunity, both now and in the future to:<br><br>Live close to their family<br><br>Live more independently<br><br>Engage in productive Participate in community life. |

**Table 2 – Other local / regional / federal planning efforts**

**Describe cooperation and coordination among the State and any units of general local government, in the implementation of the Consolidated Plan (91.315(I))**

Consulted with many units of local government across the state when preparing the action plan, including inclusion in the survey, focus groups and other opportunities for feedback. This included local chambers of commerce, housing rehabilitation authorities and local leaders, such as mayors, city clerks, county officials and administrators.

**Narrative (optional):**

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

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

The State utilized a variety of citizen participation tools throughout the process to allow to input on the planning process. This included a survey, focus groups, outreach groups and public input sessions. The comments received from these various forums were integrated into the development of the plan in selecting priority needs and establishing goals.

**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          | Internet Outreach | Non-targeted/broad community | The 2022 Housing and Community Development Survey asked respondents various questions about the needs of housing and community development throughout the state. A total of 292 responses were received. | Outcomes of the survey results are presented throughout this document. | 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 Meetings  | Non-targeted/broad community | Four public meetings were held on June 22 (three sessions) and 23, 2022 (one session). These four focus groups covered affordable housing, facilities and infrastructure, community services, and general resident perspectives. | Participants included general public and stakeholders and comments focused on the need for more affordable housing and assistance with supportive services for those experiencing homelessness and those at risk of homelessness. The need for more services to support those with mental health challenges was also 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) |
|------------|-----------------------|------------------------------|--|--|---|---------------------|
| 3          | Public Comment Period | Non-targeted/broad community | A public comment period on the draft Consolidated Plan was held from July 1 – July 31. | Comments are received from several organizations. They are attached to this Plan along with responses from the agencies. Comments related to accessibility of the consultation process, location of affordable housing and types of housing, lead based paint, and barriers to affordable housing, among other things. | All comments were acknowledged and responded to in the attached document. |                     |

| 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          | Interviews       | Targeted stakeholders were interviewed to collect expertise on housing and community development topics. | 12 interviews were conducted   | Themes from the interview sessions included the rising costs of housing, lack of available housing units, difficulty retaining staff to provide services, and need to address pending imminent increase in the number of people at risk of homelessness given expiration of eviction moratorium. | All comments were accepted.                  |                     |

**Table 3 – Citizen Participation Outreach**

## SP-25 Priority Needs – 91.315(a)(2)

### Priority Needs

Table 44 – Priority Needs Summary

|                       |                                    |   |
|-----------------------|------------------------------------|---|
| 1                     | <b>Priority Need Name</b>          | Homelessness  |
|                       | <b>Priority Level</b>              | High  |
|                       | <b>Population</b>                  | Rural<br>Chronic Homelessness<br>Individuals<br>Families with Children<br>Mentally Ill<br>Chronic Substance Abuse<br>veterans<br>Persons with HIV/AIDS<br>Victims of Domestic Violence<br>Unaccompanied Youth |
|                       | <b>Geographic Areas Affected</b>   | Statewide   |
|                       | <b>Associated Goals</b>            | Facilitate Housing and Service for the Homeless   |
|                       | <b>Description</b>                 | Homelessness continues to be a high priority throughout the State   |
|                       | <b>Basis for Relative Priority</b> | This priority was established using the Needs Assessment, survey, public and stakeholder input.   |
|                       | 2                                  | <b>Priority Need Name</b>   |
| <b>Priority Level</b> |                                    | High  |
| <b>Population</b>     |                                    | Extremely Low<br>Low<br>Moderate<br>Large Families<br>Families with Children<br>Elderly<br>Public Housing Residents   |

|          |                                    |  |
|----------|------------------------------------|--|
|          | <b>Geographic Areas Affected</b>   | Non-Entitlement  |
|          | <b>Associated Goals</b>            | Address Housing Rehabilitation Needs-DEED  |
|          | <b>Description</b>                 | Fund housing rehabilitation activities for Low-Moderate income renter and owner households are a high priority in the state due to the level of cost burdens and other housing needs for these households. DEED. |
|          | <b>Basis for Relative Priority</b> | This priority needs was established through the Needs Assessment, survey, public and stakeholder input.  |
| <b>3</b> | <b>Priority Need Name</b>          | Economic Opportunities   |
|          | <b>Priority Level</b>              | High   |
|          | <b>Population</b>                  | Non-housing Community Development  |
|          | <b>Geographic Areas Affected</b>   | Non-Entitlement  |
|          | <b>Associated Goals</b>            | Support Economic Development and Workforce Needs   |
|          | <b>Description</b>                 | Economic Opportunities continue to be a high priority for the State to encourage continued economic growth.  |
|          | <b>Basis for Relative Priority</b> | This priority was established using the Market Analysis, surveys, public and stakeholder input.  |
| <b>4</b> | <b>Priority Need Name</b>          | Public Facilities and Infrastructure   |
|          | <b>Priority Level</b>              | High   |
|          | <b>Population</b>                  | Non-housing Community Development  |
|          | <b>Geographic Areas Affected</b>   | Statewide  |
|          | <b>Associated Goals</b>            | Improve Public Facilities and Infrastructure - DEED  |

|   |                                    |   |
|---|------------------------------------|---|
|   | <b>Description</b>                 | There are many community needs throughout the State that can be met through public facilities and infrastructure. This continues to be a high level need for the State.   |
|   | <b>Basis for Relative Priority</b> | This priority was established through the Needs Assessment, Market Analysis , surveys, and public and stakeholder input.  |
| 5 | <b>Priority Need Name</b>          | Community Services for LMI and vulnerable populations   |
|   | <b>Priority Level</b>              | High  |
|   | <b>Population</b>                  | Elderly<br>Frail Elderly<br>Persons with Mental Disabilities<br>Persons with Physical Disabilities<br>Persons with Developmental Disabilities<br>Persons with Alcohol or Other Addictions<br>Persons with HIV/AIDS and their Families<br>Victims of Domestic Violence |
|   | <b>Geographic Areas Affected</b>   | Statewide   |
|   | <b>Associated Goals</b>            | Provide Funds for Special-Needs Housing & Services  |
|   | <b>Description</b>                 | Special Needs populations continue to have a variety of unmet needs. Human services continue to be a high priority in the State.  |
|   | <b>Basis for Relative Priority</b> | This priority was established through the Needs Assessment, surveys, and public and stakeholder input.  |
| 6 | <b>Priority Need Name</b>          | Unit Production for LMI Renter Households   |
|   | <b>Priority Level</b>              | High  |

|  |                                  |  |
|--|----------------------------------|--|
|  | <b>Population</b>                | Extremely Low<br>Low<br>Moderate<br>Chronic Homelessness<br>Homeless Individuals<br>Homeless Families with Children<br>Persons with Mental Disabilities<br>Persons with Physical Disabilities<br>Persons with Developmental Disabilities<br>Persons with Alcohol or Other Addictions |
|  | <b>Geographic Areas Affected</b> | Statewide  |
|  | <b>Associated Goals</b>          | Increase Affordable Housing Opportunities - MH   |

## SP-35 Anticipated Resources - 91.315(a)(4), 91.320(c)(1,2)

### Introduction

The following section describes the annual allocation the State of Minnesota expects to receive over the next five years based on the allocation amounts for program years 2022-2026.

### 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<br>Admin and Planning<br>Economic Development<br>Housing<br>Public Improvements<br>Public Services | \$18,925,609                     | 37,407             | 4,998,772.66             | 23,961,788.66 | 75,702,436  | Department of Employment and Economic Development(DEED) |

| 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<br>Homebuyer assistance<br>Homeowner rehab<br>Multifamily rental new construction<br>Multifamily rental rehab<br>New construction for ownership<br>TBRA | \$9,442,511                      | 1,000,000          |                          |           | 37,770,044  | Minnesota Housing(MH)(acquisition, multifamily rental new construction and rehab only) |

| 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: \$ |   |                       |
| HOPWA   | public - federal | Permanent housing in facilities<br>Permanent housing placement<br>Short term or transitional housing facilities<br>STRMU<br>Supportive services<br>TBRA | \$386,643                        |                    |                          |           | 1,546,572   | MH                    |

| 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<br>Financial Assistance<br>Overnight shelter<br>Rapid re-housing (rental assistance)<br>Rental Assistance<br>Services<br>Transitional housing | \$2,219,254                      |                    |                          |           | 8,877,016   | MN Dept. of Human Services(DHS) |

| 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: \$ |   |   |
| HTF     | public - federal | Acquisition<br>Admin and Planning<br>Homebuyer assistance<br>Multifamily rental new construction<br>Multifamily rental rehab<br>New construction for ownership | \$10,497,206                     |                    |                          |           | 41,988,824  | MH(acquisition, multifamily rental new construction and rehab only) |

Table 46 - 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**

The HOME match requirement is met through tenant-based rental assistance from Minnesota Housing's Bridges program, which provides a rent subsidy for up to five years to persons with mental illness until they can obtain a permanent rent subsidy; and the State Housing Trust Fund program. The CDBG match will be a mix of private, local, and state resources such as loans from local banks, weatherization funds, Minnesota Housing rehabilitation loans. United States Department of Agriculture Rural Development (USDA RD), Public Facilities Authority (PFA), Minnesota Department of Health (MDH), CDBG-Economic Development match is through local initiatives, local banks, owner equity.

The ESG match requirements are met a variety of ways, depending on the level of state resources available to the Department of Human Services in a particular biennial funding cycle. DHS expects that for FFY2022 and the remainder of the plan, sufficient state appropriations (under the Emergency Services Program) will be available, allowing DHS to provide a state-level match for the entire annual ESG allocation. To ensure compliance with the ESG match requirement, DHS has notified all ESP grantees in the current biennium (whose awards are being used as state-level ESG match) of the prohibition on using those funds to match other federal awards, and of DHS intent to administer these state matching funds in the ways required by ESG regulation.

Minnesota Housing's HOME and NHTF programs leverage other agency, state funded, and low-income housing tax credit investment.

CDBG prior year resources include the 15% set-aside for the federal Minnesota Investment Fund program from the previous allocation, which is roughly \$2.5 million. The additional funds include reverted grant funds from other small cities grant awards.

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

The State will not use state-owned land to address the needs identified in the plan, though CDBG recipients may use locally-owned land.

**Discussion**

## SP-45 Goals Summary – 91.315(a)(4)

### Goals Summary Information

| Sort Order | Goal Name   | Start Year | End Year | Category                          | Geographic Area | Needs Addressed  | Funding                                     | Goal Outcome Indicator  |
|------------|---|------------|----------|-----------------------------------|-----------------|--|---|---|
| 1          | Address Housing Rehabilitation Needs - DEED             | 2022       | 2026     | Affordable Housing                | Non-Entitlement | Retain Decent Housing for Low-Moderate Income Renter/Owner | CDBG: \$49,429,884                          | Rental units rehabilitated: 500 Household Housing Unit<br><br>Homeowner Housing Rehabilitated: 1500 Household Housing Unit                                |
| 2          | Increase Affordable Housing Opportunities-MH            | 2022       | 2026     | Affordable Housing                | Statewide       | Unit Production for LMI Renter Households                  | HOME: \$48,212,555<br><br>HTF: \$52,486,030 | Rental units constructed: 450 Household Housing Unit<br><br>Rental units rehabilitated: 125 Household Housing Unit  |
| 3          | Support Economic Development and Workforce Needs - DEED | 2022       | 2026     | Non-Housing Community Development | Non-Entitlement | Economic Opportunities                                     | CDBG: \$6,562,500                           | Facade treatment/business building rehabilitation: 400 Business<br><br>Jobs created/retained: 100 Jobs<br><br>Businesses assisted: 20 Businesses Assisted |

| Sort Order | Goal Name   | Start Year | End Year | Category                          | Geographic Area | Needs Addressed                                       | Funding                  | Goal Outcome Indicator  |
|------------|---|------------|----------|-----------------------------------|-----------------|---|--------------------------|---|
| 4          | Facilitate Housing and Service for the Homeless     | 2022       | 2026     | Homeless                          | Statewide       | Homelessness  | ESG: \$<br>\$11,096,270  | Tenant-based rental assistance / Rapid Rehousing:<br>750 Households Assisted<br><br>Homeless Person Overnight Shelter:<br>46,500 Persons Assisted<br><br>Homelessness Prevention:<br>1,075 Persons Assisted:                                |
| 5          | Provide Funds for Special-Needs Housing & Services  | 2022       | 2026     | Non-Homeless Special Needs        | Non-Entitlement | Community Services for LMI and vulnerable populations | HOPWA: \$<br>\$1,933,215 | Homelessness Prevention:<br>1100 Persons Assisted   |
| 6          | Improve Public Facilities and Infrastructure - DEED | 2022       | 2026     | Non-Housing Community Development | Non-Entitlement | Public Facilities and Infrastructure                  | CDBG: \$<br>\$99,657,025 | Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit:<br>3000 Persons Assisted<br><br>Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit:<br>4750 Persons Assisted |

Table 49 – Goals Summary

## Goal Descriptions

|   |                         |  |
|---|-------------------------|--|
| 1 | <b>Goal Name</b>        | Address Housing Rehabilitation Needs-DEED  |
|   | <b>Goal Description</b> | Fund housing rehabilitation activities for low to moderate income homeowner and rental households through CDBG funds, DEED.                                |
| 2 | <b>Goal Name</b>        | Increase Affordable Housing Opportunities-MH   |
|   | <b>Goal Description</b> | <i>Fund housing activities for low-to-moderate income rental households, including renovation and new construction, and operating subsidy.</i>             |
| 3 | <b>Goal Name</b>        | Support Economic Development and Workforce Needs - DEED  |
|   | <b>Goal Description</b> | <i>Encourage robust economic growth through commercial building rehabilitation activities, the development and retention of businesses and jobs - DEED</i> |
| 4 | <b>Goal Name</b>        | Facilitate Housing and Service for the Homeless  |
|   | <b>Goal Description</b> | <i>Provide funds for service providers to meet the various housing and service needs of the homeless population in Minnesota</i>                           |
| 5 | <b>Goal Name</b>        | Enhance Special-Needs Housing & Services   |
|   | <b>Goal Description</b> | <i>Continue to fund programs that provide housing and services to special needs populations, including those with HIV/AIDS</i>                             |
| 6 | <b>Goal Name</b>        | Improve Public Facilities and - Infrastructure -DEED   |
|   | <b>Goal Description</b> | <i>Address community needs through improvements to public facilities and infrastructure</i>  |

**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)**

Minnesota Housing anticipates serving 575 households through rental housing rehabilitation or new construction. All National Housing Trust Fund activities must serve households who are extremely low income (ELI - 30% AMI), and all households assisted with HOME funds have incomes at or below 80% AMI. In addition, all households assisted with HOPWA funds must be at or below 80% AMI. Given past performance, Minnesota Housing anticipates that 43% of all activities will serve ELI households (250 households), with the remaining 57% of the units (325 households) serving low-income households primarily households with incomes less than 50% AMI.

DEED anticipates serving 2,000 households through housing owner and rental rehabilitation. All of these households must have incomes no greater than 80 percent AMI. Based on historical data as submitted in the Consolidated Action Plan and Evaluation Report, DEED anticipates that about 1/3 of these households will fall into each of the following HUD Section 8 income categories: extra low income, very low income, and low income.

## Expected Resources

### **AP-15 Expected Resources – 91.320(c)(1,2)**

#### **Introduction**

The following section describes the annual allocation the State of Minnesota expects to receive for program years 2022-2026

#### **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<br>Admin and Planning<br>Economic Development<br>Housing<br>Public Improvements<br>Public Services | <b>\$18,925,609</b>              | 37,407             | 4,998,772.66             | 23,961,788.66 | 75,702,436  | Department of Employment and Economic Development (DEED) |

| 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<br>Homebuyer assistance<br>Homeowner rehab<br>Multifamily rental new construction<br>Multifamily rental rehab<br>New construction for ownership<br>TBRA | \$9,442,511                      | 1,000,000          |                          |           | 37,770,044  | Minnesota Housing (MH) (acquisition, multifamily rental new construction, and rehab only) |
| HOPWA   | public - federal | Permanent housing in facilities<br>Permanent housing placement<br>Short term or transitional housing facilities<br>STRMU<br>Supportive services<br>TBRA             | \$386,643                        |                    |                          |           | 1,546,572   | MH  |

| 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<br>Financial Assistance<br>Overnight shelter<br>Rapid re-housing (rental assistance)<br>Rental Assistance Services<br>Transitional housing | \$2,219,254                      |                    |                          |           | 8,877,016   | MN Dept. of Human Services (DHS)                                     |
| HTF     | public - federal | Acquisition<br>Admin and Planning<br>Homebuyer assistance<br>Multifamily rental new construction<br>Multifamily rental rehab<br>New construction for ownership                           | \$10,497,206                     |                    |                          |           | 41,988,824  | MH (acquisition, multifamily rental new construction and rehab only) |

Table 50 - 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**

The HOME match requirement is met through tenant-based rental assistance from Minnesota Housing's Bridges program, which provides a rent subsidy for up to five years to persons with mental illness until they can obtain a permanent rent subsidy; and the State Housing Trust Fund program. The CDBG match will be a mix of private, local, and state resources such as loans from local banks, weatherization funds, Minnesota Housing rehabilitation loans, United States Department of Agriculture Rural Development (USDA RD), Public Facilities Authority (PFA), Minnesota Department of Health (MDH). CDBG-Economic Development match is through local initiatives, local banks, owner equity.

ESG match requirements are met two ways depending on the funded activity. For Emergency Shelter programs, DHS has required its sub-recipients to provide eligible matching funds at the sub-recipient level for each dollar requested in ESG funding. To ensure compliance with the requirement, DHS has required identification of matching funds in all sub-recipient contracts as well as a separate ESG Matching certification form that follows requirements outlined in the ESG Regulations. Because of the diverse nature of local homelessness program funding, it is not possible to summarize at the State level the exact types and amounts of each funding source, but the most common sources of matching funds include state Family Homelessness Prevention and Assistance Funds (FHPAP), state and HUD Transitional Housing Program funds (for scattered-site programs), Minnesota Community Action Grants, Private Foundations and Individual Donations.

For the ESG Prevention and Rapid Re-Housing providers, DHS has chosen to match ESG funding with state-appropriated Emergency Services Program (ESP), which is entirely used to fund emergency shelter (an eligible activity under ESG match regulations) Providers receiving these ESP funds certify they will be used in compliance with the ESG Regulations and are aware they cannot be used to meet any other match requirements.

Minnesota Housing's HOME and NHTF programs leverage other agency, state funded, and low-income housing tax credit investment.

CDBG prior year resources include the 15% set-aside for the federal Minnesota Investment Fund program from the previous allocation, which is roughly \$2.5 million. The additional funds include reverted grant funds from other small cities grant awards.

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

The State will not use state-owned land to address the needs identified in the plan, though CDBG recipients may use locally owned land.

**Discussion – N/A**

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives – 91.320(c)(3)&(e)

#### Goals Summary Information

| Sort Order | Goal Name                                    | Start Year | End Year | Category           | Geographic Area | Needs Addressed  | Funding                                     | Goal Outcome Indicator  |
|------------|--|------------|----------|--------------------|-----------------|--|---|---|
| 1          | Address Housing Rehabilitation Needs - DEED  | 2022       | 2026     | Affordable Housing | Non-Entitlement | Retain Decent Housing for Low-Moderate Income Renter/Owner | CDBG: \$14,851,845                          | Rental units rehabilitated: 100 Household Housing Unit<br><br>Homeowner Housing Rehabilitated: 300 Household Housing Unit |
| 2          | Increase Affordable Housing Opportunities-MH | 2022       | 2026     | Affordable Housing | Statewide       | Unit Production for LMI Renter Households                  | HOME: \$11,442,511<br><br>HTF: \$10,497,206 | Rental units constructed: 90 Household Housing Unit<br><br>Rental units rehabilitated: 25 Household Housing Unit          |

| Sort Order | Goal Name   | Start Year | End Year | Category                          | Geographic Area | Needs Addressed                                       | Funding              | Goal Outcome Indicator  |
|------------|---|------------|----------|-----------------------------------|-----------------|---|----------------------|---|
| 3          | Support Economic Development and Workforce Needs - DEED | 2022       | 2026     | Non-Housing Community Development | Non-Entitlement | Economic Opportunities                                | CDBG:<br>\$2,395,459 | Facade treatment/business building rehabilitation:<br>80 Business<br><br>Jobs created/retained:<br>20 Jobs<br><br>Businesses assisted:<br>4 Businesses Assisted   |
| 4          | Facilitate Housing and Service for the Homeless         | 2022       | 2026     | Homeless                          | Statewide       | Homelessness  | ESG:<br>\$3,219,254  | Tenant-based rental assistance / Rapid Rehousing:<br>150 Households Assisted<br><br>Homeless Person Overnight Shelter:<br>9300 Persons Assisted<br><br>Homelessness Prevention:<br>215 Persons Assisted |
| 5          | Enhance Special-Needs Housing & Services                | 2022       | 2026     | Non-Homeless Special Needs        | Non-Entitlement | Community Services for LMI and vulnerable populations | HOPWA:<br>\$386,643  | Homelessness Prevention:<br>220 Persons Assisted  |

| Sort Order | Goal Name   | Start Year | End Year | Category                          | Geographic Area | Needs Addressed                      | Funding              | Goal Outcome Indicator  |
|------------|---|------------|----------|-----------------------------------|-----------------|--------------------------------------|----------------------|---|
| 6          | Improve Public Facilities and Infrastructure - DEED | 2022       | 2026     | Non-Housing Community Development | Non-Entitlement | Public Facilities and Infrastructure | CDBG:<br>\$6,707,285 | Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit:<br>600 Persons Assisted<br><br>Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit:<br>950 Persons Assisted |

Table 51 – Goals Summary

### Goal Descriptions

|   |                         |  |
|---|-------------------------|--|
| 1 | <b>Goal Name</b>        | Address Housing Rehabilitation Needs-DEED  |
|   | <b>Goal Description</b> | Fund housing rehabilitation activities for low to moderate income homeowner and rental households through CDBG funds, DEED.                                |
| 2 | <b>Goal Name</b>        | Increase Affordable Housing Opportunities-MH   |
|   | <b>Goal Description</b> | <i>Fund housing activities for low-to-moderate income rental households, including renovation and new construction, and operating subsidy.</i>             |
| 3 | <b>Goal Name</b>        | Support Economic Development and Workforce Needs - DEED  |
|   | <b>Goal Description</b> | <i>Encourage robust economic growth through commercial building rehabilitation activities, the development and retention of businesses and jobs - DEED</i> |

|   |                         |  |
|---|-------------------------|--|
| 4 | <b>Goal Name</b>        | Facilitate Housing and Service for the Homeless  |
|   | <b>Goal Description</b> | <i>Provide funds for service providers to meet the various housing and service needs of the homeless population in Minnesota</i> |
| 5 | <b>Goal Name</b>        | Enhance Special-Needs Housing & Services   |
|   | <b>Goal Description</b> | <i>Continue to fund programs that provide housing and services to special needs populations, including those with HIV/AIDS</i>   |
| 6 | <b>Goal Name</b>        | Improve Public Facilities and Infrastructure -DEED   |
|   | <b>Goal Description</b> | <i>Address community needs through improvements to public facilities and infrastructure</i>                                      |

## AP-25 Allocation Priorities – 91.320(d)

### Introduction:

The following section describes the allocation priorities for FY 2017.

### Funding Allocation Priorities

|       | Address Housing Rehabilitation Needs-DEED (%) | Increase Affordable Housing Opportunities-MH (%) | Support Economic Development and Workforce Needs – DEED (%) | Facilitate Housing and Service for the Homeless (%) | Enhance Special-Needs Housing & Services (%) | Improve Public Facilities and Infrastructure -DEED (%) | Total (%) |
|-------|---|--|---|---|--|--|-----------|
| CDBG  | 62  | 0  | 8   | 0   | 0  | 30   | 100       |
| HOME  | 0   | 100  | 0   | 0   | 0  | 0  | 100       |
| HOPWA | 0   | 0  | 0   | 0   | 100  | 0  | 100       |
| ESG   | 0   | 0  | 0   | 100   | 0  | 0  | 100       |

Table 52 – Funding Allocation Priorities

### Reason for Allocation Priorities

Percentages include administration costs. Allocation priorities are based on needs in market study, needs assessment and public input.

**CDBG:** CDBG spending will be split between addressing housing rehabilitation needs, economic development and public facilities and infrastructure improvements. These spending priorities have been established through the planning process of where the most need is, as well as the capacity to make an impact on those in need in the State of Minnesota. The amount spent on each category is determined both by past performance and the current ability to meet housing and community development needs in the State. Economic Development funds will be utilized to support the Minnesota Investment Fund Program by providing gap financing to businesses creating jobs that benefit LMI workers.

**HOPWA:** Federal regulations dictate both the geography in which HOPWA funds may be used and the beneficiaries. Because only 15% of persons living with HIV/AIDS live in counties outside the seven-county Twin Cities metropolitan area and most are already housed, preventing homelessness is a more cost-effective approach than housing development or tenant-based rent assistance.

**NHTF:** National Housing Trust Funds will be directed towards efforts to enhance affordable housing opportunities through new construction and rehabilitation.

**HOME:** Many federally assisted and naturally affordable housing developments need rehabilitation to preserve their federal rent subsidy or affordability of their units. There is a growing need for affordable rental housing. All of the HOME funds will be directed toward enhancing the affordable housing opportunities for low to moderate income households throughout the State.

**ESG:** The total funds for ESG will be spent on services and housing, including homelessness prevention and emergency shelter, for homeless households and households at-risk of homelessness in the State.

**How will the proposed distribution of funds will address the priority needs and specific objectives described in the Consolidated Plan?**

For CDBG, the distribution of funds address the high needs of low to moderate income households, economic opportunities, and public facilities and infrastructure improvements that can be addressed within the CDBG regulations

For HOME and NHTF, the Consolidated Plan ranks the low to moderate income households as a high need. There is a high need for rental and owner rehabilitation. Funds will be targeted to projects that will serve low to moderate income households in the State.

Minnesota uses its HOPWA resources to maintain persons with HIV/AIDS in their current housing by providing emergency assistance because that is the most pressing need identified for this population.

As outlined in the Consolidated Plan, ESG funds will be used to meet the priority needs of providing emergency shelter, prevention and rapid re-housing to persons at-risk of, and experiencing, homelessness.

## AP-30 Methods of Distribution – 91.320(d)&(k)

### Introduction:

Formula grant funds from the CDBG, HOME, NHTF, HOPWA, and ESG programs may be directed to their highest and best use and anticipated to be successful first, within each set of program guidelines, given the funding of all housing and community development programs throughout Minnesota.

Still, the housing and community development needs statewide far exceed the available resources to address them. Therefore, it is necessary to consider needs by type of activity and geography in order to ensure the greatest impact with limited resources. Diversity across the state means that different areas have different housing and community development needs that are best addressed through different types of investment activities. Such activities are guided by selected ranking criteria. Minnesota's experience with these programs shows that these resources are indeed distributed throughout the state. The entire state will be served by HOME and ESG funds, and non-entitlement areas will be served by CDBG and HOPWA funds.

### Distribution Methods

**Table 53 - Distribution Methods by State Program**

|   |                            |   |
|---|----------------------------|---|
| 1 | <b>State Program Name:</b> | DEED: Small Cities Development Program and ED |
|   | <b>Funding Sources:</b>    | CDBG  |

|   |   |
|---|---|
| <p><b>Describe the state program addressed by the Method of Distribution.</b></p> | <p>Of the amount available for awards, DEED intends to provide SCDP funds in accordance with the following approximate allocations: 30 percent for Single Purpose Applications and 55 percent for Comprehensive Applications. The remaining 15 percent allocation is designated for DEED's federal economic development set-aside. If there is not a need from the unit administering federal economic set-aside funds, these funds will go towards SCDP projects, which would be approved by the Commissioner of DEED. Allocation percentages may be modified by the Commissioner of DEED if it is determined that there is a shortage of fundable applications in any category, as allowed in State Rules. DEED does not distribute funds based on specific geographic area. Applications are competitive in nature. Grant terms are typically 36 months but may longer depending on various factors including but not limited to timing of HUD release of funds and disasters affecting the project area.</p> <p>Method of Distribution calculation: The State subtracts from the annual CDBG Award the amount it sets aside for State Administration (\$100,000 + 3% of the CDBG Award (2% for Administration and 1% Administration for Technical Assistance which does not require a state match)) to determine the amount available for CDBG grants. The 1% Administration for Technical Assistance is to support state staff to provide technical assistance to grantees. This includes presenting at workshops on how to apply for and implement CDBG-funded activities and/or onsite technical assistance by state staff to grant recipients on improving some aspect of grant implementation. The State then allocates the amount available for CDBG grants to three categories based on State Rules. That is; 15% for Economic Development Set-Aside, 55% for SCDP Comprehensive Grants, and 30% for SCDP Single Purpose Grants. The Business Finance Unit administers the Economic Development Set-Aside Grant Program and the Community Assistance Division administers the Small Cities Development Program.</p> <p>No more than 20% of a CDBG allocation can be spent towards general administration. This includes general administration funds expended by DEED along with funds awarded and expended by grantees.</p> <p>Lastly, SCDP funds reverted from grantees who did not spend their total awarded grants in the previous fiscal years would be</p> |
|---|---|

|  |  |
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|  | <p>added to the current year's available funding amount. Grantees must bring forward any program income they have and spend it first before any new CDBG award funds will be released from DEED.</p> <p>Once DEED has determined the total CDBG allocation available to award, DEED will allocate this total to the Comprehensive and Single Purpose grant budget based on the ratio of Comprehensive funds to Single Purpose funds which is 64.7% to 35.3%. Once DEED determines the grant awards for the year, the percentage of grants awarded for comprehensive projects will be calculated. If that percentage is less than 55%, DEED staff will seek approval from the DEED Commissioner for the lesser percentage. DEED allows a maximum of 15% of project costs to administer the grant payable to grantees.</p> <p>In the event of a disaster, the State of Minnesota reserves the right to use funds for any eligible CDBG activity to an eligible grantee. In addition, in the event a HUD Five-Year Consolidated Plan has not yet been approved by HUD, DEED may award funding to eligible activities with reverted fund and unallocated past funding. Awarded applicants who have Program Income must expend this funding before any new CDBG funds will be disbursed. The State reserves the right to determine what activities are appropriate uses of funds based on needs of the community.</p> |
|--|--|

|  |  |
|--|--|
| <p><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></p> | <p>Projects are evaluated based on an assessment of need, impact and cost effectiveness of the applicant to complete the project in a timely manner. <b>SCDP funds:</b> Up to 240 of the points will be awarded based on evaluation of the proposed project to serve low- and moderate-income persons in relation to housing, public facilities, alleviate slum and blight in commercial areas, and/or address urgent need activities. Up to 180 points will be awarded based on evaluation of need, impact, and capacity for the proposed project. <b>Need-</b>Up to 90 points may be awarded for the following: benefit to low- to moderate income (LMI) persons and project addresses either substandard conditions or pose a threat to the health or safety of the occupants; an inadequate supply of affordable housing for low- to moderate income persons (LMI); or other documented condition that gives evidence of the need for improvement or additional units to the housing stock serving low- to moderate income persons. <b>Impact-</b> up to 90 points may be awarded for the following: an evaluation of the extent to which the proposed project will eliminate housing deficiencies or improve public facilities services serving low-to moderate income persons and. evaluation of administrative capacity to complete the activity in a timely manner. The application must include information documenting an applicant’s history in administering prior SCDP funds and/or other programs similar in nature, to determine whether the applicant can complete the proposed activity. Prior SCDP performance will be taken into consideration for future funding. <b>Cost-Effectiveness-</b>up to 30 points may be awarded for the following: an evaluation of the extent to which the proposed project will make cost-effective use of grant funds, including consideration with, and use of, funds from other public and private sources. per household benefit is reasonable; and project benefits existing, rather than future, population, unless growth is beyond applicant’s control. <b>State Demographics-</b>up to 30 points will be awarded based on: the number of poverty- persons and the percentage of persons residing in the area under the applicant’s jurisdiction. The per capita assessed valuation of the area under the jurisdiction of the applicant, such that points are awarded in inverse relationship to the applicant’s per capita assessed valuation.</p> <p>Economic Development funds: Funds disbursed via the Minnesota Investment Fund (MIF) to support economic development activities are selected based upon potential job</p> |
|--|--|

|   |  |
|---|--|
|   | creation and retention, project financial viability and community need factors. In more detail, projects are scored based upon the proposed project’s ability to improve local economic stability, unemployment rate, median income ratios, projected job creation & retention, wage and tax base impact, financial feasibility, and public and private investment ratios. |
| <b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b>  | Selection Criteria for the Minnesota Investment Fund is guided by Minnesota Statutes 116J.8731 which are available on the MN Office of the Revisor of Statutes web page. Application information is available on the State of Minnesota Department of Employment and Economic Development’s website, <a href="http://www.mn.gov/deed">www.mn.gov/deed</a> .                |
| <b>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b> | Not applicable.  |
| <b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b>  | Not applicable.  |
| <b>Describe how resources will be allocated among funding categories.</b>   | All funds must be used for economic development related activities undertaken by a Minnesota business.   |

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|---|--|--|
|   | <b>Describe threshold factors and grant size limits.</b>   | The maximum MIF grant size is \$1,000,000 and is determined by financing need, project leverage capacity and number of jobs to be created or retained.   |
|   | <b>What are the outcome measures expected as a result of the method of distribution?</b>   | Number of LMI jobs created or retained and private leverage achieved.  |
| 2 | <b>State Program Name:</b>   | Minnesota Emergency Solutions Grant Program  |
|   | <b>Funding Sources:</b>  | ESG  |
|   | <b>Describe the state program addressed by the Method of Distribution.</b>   | Emergency Solutions Grant Program.   |
|   | <b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b>  | For more detail on criteria, see "AP-30 ESG Methods of Distribution" Attachment under AP-90 Attachments.   |
|   | <b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b> | Announcement of the Request For Proposals for the ESG program will be distributed to all Department of Human Services - Office of Economic Opportunity funded housing agencies, all Continuum of Care committees, all members of the Minnesota Interagency Council on Homelessness, the Minnesota Coalition for the Homeless, the U.S. Department of Housing and Urban Development local office. The RFP will be posted on the Minnesota Department of Human Services website and published in the State Register. |

|  |   |
|--|---|
| <p><b>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b></p> | <p>FFY2022 ESG funds have been awarded through a two-year competitive Request For Proposals. Eligible applicants included non-profit 501 (c) (3) organizations and local units of government. Many of the non-profits are community and/or faith based.</p> <p>For more detail, see "AP-30 ESG Methods of Distribution" attachment under AP-90 Attachments.</p> |
| <p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>  | <p>Not Applicable.</p>  |

|  |   |
|--|---|
| <p><b>Describe how resources will be allocated among funding categories.</b></p> | <p><u>For FFY2022</u>, the State of Minnesota will use the maximum amount of funding allowable for <u>emergency</u> shelter activities, which in FY20<u>22</u> is 60 percent of the State's estimated allocation or \$1,331,552</p> <p>The State of Minnesota and its sub-recipients will use the maximum allowed amount for ESG Administration. A portion of these funds are shared with sub-recipients to assist in administration of their ESG programs. A portion of administrative funds are shared with sub-recipients to assist them in administration of their ESG programs.</p> <p>Additional ESG funds above the allowable shelter and administration limits will be used exclusively for prevention and rapid re-housing activities.</p> <p>The State has historically used the maximum allowable amount of its ESG allocation to fund emergency shelter. However, the State will continue to monitor the levels of emergency shelter, homelessness prevention and rapid re-housing funds available to non-entitlement areas of the state in future plan years and adjust the allocation of funding among each category accordingly.</p> |
| <p><b>Describe threshold factors and grant size limits.</b></p>                  | <p>The State of Minnesota does not have grant limits in awarding ESG funds. However, because DHS attempts to achieve statewide distribution with emergency shelter and re-housing funds, sizes of grant awards may be limited by available funds and the number of requests. There are no threshold factors for funding other than those identified in "AP-30 ESG Methods of Distribution" attachment under AP-90 Attachments, which is limited to the timely and complete submission of application materials by the deadline.</p>   |

|   |   |   |
|---|---|---|
|   | <p><b>What are the outcome measures expected as a result of the method of distribution?</b></p> | <p>For the upcoming program year, we anticipate that 9,300 homeless persons will receive adequate emergency shelter and that 365 households who are either at-risk of, or currently experiencing homelessness, will be moved to permanent housing.</p> <p>By funding a continuum of activities with ESG, we address the needs of homeless persons for both crisis and short or medium-term housing, including emergency shelter, prevention (re-housing those at-risk of homelessness) and rapid re-housing (for those already homeless by HUD's definition). We are the only State agency providing funding for emergency shelter activities, which meets a critical needs gap in rural parts of Minnesota.</p>  |
| 3 | <p><b>State Program Name:</b></p>   | <p>Minnesota Housing National Housing Trust Fund (NHTF)</p>   |
|   | <p><b>Funding Sources:</b></p>  | <p>NHTF</p>   |
|   | <p><b>Describe the state program addressed by the Method of Distribution.</b></p>               | <p>Minnesota will not allocate funds to subgrantees for their distribution to owners/developers. Instead, NHTF funds will be distributed directly to owner/developers of affordable housing via Minnesota Housing's annual Consolidated Request for Proposals. The NHTF funds will be part of a deferred pool of resources, through Minnesota Housing, which are targeted to address specific and critical needs in rental housing markets, including but not limited to geographic priority areas: transit-oriented development, areas with strong job markets or job growth, areas that need more affordable housing, and tribal areas. Minnesota Housing retains the option to offer funds on a pipeline basis in the event qualified proposals are insufficient to use the entire NHTF grant.</p> |

|  |  |
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| <p><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></p> | <p>Developers, owners, and the entire development team are required to meet the same eligibility criteria as for other agency programs, as specified in the Consolidated RFP.</p> <p>The needs of very low-income renters, those with incomes below 50% of area median income (AMI), are a high priority for the State of Minnesota, with significant priority on extremely low income renters (below 30% AMI). Applications will be evaluated in accordance with need and scoring criteria that emphasizes other State priorities. For the 2022 consolidated RFP, these strategic priorities include:</p> <ol style="list-style-type: none"> <li>1. Preservation of developments that contain existing federal assistance or other critical affordable units at risk of loss,</li> <li>2. Address specific and critical rental housing needs, for example, serving the lowest income tenants, workforce housing, senior housing, housing for persons with disabilities, increasing opportunities for affordable housing in communities, and</li> <li>3. Prevent and end homelessness through permanent supportive housing.</li> </ol> <p>These priorities may change slightly from year to year. Minnesota Housing also gives priority in awarding funding to the proposals that best meet selection priorities in effect at the time of the RFP. These selection priorities are provided with each Consolidated Request for Proposal process..</p> <p>Consistent with Affirmative Fair Housing Marketing regulations, Minnesota Housing requires that each housing provider carry out an affirmative marketing program to attract prospective buyers or tenants in the housing market area regardless of race, creed, color, religion, sex, national, origin, marital status, status with regard to public assistance, disability, sexual orientation, or familial status. The plan should detail how the housing provider intends to market and attract populations that are least likely to apply to the project, including persons with disabilities and households of color.</p> |
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|--|--|
| <p><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p>  | <p>Not Applicable.</p>   |
| <p><b>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b></p> | <p>Not Applicable.</p>   |
| <p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>  | <p>Not Applicable.</p>   |
| <p><b>Describe how resources will be allocated among funding categories.</b></p>   | <p>Minnesota Housing will allocate 10% of its grant to program planning and administration costs; up to one-third for operating cost assistance or funding operating cost assistance reserves; the balance of the grant will provide capital funding for new construction or rehabilitation of NHTF units.</p> |

|   |  |  |
|---|--|--|
|   | <b>Describe threshold factors and grant size limits.</b>                                 | <p>Rental applications under the Consolidated RFP must meet the requirements specified in the RFP at that time. Recent requirements were that the project had to meet the factors of project feasibility, and the applicant had to meet the factors of organizational capacity. Application processes and eligibility criteria for the 2022 Consolidated RFP and subsequent RFPs may be found at MHFA's website <a href="http://www.mnhousing.gov">www.mnhousing.gov</a>.</p> <p>There are no limits on assistance amounts other than those established in regulations. Amounts of assistance are sized to specific project needs.</p> |
|   | <b>What are the outcome measures expected as a result of the method of distribution?</b> | Numbers of rental units rehabilitated and preserved or constructed or provided operating assistance.   |
| 4 | <b>State Program Name:</b>   | Minnesota Housing-HOME   |
|   | <b>Funding Sources:</b>  | HOME   |
|   | <b>Describe the state program addressed by the Method of Distribution.</b>               | <p>This is a statewide program that provides deferred loans to help cover financing gaps of new construction, rental rehabilitation, or acquiring and rehabilitating qualified affordable rental housing for the purpose of preserving rental subsidies or the affordability of non-federally assisted housing. Assistance will generally be in the form of a 0 percent interest rate, 30-year deferred loan due and payable at the end of the term. Minnesota Housing provides the loans directly to the owners.</p>  |

|   |  |
|---|--|
| <p><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></p>  | <p>HOME is administered as a statewide program that provides deferred loans to help cover financing gaps of new construction, rehabilitating or acquiring and rehabilitating permanent affordable rental housing with or without long-term, project-based federal subsidies for the purpose of preserving the subsidies or the affordability of housing without federal subsidies.</p> <p>HOME funds are primarily provided through the Minnesota Housing Consolidated RFP, which awards assistance from several different sources. Applicants are not required to identify a funding source, other than tax credits. Selected applications and developers are evaluated and offered the best matched funding source. If funding is sufficient, the Agency may offer a portion of the HOME funds on a pipeline basis. Projects are evaluated for financial feasibility; developer capacity and fiscal condition are also considered. All projects are required to be selected by the Minnesota Housing Board of Directors and obtain approval from the agency's Mortgage Credit Underwriting committee before loans may be closed.</p> <p>While rehabilitation is a priority for Minnesota Housing, a portion of funds allocated will likely be used for rental new construction, depending on the types of applications received in response to the consolidated RFP, scoring, funding sources available, and the relative need for new construction or preservation.</p> |
| <p><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p> | <p>Not Applicable.</p>   |

|  |   |
|--|---|
| <p><b>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b></p> | <p>Not Applicable.</p>  |
| <p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>  | <p>Not Applicable.</p>  |
| <p><b>Describe how resources will be allocated among funding categories.</b></p>   | <p>Ninety percent of the program funds will be directed towards programs. Up to 10 percent will be used for administration.</p>   |
| <p><b>Describe threshold factors and grant size limits.</b></p>  | <p>There are no limits on assistance amounts other than those established in HOME regulations. The amount of assistance is sized to meet project needs.</p> <p>Rental applications under the Consolidated RFP must meet the requirements specified in the RFP at that time. Recent requirements were that the project had to meet factors of project feasibility, and the applicant had to meet factors of organizational capacity. Application processes and eligibility criteria for the 2022 Consolidated RFP may be found at MHFA's website <a href="http://www.mnhousing.gov">www.mnhousing.gov</a>.</p> |

|   |  |  |
|---|--|--|
|   | <b>What are the outcome measures expected as a result of the method of distribution?</b>   | Numbers of rental units rehabilitated and preserved or constructed.  |
| 5 | <b>State Program Name:</b>   | Minnesota Housing-HOPWA  |
|   | <b>Funding Sources:</b>  | HOPWA  |
|   | <b>Describe the state program addressed by the Method of Distribution.</b>   | Grant funds are currently awarded to the Rainbow Health, which provides the assistance to low-income persons diagnosed with HIV/AIDS, and their families. Rainbow Health is currently the only HOPWA formula project sponsor in Minnesota outside of the metropolitan area and works in partnership with over 1,000 volunteers in community and outreach efforts. Rainbow Health provides a range of support services for persons with HIV, works to prevent the spread of HIV, and collaborates with several community organizations. |
|   | <b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b>  | With limited funding, renewal of existing grants is a priority. If renewal of existing grant is not possible, Minnesota Housing will allocate resources to another grantee or grantees that can provide similar services and have capacity to deliver the necessary services.  |
|   | <b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b> | Not Applicable.  |

|  |   |
|--|---|
| <p><b>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b></p> | <p>Not Applicable.</p>  |
| <p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>  | <p>Following priorities set by the Minnesota HIV Housing Coalition, which acts as an advisory group to make recommendations for HOPWA funding, renewal funding for ongoing programs receive funding priority. There is a separate renewal process for ongoing HOPWA programs. If funds appropriated exceed the amount necessary to continue those programs at comparable levels, or if priorities change to address changing needs, funds may be made available through an RFP process for application by all eligible sponsors, including eligible grassroots faith-based and other community-based organizations unless a sole source contract can be justified given the dollar size of the grant and specific services that must be provided.</p> |
| <p><b>Describe how resources will be allocated among funding categories.</b></p>   | <p>There is only one funding category and all resources are allocated to it.</p>  |
| <p><b>Describe threshold factors and grant size limits.</b></p>  | <p>With limited funding, renewal of existing grants is a priority.</p>  |
| <p><b>What are the outcome measures expected as a result of the method of distribution?</b></p>  | <p>Assisted households remain in their homes.</p>   |

**Discussion:**

## Affordable Housing

### AP-55 Affordable Housing – 24 CFR 91.320(g)

**Introduction:**

The term affordable housing that is used in 24 CFR 92.252 and 92.254 includes several elements that are not requirements of ESG, HOPWA and CDBG. Therefore, the only units that receive federal assistance that can be assured of meeting the standard of "affordable housing" and are described here are HOME units.

| <b>One Year Goals for the Number of Households to be Supported</b> |     |
|--|-----|
| Homeless   | 0   |
| Non-Homeless   | 515 |
| Special-Needs  | 0   |
| Total  | 515 |

**Table 56 - One Year Goals for Affordable Housing by Support Requirement**

| <b>One Year Goals for the Number of Households Supported Through</b> |   |
|--|---|
| Acquisition of Existing Units  | 0 |
| Total  | 0 |

**Table 57 - One Year Goals for Affordable Housing by Support Type**

**Discussion:**

**AP-70 HOPWA Goals – 91.320(k)(4)**

| <b>One year goals for the number of households to be provided housing through the use of HOPWA for:</b>      |            |
|--|------------|
| Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family        | 220        |
| Tenant-based rental assistance   | 0          |
| Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds               | 0          |
| Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds | 0          |
| <b>Total</b>   | <b>220</b> |

## MN CONSOLIDATED PLAN COMMENTS

### 1. MHFA – Jodell Swenson

I think there is a typo on page 80.

As indicated in the data above, throughout Minnesota, over 1,200,000 homes have an LBP Hazard. If an estimated sixty percent (40%) of these units are occupied by LMI families then there are over 480,000 with LBP Hazards.

**Response:** The final Consolidated Plan has been corrected to 40%.

### 2. Resident –

Request for assistance

### 3. MICAH – Board President – Gary Kwong

I didn't see in the consolidated plan that geographic balance meant towns under 500, 1000, etc which are outstate are considered as well as cities 5000 and their suburbs being considered. This is especially important in the area of preserving small town and rural housing due to the need for economic viability being maintained. An issue is not homelessness only but the lack of affordable housing preventing expansion or starting of businesses where employment is possible only when affordable housing is present. Rural housing should include rehab of single homes not within a community as well as in the borders of the town.

I didn't see anything about social service agencies serving refugees or immigrants or tribal groups being included in the community groups where input was solicited. I didn't notice any commitment to inform non-English speakers orally and in writing in their own language at an appropriate education level about housing resources possible to serve their needs or soliciting their input as to their needs. Were interpreters available and used at community input sessions - I didn't see any mention of that.? On-line or written surveys done without considering the range of English or any other language understanding due to education omits a large number of people. This is especially true now that there is no language competency required to graduate from high school much less for those who drop out before they are "seniors". Are developers required to take into account language and education levels of tenants or the community where they hope to develop property?

**Response:** Rehabilitating of existing homes and new construction in rural areas is a critical housing need. Minnesota Housing's Consolidated Request for Proposal process does incentivize housing developments in communities that need housing, including rural areas. Additionally, Minnesota Housing has non-federal programs that exclusively serve new construction and rental rehab needs in rural and Greater Minnesota. Lastly, DEED's use of Community Development Block Grant is utilized for single family and rental rehab in rural parts of the State.

The State has an ongoing obligation to be in consultation with tribes and tribal leadership under the state statute and so communication with these groups is ongoing. Additionally, organizations consulted in the general consultation outreach work to serve these populations generally and were able to speak to issues affecting these groups. The community needs survey was available in English and Spanish. Under DEED Limited English Proficiency Plan, no person is denied access to any DEED program, activity, or service because he/ she does not speak English or communicates in English on a limited basis. DEED fosters effective communication between its staff and customers with LEP by making appropriate language assistance services available when needed. This is done in a timely manner and at no cost to the customer.

#### 4. East Metro Civic Alliance – Edward McDonald

As you may be aware, the HUD Section 3 program requires that recipients of certain HUD financial assistance provide training, employment, contracting, and other economic opportunities to low- and very low-income persons, especially recipients of government assistance for housing and to businesses that provide economic opportunities to low- and very low-income persons.

I have not found any mention of this requirement or results with the implementation of this requirement in the State’s proposed consolidated plan or the 2021 Capers report.

While we appreciate your efforts reported in **Capers Goal 2: Address Discrimination and Improve Opportunities for Mobility, Challenge 2.c. | Challenges accessing economic and other opportunities, Action:** Promote contracting opportunities for women and Black, Indigenous, and People of Color-owned business entities in all programs.

This section frequently uses the acronym BIPOC which is not a legal identifier of a population group under Federal, State, or Local laws. The legal identifiers are Section 3 eligible, Protected Group Members, Protected Class Members, Targeted Group Business, Minority Business Enterprise, Women Business Enterprise, Disadvantaged Business Enterprise, Veteran Business Enterprise, and Business owned by a Person with a Disability. Federal, State, and Local laws require an availability analysis for section 3 eligibles, each protected group member, WBEs, MBEs, DBEs, TGBs, VBEs, or OPDs to determine those willing, able, and available to participate.

Then benchmarks are established for participation if not already set. BIPOC aggregates these populations, omits others, and allows appointing authorities to facilitate preference with utilization, underutilization, no utilization, and outright discrimination.

We respectfully request that this compliance violation is corrected in the current proposed consolidated plan. We also ask that a robust required section 3 eligible, protected group members, protected class members, WBE, MBE, DBE, TGB, VBE, or OPD economic development/job creation and job training program be written in the proposed consolidated

plan to comply with the use of certain HUD and state funds used for housing development, programs, and services.

We can no longer allow this systemic hatred and injustice and watch socioeconomic disparities grow in our communities. These intentional injustices have destroyed the people and their communities, pushed them to nothing more than a commodity, and wasted willing, able, and available human capital wanting to do this vital work.

**Response:** HUD published a final Section 3 Rule updating the 1994 interim rule on 11/30/2020 where reporting is required for contracts signed on or after July 1, 2021. The state is collecting data and reporting to HUD at the end of the federal fiscal year. The state has extensively conducted training for program administrators on how to connect with potential workers and businesses and directs applicants to Section 3 publication and regulations in HUDS website. The State continues to work toward meaningful accomplishments of the goals established in Section 3. Grants awarded under this Consolidated Plan will be required to adhere to the Section 3 Final Rule requirements codified at 24 CFR Part 75.

#### **5. Suburban Hennepin Housing Coalition member - Ruth Paradise**

While we applaud the inclusion of issues such as zoning, land use, etc. in the State Plan, some of the cost containment strategies included in the plan will be difficult to implement by smaller cities. While smaller cities are in critical need of outside funding in order to build new affordable housing, as well as fund preservation initiatives for existing affordable housing, it is difficult for them to compete for outside funding in the competitive situation we find ourselves in today.

It is suggested that there be other ameliorating actions a city can take to qualify for state funding for affordable housing development. Passage of legislative policies that are known to increase access to affordable housing for those most in need can be an important tool.

Legislative action can be used in addition to incentives that reduce costs for developers. For example, legislative actions taken by cities such as: 1) passage of a Fair Housing Policy statement; 2) 4D Affordable Housing Policy legislation; 3) Tenant Protection Ordinance; 4) Adoption of an Eviction/non-renewal of lease Policy to protect tenants; 5) Housing Choice / Source of Income Ordinance to protect tenant rights; and, 6) Mixed Income Housing legislation for new housing developments. Planned use of renewable energy could also be a consideration. Utility bills can be lower when solar panels or wind energy are used in larger new affordable housing developments.

This type of additional action as qualifying factors to be included in funding considerations would provide incentives to cities to pass legislation that would protect the rights of people facing economic and societal discrimination. This could be a powerful tool to be added to the State Plan's current consideration of "education in communities". Legislative initiatives would also be "scorable" when judging applications.

The problem is that smaller cities do not have the tax base and revenues to allow them to offer the necessary financial incentives to developers that would encourage and enable developers to build affordable housing. In addition, many smaller cities lack the funds to provide matching grant money in order to qualify for available grants.

Suburban cities often have fully or near-fully developed land with a limited inventory of available buildable vacant land. This leads to higher market values for vacant land, making available property less attractive to developers because of the cost. Higher land values also make existing affordable properties poorer candidates for affordable housing development or preservation by developers. When land does become available it is seldom suitable for a large, high density affordable housing development such as that favored by banks when giving the best rates in loans for property development.

A further barrier to finding suitable property to be developed as affordable housing is that most available property is privately owned. Privately owned properties can be put up for sale and sold before a city has the opportunity to work with the owner to find a buyer interested in developing or preserving needed affordable housing. These properties are most often sold for market rate development.

The funding application process itself can also present a barrier by the use of a “Scoring Wizard” that judges applications based on algorithms. We assume that a large majority of the items listed in the consolidated plan as incentives to be given to developers would be part of the scored qualifying markers. Smaller cities that cannot provide these desired incentives will automatically not score high enough to qualify for funding. Adding legislative actions can create a more flexible scoring system, while positively increasing access to affordable housing to those in need.

**Response:** Minnesota Housing agrees that building more housing in suburban areas is critical and that a city’s ability to financially contribute to housing developments is a case-by-case situation impacted by each city’s finances and tax base. Minnesota Housing does evaluate at geographic balance throughout every step of the awarding process and evaluates how scoring impacts the balance between the various geographies. There are scoring criteria specifically provide points for underserved communities in need of housing. Additionally, scoring criteria suggested above and be difficult to do objectively.

These comments are particularly relevant to Minnesota Housing’s scoring system and will be shared directly with that team. Additionally, Minnesota Housing continues to ask the State Legislature and Congress for substantially more resources to address the chronic underfunding in affordable housing development resources.

6. **MICAH- Metropolitan Interfaith Council on Affordable Housing - Sue Watlov Phillips, M.A.**

**The plan provided the basic information required but lack specificity in many areas and appeared to be copied and pasted from previous reports. The data was not recent and incomplete in many sections. While we are encouraged to see more outreach for input, computerized surveys work well with Caucasian middle class people and less so with communities that are to be served by these funds. The community input was not accessible in this document. We strongly encourage people experiencing homelessness/housing crisis at every decision making table of these programs, so the design, implementation, operation and evaluation meet the needs of people utilizing them.**

**Response:** Thank you for the comment.

Providing a suitable living environment entails improving the safety and livability of neighborhoods, **abiding by Fair Housing Laws and increasing access to housing choice and opportunities in the community - do not require integration. Equity in place in every community is critical.**

**Response:** Thank you for the comment.

Evaluation of past performance The State's evaluation of its past performance has been completed in a thorough Consolidated Annual Performance and Evaluation Report (CAPER). The past year CAPERs can be found **here and here. Links did not work to access this report**

**Response:** URLs have been added to the document.

**MICAH agrees** with Results from the 2022 Housing and Community Development Needs Survey showed that construction of new rental housing and rental housing for very low-income households were considered to have a high need for funding. There were 483,733 households under 80 percent Median Family Income (MFI) with housing problems based on available CHAS data from 2013- 2017. Of these households, 204,546 household were in the 0-30% MFI category. Among all households statewide, 78 percent of households in the 0-30% MFI category have at least one housing problem. The most common housing problem faced by Minnesotans is cost burden. There were 128,760 renter households and 96,820 homeowner households severely cost burdened by their housing, paying more than 50% of their income on housing costs. Additionally, some racial/ethnic groups faced a disproportionate share of housing problems. According to the point-in-time count, the counted homeless population was 7,977 in 2020. Non-homeless special needs populations in the state include the elderly and frail elderly, persons living with disabilities, persons with alcohol or other drug addiction, victims of domestic violence, and persons living with HIV and their families. These populations are not homeless but are at the risk of becoming homeless and therefore often require housing and service programs.

**Response:** Thank you for the comment.

**Page 46** As seen above, the amount of housing need in the State has increased, **especially for household that are cost burdened.** By 2020, the number of cost burdened households continued to grow with renters facing this problem at high rates. Rates were especially higher for households in the 0-30% AMI income category. Eighty percent of renters in the 0-30% AMI

income category are cost burdened with nearly 60% experiencing severe cost burden. In the 31 – 50% AMI category, nearly 70% are cost burdened with about 20% being severely cost burdened.

**Response:** Thank you for the comment.

**Page 54 MICAH agrees** Disproportionate needs show up for Black/African Americans and Native American groups. It should be noted that communities of color, particularly Black/African American and Native American residents, are far more likely to live in the lowest income categories. The lowest income levels demonstrate that highest housing needs in the data. In Minnesota, 44 percent of white renters are cost burdened. In contrast, 58 percent of Black/African American renters and 54% of Native American renters are cost burdened. Further, in every racial category, black, indigenous, and people of color are more likely to experience cost burden than white households due to historical injustices such as redlining, racial covenants, and disinvestment.

**Response:** Thank you for the comment.

If they have needs not identified above, what are those needs? No additional needs have been identified. **Discrimination, lack of access to credit and financing, cultural competency, and disparities in homeownership.**

**Response:** Thank you for the comment.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community? **Why, was this question, left unanswered? We still have one of the most segregated communities in the U.S. – Minneapolis./St Paul Metro area.**

**Response:** See information provided at Section MA-50, which provides the census tracts where racial and ethnic groups are concentrated.

#### **Page 57**

In Minnesota, there are two primary sources of Homeless Needs data – the HUD Point in Time Count and the Wilder Minnesota Homelessness Study- **Minnesota needs to have people experiencing homelessness at every decision making table including help writing this report to design a system that meets their needs. The PIT is an archaic count of those who can get into services one day in January and a limited count of people unsheltered and does not include the majority of the 17,000 children and youth experiencing homelessness in MN according to Department of Education. The Wilder Study does provide a more in depth survey with people experiencing homelessness.**

**Response:** The State recognizes the many limitations to nearly all data, including the Point in Time count, regarding the prevalence of homelessness in Minnesota. The plan references these limitations in various places, and the State will continue to seek the best available data sources for our work.

**Page 58**

Based on 2020 PIT data, the number of families in need of housing assistance including both sheltered and unsheltered families is 3,214. The number of veteran families in need of housing assistance is 315. **.MICAHA strongly disagrees with using the PIT to determine this data.**

**Response:** The State recognizes the many limitations to nearly all data, including the Point in Time count, regarding the prevalence of homelessness in Minnesota. The plan references these limitations in various places, and the State will continue to seek the best available data sources for our work.

**Page 59**

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness. Of the 11,371 homeless adults, youth, and children counted in the Wilder 2018 Minnesota Homeless Study, at least 1674 adults and children were in unsheltered settings, including on the street or in places not meant for human habitation. **This data is 4 years old. HMIS data between 2016- 2021 indicate 92,000 people have experienced homelessness- again that is only counting those that got into the system.**

**Response:** The State recognizes the many limitations to nearly all data, including the Point in Time count, regarding the prevalence of homelessness in Minnesota. The plan references these limitations in various places, and the State will continue to seek the best available data sources for our work.

Discussion: Homelessness continues to be a persistent problem in the State of Minnesota, and as only worsened over the course of the COVID-19 pandemic. The expiration of eviction moratoriums will further intensify the risks of homelessness for low- and moderate-income households. Rising rent prices and overall cost of living will further strain household across all income levels, but households on fixed incomes and those already living near or at the poverty level (under 30% AMI) will be at greatest risk for housing instability.

**The unwillingness of our State to use \$12 Billion in abundant resources to ensure safe, decent, accessible housing that is affordable at people's income is the primary reason homelessness continues to increase in Minnesota.**

**Response:** We assume you are referring to the state's projected budget surplus for the current biennium. If so, allocation of state revenues is guided by a lengthy Legislative process and not within the scope of the Consolidated Planning process.

**Page 68**

**Please replace mobile home with manufactured home.**

**Response:** This is a HUD chart and not editable.

**Page 72**

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.- **Please add all the State funded programs and local funding resources. ESG may also be used to operate shelters**

**Response:** The description of ESG funding has been updated to more accurately reflect the uses of ESG in Minnesota.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts. **Please add number of NOAH units and newer apartments being converted into higher income units**

**Response:** There are an estimated 167,000 unsubsidized rental NOAH units in the metro area. This information has been added to the draft.

This demonstrates that the current housing stock does not meet the needs of the population, particularly lower income households. **MICAH agrees**

**Response:** Thank you for the comment.

#### **Page 79**

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 839,681 54% 360,377 59% Housing Units build before 1980 with children present 158,255 10% 116,095 19% Table 32 – Risk of Lead-Based Paint Data Source: 2013-2017 ACS (Total Units) 2013-2017 CHAS (Units with Children present) **At least 29% of units homeowners and rental contain lead paint and are endangering the brain development and potentially disabling our children for life. WE need to pass and implement Lead Safe Homes legislation**

Housing units built prior to 1980 may contain lead-based paint in portions of the home (window and door frames, walls, ceilings, etc.) or in some cases throughout the entire home. **Thus, it is generally accepted that these homes at least have a risk of lead-based paint hazards and should be tested in accordance with HUD standards- MICAH AGREES..** As indicated in the data above, throughout Minnesota, over 1,200,000 homes have an LBP Hazard. If an estimated sixty percent (40%) of these units are occupied by LMI families then there are over 480,000 with LBP Hazards. This increase in risk as the age of housing increases is exacerbated when that housing is not maintained or properly abated.

**Response:** Thank you for the comment.

#### **Page 83**

**MICAH's Comment: Permanent Supportive Housing Beds have grown tremendously over the last 2 decades with massive amounts of Federal and State funding and yet we continue to grow in numbers of people experiencing homelessness- On going funding for Permanent supportive housing should not come out of homeless funding- HEARTH Act amendment allows these HUD funded units to have renewal funds come from the Section 8/Housing Choice Vouchers program.**

**Response:** Minnesota Housing agrees about the needs for more supportive housing services funding and had a budget proposal last year to address the significant and unique funding needs for supportive housing development.

**Page 84**

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. **No info listed.**

**Response:** This has been addressed in the updated (final) Consolidated Plan publication.

Page 85

Housing Support Program

**Housing support program should charge no more than 30% of a person's income to participate in the program**

**Response:** This program policy is legislatively determined, and falls outside the scope of the Consolidated Plan process.

**Page 89**

Negative Effects of Public Policies on Affordable Housing and Residential Investment:  
**Lack of enforcement of Fair Housing Laws, Zoning codes, Local regulations increase cost of housing**

**Response:** We have updated the Consolidated Plan with additional information on actions taken and underway to address barrier to affordable housing.

**Page 91**

Educational Attainment by Age: **Is it possible to get breakout by race/ethnicity?**

**Response:** Updates have been made to the final Consolidated Plan.

**Page 92**

Educational Attainment – Median Earnings in the Past 12 Months: **No data on median income provided**

**Response:** Updates have been made to the final Consolidated Plan.

**Page 93**

Discussion: **Please discuss how Minnesota will use the \$40 Billion in US Department of Labor which will help fund apprenticeship jobs for people experiencing homelessness, people with disabilities and people leaving correctional facilities**

**Response:** This comment is outside the scope of the requirements for the Consolidated Plan.

**Page 94**

Are there any community assets in these areas/neighborhoods? Each area and community contain a variety of assets, which vary across the state. **This is a very limited response to reasons people live together in specific areas including social capital, family connectedness, intergenerational communities. Encourage you discuss a more extensive response to this section with Equity in Place and Community Stabilization Project**

**Response:** We agree with your comment that the community assets you identify are important, and as we point out, vary from community to community. We are committed to on-going dialogues with Equity in Place, Community Stabilization Project, and other organizations that are rooted in the communities they serve.

**Page 99**

The 2022-2026 Consolidated Plan has the following goals for the 5-year planning period. These goals will use HOME, ESG, HOPWA, NHTF and CDBG funds **Information provided are not measurable goals; they are general statements. There should be 5 year measurable goals with an annual plan to achieve those goals.**

**Response:** This is just an overview section. Five year goals and estimated outcomes are included in section SP-45 of the Consolidated Plan. The accompanying 2022 Annual Action Plan sets forth the funding allocations and outcomes associated with the Consolidated Plan goals for the coming year.

**Page 100**

SP-10 Geographic Priorities – 91.315(a)(1) Geographic Area - **Information incomplete**

**Response:** ESG section has been added in the updated (final) Consolidated Plan publication.

**Page 106**

The State is engaging in an update to its 2017 AI as part of this Consolidated Planning process. Meanwhile, for FY 22, the state continues to work on a series of actions associated with the AI developed in conjunction with the AI developed in 2017 and will report on these actions in the 2022 CAPER, as has been done in the CAPER's associated with the 2017-2021 Consolidated Plan. **Did the State update AI in 2020 or 2021?**

**Response:** The State did not update the AI in 2020 or 2021 but is currently working on an addendum.

**Page 109**

HOME: **Minnesota should utilize a portion for TBRA**

**Response:** While Minnesota Housing is not planning to use its HOME allocation for tenant-based rental assistance, we agree there is a significant need for more. Minnesota Housing requests additional rental assistance from the State Legislature in

the 2022 session and increase the federal Section 8/housing choice voucher program is part of the agency's federal policy agenda.

**Page 116**

The State does not have any plans for developing new institutional structures- **Why not? It should include people impacted by these issues as decision makers.**

**Response:** At this point in time, the State is not contemplating creating any new institutional structures; however, people facing homelessness and people experiencing housing instability are increasingly part of interagency and agency decision-making processes. One example is the Minnesota Interagency Council on Homelessness work on development a statewide strategic plan focused on achieving housing, racial and health justice for people experiencing homelessness.

**Page 117**

Goal Summary: Homeowner Housing Rehabilitated: 1500 Household Housing Units. Rental units constructed: 450 Household Housing Unit Rental units rehabilitated: 125 Household Housing Unit- **This does match the urgent need of rental housing for people at 30% of median income. Almost 3 times as many homeowner units than rental units**

**Response:** With resources that are not scaled to need, the State attempts to balance the full range of housing needs across income spectrum and housing type. Prioritizing rental housing development at the lowest incomes is a priority for Minnesota Housing.

**Page 118**

Homeless Person Overnight Shelter: 46,500 Persons Assisted- **We assume this is bed nights since this significantly exceeds the PIT info used earlier.**

**Response:** This is not bed-nights, but instead refers to a five-year goal for ESG, thus the higher number.

**Page 127**

Actions to address LBP hazards and increase access to housing without LBP hazards **Even, with these efforts, at least 700 children poisoned by Lead Paint each year- disproportionate number of diverse populations. State must require all properties built before 1980 be tested and if lead paint found be repainted every 5 years to encapsulate the paint until it can be abated.**

**Response:** Residential units that are pre-1978 are tested for lead-based paint hazards unless the unit meets an exception. The use of 1980 as the threshold is not currently required under Federal law and adjustments to state legislative policies is outside the scope of this Consolidated Plan.

**Page 128**

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families: **All public assistance programs should pay a livable income so individuals and families can afford housing**

**Response:** Levels of public assistance payments are determined by a lengthy legislative process, and they fall outside the scope of the Consolidated Plan process.

**Pages 136-137**

AP-20 Annual Goals and Objectives – 91.320(c)(3)&(e): **This does not match goals on pages 117-118.**

**Response:** The goals listed in Section SP-45 include the five year goals for the overall Consolidated Plan. Section AP-20 provides the annual goals for 2022. This is the outcomes that are expected to be achieved in 2022 toward the five year goals.

**Page 165**

The goal for the 2017 year, if no new resources will become available, is to continue to support these capacities at current levels. While emergency shelter is not a stand-alone solution to homelessness, shelter facilities fill a critical safety gap for families in many communities. This is particularly true during harsh Minnesota winters and in communities where extremely low vacancies or difficult rental markets result in many families exhausting all informal housing options during long episodes waiting for permanent housing : **Goals listed are 2017 goals.**

**Response:** This has been updated in the final Consolidated Plan publication.

**Page 171**

The State has found that the largest obstacle in meeting underserved needs is a lack of funding. **We agree**

**Response:** Thank you for the comment.

**Page 172**

Actions planned to reduce the number of poverty-level families. **Public assistance programs and jobs should pay a livable income so individuals and families can afford housing**

**Response:** Levels of public assistance payments are determined by a lengthy legislative process, and they fall outside the scope of the Consolidated Plan process.

**Page 174**

Recognizing the need to increase both the accessibility and effectiveness of assistance programs for low and very low-income people, Minnesota Housing has worked to increase the participation of local nonprofits and other nontraditional lenders in delivering its programs including those led by black, indigenous, or people of color. These nontraditional participants provide a greater opportunity to coordinate the delivery of assistance and to better target funds to people with the greatest need. **We support an expansion of this work and changing the phrase "nontraditional" to expansion of diverse lenders/participants.**

**Response:** Edits made to the final Consolidated Plan draft.

**7. Housing Justice Center - Margaret Kaplan**

**Minnesota's most urgent, and largely unaddressed, housing problem is provision of affordable housing for renter households with income not exceeding 30% of AMI**

The way the proposed comprehensive plan displays Housing Cost Burden needs at NA-25 obscures the magnitude of this problem, as it fails to separate address renter and homeowner households and to address cost burdens by income level. Attached is the HUD CHAS table for the state for 2013-2017<sup>1</sup> downloaded from: [https://www.huduser.gov/portal/datasets/cp.html#2006-2018\\_data](https://www.huduser.gov/portal/datasets/cp.html#2006-2018_data).<sup>2</sup> The second to the last table lays out Cost Burden by Income. It shows 130,085 households paying more than half their income for housing. (Table NA-25 addresses homeowners and renters together.) Of these, 100,125, or 77% have incomes at or below 30% of AMI.

Unfortunately, most of the available resources for affordable housing are not being used to create additional housing opportunities for people at or below 30% AMI where the need is the greatest. Attached is a table from the MHFA's 2022-2023 Affordable Housing Plan, which shows a substantial share (41% in 2020) of new rental units produced with these resources affordable at or below 30% of AMI. However, most of these units are produced by shifting the utilization of already existing rental assistance. In 2020, for example, only 5%, or 71 units were produced without this assistance. The concern is that project-basing section 8 vouchers or other rental assistance does nothing to increase the total supply of deeply affordable housing; it simply moves around already existing resources. There is no indication anywhere in the proposed Consolidated Plan that recognizes, or indicates an intent to address, this misallocation of affordable housing resources.

**The proposed Consolidate Plan misses multiple opportunities or requirements to address this issue.**

The regulations at 24 C.F.R. § 91.310(d) requires an explanation of whether incentives to develop affordable housing in the state are affected by state policies. The miniscule discussion of this critical issue is at page 88 of the proposed plan. The discussion fails to address **any** barriers to affordable housing created by **any** public policies. It certainly fails to discuss the multiple MHFA policies related to allocation of resources in the agency's Consolidated RFP which result in almost no units produced to address the biggest and most serious rental housing problems in the state. The proposed Consolidated Plan thus fails to comply with the requirements of 24 C.F.R. § 91.310(d).

Similarly, 24 C.F.R. § 91.315(h) requires the Plan to describe the state's strategy to remove or ameliorate negative effects of the state's own policies that serve as barriers to affordable housing. The Plan's discussion at SP-55 wholly fails to comply with this requirement. There is some minimal discussion of NIMBYism and prejudice, but no discussion at all of what is required by the regulation: the state's own policies which serve as barriers. Again, what is minimally required here is a discussion of MHFA policies which fail to direct scarce public resources to what is obviously the state's most urgent housing need. Again, the proposed Consolidated Plan thus fails to comply with the requirements of 24 C.F.R. § 91.315(h). Additionally, 24 C.F.R. § 91.315(m) requires the Plan to describe the strategy to coordinate low-income housing tax credits (LIHTC) with affordable housing development. There is

nothing in the draft Plan addressing the requirements of this section of the regulations. Also missing anywhere in the document is any discussion of the critical need to direct low-income housing tax credits to producing units which add to the supply of housing affordable at or below 30% of AMI. The proposed Plan fails to comply with regulatory requirements until a section responsive to § 91.315(m) is added and addresses this issue.

Finally, 24 C.F.R. § 91.320(i) requires a discussion of actions the state plans to take to remove or ameliorate negative effects of public policies that are barriers to affordable housing. Again, discussion of the MHFA's own policies which serve as barriers is wholly lacking and the Plan fails to meet the requirements of the Consolidated Plan regulations.

**Response:** We appreciate the comments. Minnesota Housing has proposed several policy and budget items to address the significant housing needs and barriers identified in the Consolidated Plan. While legislative proposals change from year to year these examples are meant to demonstrate the agency's commitment to propose state legislative solutions to address existing barriers to affordable housing. The Consolidated Plan has been updated to reflect a few recent examples of proposals that involve Minnesota Housing's programs as well as other state laws that create barriers or impediments to affordable housing.

**Item:** HomeHelpMN COVID-19 Homeownership Assistance Fund Program Changes

**Staff Contact(s):**

Vanessa Haight, 651.297.3624, [vanessa.haight@state.mn.us](mailto:vanessa.haight@state.mn.us)

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**Request Type:**

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> Approval | <input type="checkbox"/> No Action Needed |
| <input checked="" type="checkbox"/> Motion   | <input type="checkbox"/> Discussion       |
| <input type="checkbox"/> Resolution          | <input type="checkbox"/> Information      |

**Summary of Request:**

Increase the HomeHelpMN maximum award amount from \$35,000 to \$50,000 and allow arrearages incurred prior to 1/21/2020 to be paid when a homeowner has experienced a COVID-19 related hardship as allowed by the U.S. Department of Treasury guidance.

**Fiscal Impact:**

The statewide program is funded by \$128.6 million of federal funds allocated directly to the agency.

**Meeting Agency Priorities:**

- Improve the Housing System
- Preserve and Create Housing Opportunities
- Make Homeownership More Accessible
- Support People Needing Services
- Strengthen Communities

**Attachment(s):**

- Background
- HomeHelpMN Term Sheet

## **Background**

Minnesota Housing's Board approved the State's Homeownership Assistance Fund (HAF) Plan on August 26, 2021, which was approved by the U.S. Department of the Treasury on January 13, 2022. An amendment to the plan was approved by the board on April 21, 2022, and by the Treasury on June 15, 2022.

The HomeHelpMN program was initially open for applications for 30 days when it launched on May 17, 2022. The pace of applications has been slower than anticipated, and the application period was extended until August 17, and on August 4, we announced the application deadline would be lifted. Applications will be taken until available funding is committed, at which time applications may be put on a waitlist.

Since the pace of applications is slower than expected, staff evaluated program requirements to identify changes that could expand program availability within Treasury guidelines. Increasing the maximum grant amount and allowing past eligible arrearages to be paid with HomeHelpMN funds will allow more homeowners to sustain homeownership. Homeowners that were struggling prior to the pandemic and were impacted by COVID-19 may be able to fully resolve their delinquency with these changes. By increasing the maximum assistance from the current \$35,000 and allowing arrearages incurred prior to January 21, 2020, staff estimates approximately 1,000 additional households may become eligible who would have previously been denied or not applied based on current guidelines.

## Property Charge Default Resolution Term Sheet

| <u>Criteria</u>                                   | <u>Terms</u>   |
|---|--|
| <b>Brief description</b>                          | <p>Provide funds to resolve property charge defaults that threaten a homeowner’s ability to sustain ownership of the property, whether concurrently with other loss mitigation options offered by the loan servicer or in conjunction with other assistance programs.</p> <p>HAF Funds may be used to pay past due property taxes, insurance premiums, homeowners’ association (HOA) fees, condominium fees, cooperative maintenance or common charges that threaten sustained ownership of the property. Must be brought current by program assistance or resolved concurrently with the program providing assistance.</p> <p>Funds may also be used to pay certain property charges coming due, in general up to 30 days, but we may allow up to 90 days on an exception basis following approval.</p> |
| <b>Maximum amount of assistance per homeowner</b> | <p>Each Homeowner will be eligible for up to \$50,000 across HomeHelpMN programs to be used only for the homeowner’s primary residence. Assistance is generally limited to one-time, per household. Households who experience a second Qualifying Financial Hardship may be eligible on an exception basis for a second time provided the total maximum per household/property assistance does not exceed \$50,000. Minnesota Housing will permit exceptions to the \$50,000 assistance limit based on need.</p>   |

| <u>Criteria</u>   | <u>Terms</u>   |
|---|--|
| <p><b>Homeowner eligibility criteria and documentation requirements</b></p> | <p>Must meet HomeHelpMN program requirements plus:</p> <p>Homeowner is at least one installment payment in arrears on one or more property charges including:</p> <ul style="list-style-type: none"> <li>• Property taxes</li> <li>• Insurance: hazard, flood, wind premiums</li> <li>• HOA fees, condominium fees,</li> <li>• Cooperative maintenance or common charges</li> <li>• Manufactured home lot rent for manufactured homes when permanently affixed to real property and taxed as real estate, or for manufactured home lot rent if not permanently affixed to real property when located on leased land</li> </ul> <p>Documentation requirements:</p> <ul style="list-style-type: none"> <li>• Statement showing past due amount for each property charge</li> </ul> |
| <p><b>Loan eligibility criteria specific to the program</b></p>             | <p>N/A</p>   |
| <p><b>Form of assistance</b></p>  | <p>Assistance will be structured as direct assistance payment provided on behalf of the homeowner without a repayment obligation.</p>  |

|                             |   |
|-----------------------------|---|
| <b>Payment requirements</b> | Funds will be paid, as applicable, to the mortgage servicer or other third-party payee authorized by the servicer, or other third party authorized to collect eligible charges in accordance with reinstatement instructions received from the payee. |
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## Mortgage Reinstatement Program Term Sheet

| <u>Criteria</u>                                   | <u>Terms</u>  |
|---|---|
| <b>Brief description</b>                          | <p>Provide funds to eliminate past due payments and other delinquent amounts, including payments under a forbearance plan, on forward mortgages, reverse mortgages, loans secured by manufactured homes, or contracts for deed.</p> <p>HAF Funds may be used to bring the account fully current, according to Minnesota Housing’s program guidelines, with no remaining delinquent amounts, and to repay amounts advanced by the lender or servicer on the borrower’s behalf for property charges, including property taxes, hazard insurance premiums, mortgage insurance premiums, flood or wind insurance premiums, ground rents, condominium fees, cooperative maintenance fees, planned unit development fees, or homeowners’ association fees that the servicer advanced to protect lien position. Payment may also include any reasonably required legal fees.</p> |
| <b>Maximum amount of assistance per homeowner</b> | <p>Each Homeowner will be eligible for up to \$50,000 across HomeHelpMN programs to be used only for the homeowner’s primary residence. Assistance is generally limited to one-time, per household. Households who experience a second Qualifying Financial Hardship may be eligible on an exception basis for a second time provided the total maximum per household/property assistance does not exceed \$50,000. Minnesota Housing will permit exceptions to the \$50,000 assistance limit based on need.</p>  |

| <u>Criteria</u>  | <u>Terms</u>  |
|--|---|
| <b>Homeowner eligibility criteria and documentation requirements</b> | Documentation requirements: <sup>1</sup> <ul style="list-style-type: none"> <li>• Statement from servicer or lender showing past due amount and amount required to reinstate the mortgage</li> </ul>  |
| <b>Loan eligibility criteria specific to the program</b>             | Delinquent by at least one payment, including any payments during a forbearance period.   |
| <b>Form of assistance</b>  | Assistance will be structured as direct assistance payment provided on behalf of the homeowner without a repayment obligation.  |
| <b>Payment requirements</b>  | Funds will be paid, as applicable, to the mortgage servicer or other third-party payee authorized by the servicer, or other third party authorized to collect eligible charges in accordance with reinstatement instructions received from the payee. |

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<sup>1</sup> Other program documentation requirements to meet overall program eligibility will be required.