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CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

As designed by the U.S. Department of Housing and Urban Development (HUD), this report primarily pertains to those programs funded through federal assistance allocated to Minnesota state agencies under Community Development Block Grants (CDBG), Emergency Solutions Grants (ESG), HOME Investment Partnership (HOME), the National Housing Trust Fund (NHTF), and Housing Opportunities for Persons with AIDS (HOPWA). The state makes this report available on behalf of the Minnesota Department of Employment and Economic Development (DEED), the Minnesota Department of Human Services (DHS), and Minnesota Housing Finance Agency (Minnesota Housing).

It is important to note that the state provides affordable housing and community development through a variety of programs, many of which are funded through agency resources or state appropriations. In Federal Fiscal Year (FFY) 2020, Minnesota Housing alone committed funds to assist nearly 41,000 households with rent assistance, down payment and first mortgage financing, home improvement financing, homebuyer education, the rehabilitation or construction of affordable rental housing, and other assistance (not including 30,000 units of Section 8 housing for which Minnesota Housing administers the housing assistance contract). Additional information about other housing and community development may be obtained through Minnesota Housing, DEED and DHS.

The state has identified objectives and expected outcomes for federally funded housing and community development assistance through a process of public hearings and forums held throughout the state. Housing advocates, service providers, residents, and other stakeholders are invited to participate in these events and to provide input on local needs, priorities, and problems (see the citizen participation plan and public comments attached to the Consolidated Housing and Community Development Plan, FY 2017-2021). The Annual Action Plan addresses how objectives are to be met each year. Under most federal programs covered in this report, the state has been close to meeting its previous annual projections. The economy has worsened this year due to the impact of the pandemic and unemployment has increased from 3.2 percent in September of 2019 to 7.4 percent in September 2020. Nationally unemployment was 7.9% in September 2020.

As of the end of 2020, the fourth year in its five-year plan (2017-2021), Minnesota had achieved 93% of its five-year goals.

DEED's Small Cities Development Program had challenges in matching the goals set in the annual action plan. Commercial projects have 41 accomplishments compared to the expected goal of 85. Owner occupied housing rehabilitation projects have 214 accomplishments compared to the expected goal of 350. Rental housing rehabilitation projects have 114 accomplishments compared to the expected goal of 150. Not meeting the goal is due to several factors, mainly the COVID-19 pandemic. Grantees were experiencing difficulties with construction stalled, short construction season, difficulty in obtaining lead certified contractors and the cost of material skyrocketing. Landlords expressed some reluctance to participate in the program given the rent levels and challenges related to the rental market due to the pandemic. The unit of measure for Public facilities projects is based on persons assisted for both Low and Moderate Income (LMI) and other than LMI. Public facility projects have exceeded the goal of 1,240 assisted persons with a total accomplishments of 9,258 assisted persons, consisting of 5,073 LMI persons and 4,185 other than LMI persons. A streetscape project with a slum and blight national...
objective was part of the public facility projects. DEED's Minnesota Investment Fund (MIF) projected zero for LMI jobs and with zero accomplishments. Due to elevated funding levels from other state funded sources, federal resources have not been used, hence with the authority of the DEED Commissioner, these funds have been reallocated to the Small Cities Development Program.

It is important to note for budgeting and planning purposes that Minnesota Housing projects the number of units for which it expects to make funding commitments; projecting the completion of HOME-assisted units is difficult because multifamily projects may take a few years to complete.
Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee’s program year goals.

<table>
<thead>
<tr>
<th>Goal</th>
<th>Category</th>
<th>Source / Amount made Available</th>
<th>Indicator</th>
<th>Unit of Measure</th>
<th>Expected Program Year 2020</th>
<th>Actual Program Year 2020</th>
<th>Percent Complete</th>
</tr>
</thead>
<tbody>
<tr>
<td>Create suitable living environment - DEED</td>
<td>Affordable Housing</td>
<td>CDBG: $10,200,320</td>
<td>Rental units rehabilitated</td>
<td>Household Housing Unit</td>
<td>150</td>
<td>114</td>
<td>76%</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Homeowner housing rehabilitated</td>
<td>Household Housing Unit</td>
<td>350</td>
<td>214</td>
<td>60%</td>
</tr>
<tr>
<td>Enhance Affordable Housing Opportunities- Minnesota Housing</td>
<td>Affordable Housing</td>
<td>HOME: $9,393,719 NHTF: $4,078,002</td>
<td>Rental units rehabilitated</td>
<td>Household Housing Unit</td>
<td>45</td>
<td>24</td>
<td>53%</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Rental housing constructed</td>
<td>Household Housing Unit</td>
<td>45</td>
<td>0</td>
<td>0%</td>
</tr>
<tr>
<td>Promote Economic Development</td>
<td>Non-Housing Community Development</td>
<td>CDBG: $3,652,000</td>
<td>Façade treatment/business building rehabilitation</td>
<td>Business</td>
<td>85</td>
<td>41</td>
<td>48%</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Jobs created/retained</td>
<td>Jobs</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Businesses Assisted</td>
<td>Businesses Assisted</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Facilitate Housing and Service for the Homeless</td>
<td>Homeless</td>
<td>ESG: $2,201,143</td>
<td>Tenant-based rental assistance/ rapid rehousing</td>
<td>Households Assisted</td>
<td>300</td>
<td>150</td>
<td>49%</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Homeless person Overnight Shelter</td>
<td>Persons Assisted</td>
<td>9300</td>
<td>9840</td>
<td>102%</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Homelessness Prevention</td>
<td>Persons Assisted</td>
<td>150</td>
<td>112</td>
<td>75%</td>
</tr>
<tr>
<td>Provide Funds for Special-Needs Housing and Services</td>
<td>Non-Homeless Special Needs</td>
<td>HOPWA: $252,520</td>
<td>Homelessness Prevention</td>
<td>Persons Assisted</td>
<td>200</td>
<td>177</td>
<td>89%</td>
</tr>
<tr>
<td>Address Public Facility and Infrastructure Needs- DEED</td>
<td>Non-Housing Community Development</td>
<td>CDBG: $2,905,000</td>
<td>Public Facility or Infrastructure Activities other than Low/Moderate Income Housing</td>
<td>Persons Assisted</td>
<td>490</td>
<td>4185</td>
<td>941%</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Public Facility or Infrastructure Activities for Low/Moderate Income Housing</td>
<td>Persons Assisted</td>
<td>750</td>
<td>5073</td>
<td>620%</td>
</tr>
</tbody>
</table>

Table 1 - Accomplishments – Program Year & Strategic Plan to Date

Minnesota Consolidated Annual Performance and Evaluation Report for FFY 2020
Assess how the jurisdiction’s use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

Minnesota’s objectives in the distribution of housing and community development resources are to create suitable living environments; provide decent, affordable housing; and create economic opportunities within the state. In working to achieve those objectives, the state has prioritized populations with the greatest need for assistance (see SP-25 “Priority Needs” in the 2017-2021 Consolidated Plan for Housing and Community Development).

Priorities include renters with incomes at or below 30% of area median income (AMI), homeowners with incomes of 51% to 80% of AMI, and non-homeless people with special needs. NHTF and HOME-funded units, in particular, reflect these priorities—For HOME units, 67% of renter households occupying units completed in FFY 2020 had incomes below 30% of AMI. 100% of units for NHTF had incomes below 30% of AMI.

In addition to general affordable housing, Minnesota Housing assists the homeless or people with special needs at risk of being homeless who struggle with housing stability through several programs funded by the state legislature, including the Family Homeless Prevention and Assistance Program, Bridges rental assistance, the state Housing Trust Fund rent assistance, and Housing Infrastructure Bonds. These programs assisted more than 8,200 households in 2020.

With its federal resources, the state assists the greatest number of people through the Emergency Solutions Grant (ESG). ESG assistance includes operating and supportive service costs for emergency shelter facilities and rental assistance and housing relocation and stabilization services for homeless persons and those at imminent risk of homelessness who need to be re-housed.

CR-10 - Racial and Ethnic composition of families assisted
Describe the families assisted (including the racial and ethnic status of families assisted).
91.520(a)

<table>
<thead>
<tr>
<th></th>
<th>CDBG</th>
<th>HOME</th>
<th>ESG</th>
<th>HOPWA</th>
<th>NHTF</th>
</tr>
</thead>
<tbody>
<tr>
<td>White</td>
<td>1005</td>
<td>9</td>
<td>4566</td>
<td>102</td>
<td></td>
</tr>
<tr>
<td>Black or African American</td>
<td>15</td>
<td>12</td>
<td>3209</td>
<td>60</td>
<td></td>
</tr>
<tr>
<td>Asian</td>
<td>8</td>
<td>0</td>
<td>146</td>
<td>3</td>
<td></td>
</tr>
<tr>
<td>American Indian or American Native</td>
<td>9</td>
<td>0</td>
<td>1329</td>
<td>4</td>
<td></td>
</tr>
<tr>
<td>Native Hawaiian or Other Pacific Islander</td>
<td>2</td>
<td>0</td>
<td>45</td>
<td></td>
<td></td>
</tr>
<tr>
<td>More than one race</td>
<td>10</td>
<td>3</td>
<td>745</td>
<td>8</td>
<td></td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>1036</td>
<td>24</td>
<td>9295</td>
<td>177</td>
<td>164</td>
</tr>
<tr>
<td>Hispanic</td>
<td>35</td>
<td>1</td>
<td>832</td>
<td>13</td>
<td></td>
</tr>
<tr>
<td>Not Hispanic</td>
<td>1014</td>
<td>23</td>
<td>9270</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Table 2 – Table of assistance to racial and ethnic populations by source of funds

Narrative

According to the Census Bureau’s estimates in the *American Community Survey, 2019*, low and moderate income households (those earning less than $50,000 in 2018) of a race other than white comprise an estimated 19% of the households in Minnesota, and households of Hispanic or Latino ethnicity comprise an estimated 5% of the households in Minnesota.

CDBG assisted 1,049 households in FFY 2020. Of that number, 1005 were white, 15 Black/African American, 8 Asian, 9 American Indian/Alaskan Native, 2 Native Hawaiian/Other Pacific Islander, 1 American Indian/Alaskan Native & white, 2 Asian/White and 7 other multi-racial. Among CDBG-assisted households, 96% of households were white, 1% Black/African American, less than 1% American Indian/Alaskan Native, less than 1% Native Hawaiian/Other Pacific Islander, and less than 1% multi-racial. Households with two or more races do not fit into the CAPER table above.

As summarized in the IDIS Report *HOME Summary of Accomplishments for FFY 2020* 38% of HOME-assisted households were white, 50% Black/African American, 0% Asian, 0% American Indian/Alaskan Native, and 13% more than one race. Of the total HOME-assisted households, 0% of households were Hispanic.

Note that HOME funds historically were available primarily in non-entitlement areas, which are less diverse and may have limited previous opportunity for HOME-funded projects to serve a higher percentage of people of color or Hispanic ethnicity.

With ESG funding, DHS assisted 10,102 households during Program Year 2020. Of those, 45% identified as White, 32% identify as Black/African American, 14% identify as American Indian or Alaskan Native, and approximately 27% identify as more than one race. Ninety-two percent of persons in ESG-funded programs identified as Non-Hispanic ethnicity.

DEED, Minnesota Housing, and DHS’s current *Analysis of Impediments to Fair Housing Choice* report and action plan corresponds with the final three years of the Consolidated Plan. A full disclosure of the
impediments can be found in the *2019 Analysis of Impediments to Fair Housing Choice for Minnesota* available at: [Analysis of Impediments to Fair Housing Choice](#)

Each year, the state documents agency actions taken to overcome impediments (see CR 35 of this report).

**CR-15 - Resources and Investments 91.520(a)**

*Identify the resources made available*

<table>
<thead>
<tr>
<th>Source of Funds</th>
<th>Resources Made Available</th>
<th>Amount Expended During Program Year</th>
</tr>
</thead>
<tbody>
<tr>
<td>CDBG</td>
<td>26,058,420</td>
<td>5,787,955</td>
</tr>
<tr>
<td>HOME</td>
<td>9,393,719</td>
<td>2,678,978</td>
</tr>
<tr>
<td>HOPWA</td>
<td>252,520</td>
<td>194,953</td>
</tr>
<tr>
<td>ESG</td>
<td>2,201,143</td>
<td>2,201,143</td>
</tr>
<tr>
<td>NHTF</td>
<td>4,078,002</td>
<td>0</td>
</tr>
</tbody>
</table>

*Table 3 – Resources Made Available*

**Narrative**

Funding provided by HUD to Minnesota for FFY 2020 under housing and community development programs is shown above. The expended amounts during a program year could be higher or lower than resources made available due to timing of projects, particularly capital funding for projects via CDBG, HOME and NHTF. For example, this year both the HOME and NHTF programs funded new construction multifamily rental projects that often take two years to complete, reflected with limited expenditures during the first year of a project. Note that amounts expended may include funds from previous allocations.

State agencies provide a large amount of assistance other than federal funds for affordable housing. For example, in FFY 2020, Minnesota Housing committed loans/grants for approximately $1.8 billion in housing assistance to non-Section 8 households. Minnesota Housing resources include bond sale proceeds and other mortgage capital, federal housing tax credits, state appropriations, and its own resources. (These figures from the agency’s most recent reporting are shown for context and differ from expenditures shown in IDIS because Minnesota Housing reports on loans/grants committed for funding while IDIS includes funds for projects that are completed and occupied in the reporting year.)

In addition, HUD awarded funding to Minnesota ($3.1 million in 2013 and $3 million in 2015) for the Section 811 demonstration that Minnesota Housing and DHS currently are implementing. Under this demonstration, Minnesota Housing provides rent assistance on behalf of households with a disabled member.
Identify the geographic distribution and location of investments

<table>
<thead>
<tr>
<th>Target Area</th>
<th>Planned Percentage of Allocation</th>
<th>Actual Percentage of Allocation</th>
<th>Narrative Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Non-Entitlement</td>
<td>100</td>
<td>100</td>
<td>Funding Distribution for CDBG Small Cities program</td>
</tr>
<tr>
<td>Statewide</td>
<td>100</td>
<td>100</td>
<td>ESG, HOME and NHTF are available statewide</td>
</tr>
</tbody>
</table>

Table 4 – Identify the geographic distribution and location of investments
2020 AWARDED PROJECTS SMALL CITIES DEVELOPMENT PROGRAM

AWARD DATE: MAY 11, 2020

The funds for the grantee’s will be used for the following:

Askov, $600,000 Public facility improvements
Bemidji, $388,125 Owner occupied housing
Florence, $585,000 Public facility improvements
Goodhue/Dennison, $528,420 Owner occupied housing
Greenbush, $1,108,000 Owner occupied housing, rental housing, commercial and Streetscape improvements
Jasper/Magnolia, $599,991 Owner Occupied housing
Lake Lillian, $600,000 Public facility improvements
Murdock, $600,000 Public facility improvements
Ogilvie, $600,000 Public facility improvements
Springfield, $531,300 Owner Occupied housing
Wabasha, $528,420 Owner Occupied housing
Waterville, $287,500 Owner Occupied housing

2020 AWARDED PROJECTS SMALL CITIES DEVELOPMENT PROGRAM

AWARD DATE: JUNE 8, 2020

The funds for the grantee’s will be used for the following:

Annandale, $485,356 Rental housing and commercial
Appleton, $747,500 Owner occupied housing and commercial
Argyle, $759,000 Owner occupied housing, rental housing and commercial
Battle Lake, $943,000 Owner occupied housing and commercial
Belle Paine, $603,750 Owner occupied housing and commercial
Blue Earth, $317,400 Owner occupied housing
Clara City, $701,500 Owner occupied housing, rental housing and commercial
Fairmont, $885,500 Owner occupied housing and commercial
Hinckley, $437,000 Rental housing and commercial
Lamberton, $782,000 Owner occupied housing and commercial
Mapleton, $345,000 Owner occupied housing
McIntosh, $394,450 Rental housing
Mille Lacs County, $391,000 Rental housing and commercial
Mora, $393,300 Owner occupied housing and rental housing
Redwood Falls, $864,800 Owner occupied housing and commercial
Roseau, $625,600 Owner occupied housing and commercial
St. Charles, $ 599,955 Owner occupied housing and rental housing
Trimont, $ 431,250 Owner occupied housing
Underwood, $488,750 Owner occupied housing
Wadena, $681,720 Owner occupied housing, rental housing and commercial

**Narrative**

The largest percentage of assistance that the state provided with federal resources is through CDBG, particularly for the rehabilitation of residential homes, commercial and the improvements on public facilities. In 2020, 26% of the distribution of funds were for publicly or privately owned commercial buildings, 50% for housing which included owner occupied housing projects and rental housing, 12% for public facility and improvements, 12% for general administration, and 0.5% for technical assistance. A map showing the distribution of projects awarded funding in 2020 is attached in IDIS.

Listed below are outreach and training sessions (both in-person and virtual) conducted during this fiscal year.

- October 2019 - House Mini Session - Community and Economic Development Discussion
- October 2019 - Rural Water Presentation (Public facility with RD and PFA)
- November 2019 - IRRRB Presentation (SCDP)
- January 2020 - Roundtable SCDP Discussion in St. Peter and Cloquet
- February 2020 - Roundtable SCDP Discussion in Brainerd
- July 2020 - Virtual SCDP Presentation - Renville County EDA
- July 2020 - SCDP Implementation and Application Webinar
- October 2020 - Public Facility Roundtable with PFA, RD, MDH and MPCA

HOME funds are available statewide. In 2020, 100% of completed HOME-funded units were in projects located in the seven-county Twin Cities metro.

Minnesota targets HOPWA funds to areas outside the 13-county Twin Cities metropolitan area, which is served by the City of Minneapolis HOPWA grant.

ESG Shelter resources are distributed statewide, with priority given for non-entitlement areas, and secondly to entitlement areas which have used their full ESG allocation for emergency shelter operations and have additional need for emergency shelter resources. For ESG Prevention and Rapid Re-Housing funding, funds are only awarded to applications from non-ESG entitlement areas of the state, resulting in all ESG Housing funds being expended in these Balance of State areas.

**Leveraging**
Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

ESG requires a one-to-one matching of funds. The State and its ESG sub-recipients expended $2,101,143 in non-ESG funds which were provided by federal, state, local and private sources as match for ESG-eligible activities. All matching funds came from the State Emergency Service Program (ESP) appropriation to fund emergency shelter across the state.

DEED leverages its CDBG housing rehabilitation funds with Minnesota Housing, USDA Rural Development, lender, and property owner contributions. Each applicant jurisdiction is expected to provide as much local money as practicable, contingent upon the financial capability of the applicant. DEED, the Public Facility Authority, and Rural Development coordinate funds for correcting or improving public infrastructure, especially for low- and moderate-income communities. DEED staff estimates that CDBG projects historically have leveraged nonfederal funds in an amount at least equal to CDBG funds.

In 2020, of those projects receiving HOME funds, HOME dollars comprised 17% of total funds committed to those projects.

HOME requires that each participating jurisdiction make contributions to housing that qualifies as affordable housing under the HOME program. These contributions must total not less than 25 percent of the funds drawn from the jurisdiction’s HOME Investment Trust Fund Treasury account. Minnesota Housing satisfies this requirement through investments in two rental assistance programs funded by the Minnesota State Legislature as detailed in Table 6 – Match Contribution for the Federal Fiscal Year:

1) The State Housing Trust Fund provides rental assistance to high priority homeless families and individuals, defined as households prioritize for permanent supportive housing by the Coordinated Entry System.

2) The Bridges program provides assistance to households in which one or more adult members has a serious mental illness. This program helps people with disabilities live in a more community-based and integrated setting while receiving services.

Minnesota Housing allocates Low-Income Housing Tax Credits for the development of affordable rental housing, often in conjunction with agency-financed first mortgages and/or other contributions, such as deferred or gap funding including HOME and NHTF. In 2020, Minnesota Housing closed $37.6 million in loans and gap funding for developments with 295 tax credit units that also received nearly $47.3 million in syndication proceeds from investors.

A scoring criterion used to evaluate projects with respect to competitive HOME fund awards is efficient use of scarce resources and leverage. It includes measurements related to readiness to proceed by evaluating the percentage of the development’s funding that is secured/committed, in addition to a scoring measurement for other non-capital contributions, and low intermediary costs.
<table>
<thead>
<tr>
<th>Fiscal Year Summary – HOME Match</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Excess match from prior Federal fiscal year</td>
<td>152,118,365</td>
</tr>
<tr>
<td>2. Match contributed during current Federal fiscal year</td>
<td>13,327,985</td>
</tr>
<tr>
<td>3. Total match available for current Federal fiscal year (Line 1 plus Line 2)</td>
<td>165,446,350</td>
</tr>
<tr>
<td>4. Match liability for current Federal fiscal year</td>
<td>807,567</td>
</tr>
<tr>
<td>5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)</td>
<td>164,638,783</td>
</tr>
</tbody>
</table>

Table 5 – Fiscal Year Summary - HOME Match Report
### Match Contribution for the Federal Fiscal Year

<table>
<thead>
<tr>
<th>Project No. or Other ID</th>
<th>Date of Contribution</th>
<th>Cash (non-Federal sources)</th>
<th>Foregone Taxes, Fees, Charges</th>
<th>Appraised Land/Real Property</th>
<th>Required Infrastructure</th>
<th>Site Preparation, Construction Materials, Donated labor</th>
<th>Bond Financing</th>
<th>Total Match</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>09/30/2020</td>
<td>$9,717,875</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>$9,717,875</td>
</tr>
<tr>
<td>2</td>
<td>09/30/2020</td>
<td>$3,610,110</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>$3,610,110</td>
</tr>
</tbody>
</table>

Table 6 – Match Contribution for the Federal Fiscal Year

### HOME MBE/WBE report

<table>
<thead>
<tr>
<th>Program Income</th>
<th>– Enter the program amounts for the reporting period</th>
</tr>
</thead>
<tbody>
<tr>
<td>Balance on hand at beginning of reporting period</td>
<td>Amount received during reporting period</td>
</tr>
<tr>
<td>6,756,679</td>
<td>2,038,024</td>
</tr>
</tbody>
</table>

Table 7 – Program Income
### Minority Business Enterprises and Women Business Enterprises

- **Indicate the number and dollar value of contracts for HOME projects completed during the reporting period**

<table>
<thead>
<tr>
<th>Total</th>
<th>Minority Business Enterprises</th>
<th>White Non-Hispanic</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Total</td>
<td>Alaskan Native or American Indian</td>
</tr>
<tr>
<td>Dollar Amount</td>
<td>$6,859,842</td>
<td>0</td>
</tr>
<tr>
<td>Number</td>
<td>4</td>
<td>0</td>
</tr>
</tbody>
</table>

#### Sub-Contracts

<table>
<thead>
<tr>
<th>Total</th>
<th>Women Business Enterprises</th>
<th>Male</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dollar Amount</td>
<td>$17,967,226</td>
<td>$233,942</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Total</th>
<th>Minority Property Owners</th>
<th>White Non-Hispanic</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Total</td>
<td>Alaskan Native or American Indian</td>
</tr>
<tr>
<td>Number</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Dollar Amount</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

### Minority Owners of Rental Property

- **Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted**

<table>
<thead>
<tr>
<th>Total</th>
<th>Minority Property Owners</th>
<th>White Non-Hispanic</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Total</td>
<td>Alaskan Native or American Indian</td>
</tr>
<tr>
<td>Number</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Dollar Amount</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

### Relocation and Real Property Acquisition

- **Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition**

| Parcels Acquired | 0 | 0 |

---

Minnesota Consolidated Annual Performance and Evaluation Report for FFY 2020
<table>
<thead>
<tr>
<th>Businesses Displaced</th>
<th>0</th>
<th>0</th>
</tr>
</thead>
<tbody>
<tr>
<td>Nonprofit Organizations Displaced</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Households Temporarily Relocated, not Displaced</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Households Displaced</th>
<th>Total</th>
<th>Minority Property Enterprises</th>
<th>White Non-Hispanic</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Alaskan Native or American Indian</td>
<td>Asian or Pacific Islander</td>
</tr>
<tr>
<td>Number</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Cost</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

*Table 10 – Relocation and Real Property Acquisition*
CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

<table>
<thead>
<tr>
<th></th>
<th>One-Year Goal</th>
<th>Actual</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of Homeless households to be provided affordable housing units</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Number of Non-Homeless households to be provided affordable housing units</td>
<td>590</td>
<td>352</td>
</tr>
<tr>
<td>Number of Special-Needs households to be provided affordable housing units</td>
<td>200</td>
<td>177</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>790</strong></td>
<td><strong>529</strong></td>
</tr>
</tbody>
</table>

Table 11 – Number of Households

<table>
<thead>
<tr>
<th></th>
<th>One-Year Goal</th>
<th>Actual</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of households supported through Rental Assistance</td>
<td>300</td>
<td>150</td>
</tr>
<tr>
<td>Number of households supported through the Production of New Units</td>
<td>45</td>
<td>0</td>
</tr>
<tr>
<td>Number of households supported through Rehab of Existing Units</td>
<td>545</td>
<td>352</td>
</tr>
<tr>
<td>Number of households supported through Acquisition of Existing Units</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>890</strong></td>
<td><strong>502</strong></td>
</tr>
</tbody>
</table>

Table 12 – Number of Households Supported

Discuss the difference between goals and outcomes and problems encountered in meeting these goals.

The one-year goal of 590 units (Table 11), set out in the state’s 2020 Action Plan, was stated as the goal for rehabilitated and newly constructed rental units funded through HOME, NHTF, or CDBG.

We anticipate variation in funding new construction versus rehabilitation in HOME and NHTF, and while the plan evenly splits the activities (45 units for each new construction and rehabilitation, as cited in Table 1), activities year to year will not reflect an even split depending on market need, and applications received by Minnesota Housing.

For Emergency Solutions Grant (ESG) funding, the goal of providing rapid re-housing assistance 300 households (Table 12) was not achieved. During the program year, ESG providers assisted 150 household with rapid re-housing assistance. The goal of serving 150 persons with homelessness prevention was only partially achieved as well, with 112 persons receiving assistance during the program year. In both instances, a variety of factors to contributed to the number of persons served, including longer lengths of stay in the program and difficulty accessing employment and stable housing as a result.
of the rapid economic downturn during the last quarter of the program year. The goal of stably re-housing 450 persons in households (total for prevention and rapid re-housing) was not achieved, as 262 persons achieved this outcome in 2020.

**Discuss how these outcomes will impact future annual action plans.**

Outcomes for activities in FFY 2020 do not seem to suggest a need to change activities in the next action plan.

The state will continue to solicit input from stakeholders and partners annually in order to respond to the housing and community development needs of Minnesota communities and will write future annual action plans based on that process, e.g., based on new or changing assistance needs identified by communities, stakeholders, and other assistance providers.

**Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.**

<table>
<thead>
<tr>
<th>Number of Households Served</th>
<th>CDBG Actual</th>
<th>HOME Actual</th>
<th>NHTF Actual</th>
</tr>
</thead>
<tbody>
<tr>
<td>Extremely Low-income</td>
<td>105</td>
<td>16</td>
<td>-</td>
</tr>
<tr>
<td>Low-income</td>
<td>95</td>
<td>7</td>
<td>-</td>
</tr>
<tr>
<td>Moderate-income</td>
<td>125</td>
<td>1</td>
<td>-</td>
</tr>
<tr>
<td>Total</td>
<td>325</td>
<td>24</td>
<td>-</td>
</tr>
</tbody>
</table>

Table 13 – Number of Households Served

**Narrative Information**

As reported in IDIS, 99% of beneficiaries of CDBG rehabilitation housing programs in 2020 had incomes at or below 80% of HUD median income. One percent served non low-mod income participants while the remainder 99% served extremely low to moderate participants meeting HUD’s below 80% income limits and CDBG requirements of 51% of rental property be occupied by LMI participants. In accordance with guidelines, all households assisted with HOME funds have gross incomes at or below 80% of area median income, and tenant rents meet the affordability requirements of 24 CFR 92.252. For FFY 2020, 67% were in the lowest income category (30% of area median or less), 29% were in the 31%-50% category, and 0% were in the 51%-80% category.

All HOPWA-assisted households had gross incomes at or below 80% of area median income; 52% had incomes at or below 30% of area median.
CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

Evaluate the jurisdiction’s progress in meeting its specific objectives for reducing and ending homelessness through:

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

The annual Point-in-Time count showed, as of January 2019, an increase of 10 percent in the total number of Minnesotans experiencing homelessness (from January 2018), a 11 percent decrease in homelessness among families with children, and a three percent decrease in the number of unaccompanied youth under 25 experiencing homelessness. The number of unsheltered persons (living outdoors, in vehicles, etc.) increased alarmingly (47 percent) from 2018 to 2019. Additionally, our preliminary 2020 PIT count data indicates a continued rise in the number of people experiencing unsheltered homelessness with a 14 percent increase from 2019. These numbers do not reflect the impact of the COVID-19 pandemic on people experiencing unsheltered homelessness which has only exacerbated the shortage of low-barrier housing with support services in many areas of the state relative to need.

The State of Minnesota provides funding to a number of street outreach, emergency shelter, and transitional housing programs primarily with state resources. State agencies worked in collaboration with the Continuum of Care (CoC) Committees to develop coordinated assessment systems in all areas of Minnesota, which will serve as a focal point for assessing the individual needs of both unsheltered and sheltered people.

The Minnesota Interagency Council on Homelessness is led by the Lieutenant Governor and includes 14 Cabinet-level agencies working together to end homelessness in Minnesota. Having met the goal of the Business Plan to End Long-Term Homelessness (to provide 4,000 additional housing opportunities by 2015), the Interagency Council, in partnership with stakeholders across the state, adopted Heading Home Together: Minnesota’s 2018 – 2020 Action Plan to Prevent and End Homelessness, which include principles and strategies to guide efforts to prevent and end homelessness in Minnesota.

This plan reflects a growing community understanding and emerging consensus about what is needed to prevent and end homelessness in Minnesota and the strategies necessary to achieve that goal. The specific content of the plan represents a synthesis of Federal policy requirements and guidance, local practitioner knowledge, the insight of people with lived experience of homelessness, and extensive input from stakeholders all across Minnesota. Numerous organizations statewide have endorsed the guiding principles for this plan. These partners have also contributed substantially to shaping its strategies.

Beginning in March 2020, in response to the COVID-19 pandemic, the Minnesota Interagency Council on Homelessness has convened and led an interagency response team to respond to the needs of people experiencing homelessness. The collective efforts have proven effective in a number of ways. Most importantly, we believe they have prevented greater spread of COVID-19 among people experiencing homelessness. Based on initial modeling of potential infection rates, in March and April there was potential for thousands of people experiencing homelessness to become infected within a few months, with the potential for these infections to result in significant adverse health outcomes, deaths, and a significant strain on the health care system.

This modeling helped organize and reinforce the statewide push to create physical distancing within emergency shelters and extend their operating hours, to increase support for people living outdoors including better sanitation and access to care, to organize testing events for people experiencing homelessness, to contain outbreaks when they occur, and ultimately to create over 2,300 additional safe indoor spaces for people experiencing homelessness. This response was only possible with the mobilization of State agencies and the largest increase in homeless-specific funding in state history. The incredible dedication and creativity in the homeless response system has been remarkable. The Minnesota Interagency Council on Homelessness has several takeaways from the COVID response that will inform future work.

The Minnesota Interagency Council on Homelessness has provided technical assistance to assist in the establishment of CoCs, which have developed regional plans that identify assistance needs of people experiencing homelessness or people at risk of becoming homeless, gaps in regional service delivery for the homeless, and a strategy for addressing those gaps. Currently, 10 CoC regions exist in Minnesota covering the entire state. DHS has offered each CoC committee the opportunity to review and provide recommendations on each ESG application submitted from their region, as well
as other DHS-administered homeless programs. This ensures that ESG funding is used to address locally determined priorities for shelter, prevention and rapid re-housing. In addition, in 2020 Minnesota Housing supported six CoCs in Greater Minnesota with grants ranging from $42,000 to $55,000 each for operating costs.

During the past two years, the Minnesota Department of Human Services (DHS) has initiated a Best Practices and Technical Assistance effort to encourage shelter providers to reduce the number of barriers faced by vulnerable populations seeking emergency shelter. These populations facing barriers may be part of the increase in unsheltered persons who are unable to access emergency shelter due to limited space as well as sobriety, criminal background exclusions, work or case management participation requirements and other barriers to entry.

Additionally, DHS has implemented a new structure for the RFP and granting process in 2019 with the goal to make the process more equitable and accessible. The RFP process incorporated several new strategies including having focus groups with people with lived experience to determine priorities for funding, having people with lived experience on the review panel, conducting interviews with applicant agencies about their projects before making funding decisions to honor oral tradition as opposed to simply relying on a written proposal.

Minnesota Housing secured $60 million in new Housing Infrastructure Bonds during the 2019 legislative session and an additional $10 million in 5th Special Legislative Session of 2020. Since 2012, Minnesota Housing has financed more than 1,400 units of permanent supportive housing using Housing Infrastructure Bonds. Additional permanent supportive housing resources are typically financed with low-income housing tax credits.

To promote early identification and more effective responses to the needs of Minnesota students experiencing housing instability and homelessness, Minnesota Housing, the Minnesota Department of Education, the Minnesota Department of Human Services, the Minnesota Interagency Council on Homelessness, and the Heading Home Minnesota Funders Collaborative have developed an initiative called Homework Starts with Home. Under this initiative, five school- and community-based collaborative programs will help more than 200 homeless or at-risk families with school-age children achieve housing stability and promote academic success. These efforts are supported with three-year grants totaling $4.15 million from three sources: Housing Trust Fund, Family Homeless Prevention and Assistance Program, and philanthropic support.

In 2015, 2017, and 2019 the Minnesota Legislature made an appropriation of $125,000 per year to support the statewide Homeless Management Information System (HMIS). This system helps housing and service providers to more effectively coordinate assistance and services to meet the needs of the homeless or near-homeless people. Minnesota Housing and the Department of Human Services annually supports the operation of HMIS, along with contributions from providers and CoCs. In 2020, Minnesota Housing contributed $300,000 to HMIS.

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

ESG funding is used to strengthen the Continuum of Care (CoC) systems by providing direct services to homeless persons. ESG funds were provided to sub-recipients in every CoC region, each of which has a priority to provide shelter and supportive services for homeless individuals and families. ESG funds also were provided to shelters in all CoC regions to pay for the operating and service costs of these programs, and to re-housing providers to rapidly re-house persons experiencing homelessness.

CoC organizations apply to HUD annually for funding under the McKinney Vento Homeless Assistance Program to address homelessness. In addition, the state funds both site-based and scattered-site transitional housing with approximately $3.2 million in state funds each year, and emergency shelters and day shelters with $844,000 per year in state funds plus a one-time additional appropriation of $1.5M for state fiscal years (SFY) 2020 and 2021.

In August 2019, the Center for Medicare and Medicaid Services (CMS) approved the Minnesota Department of Human Services (DHS) plan to add Housing Stabilization Services to the state’s Medicaid plan. The new services for seniors and people with disabilities were launched by DHS in July 2020. The purpose of the services are to support an individual’s transition into housing, increase long-term stability in housing in the community, and avoid future periods of homelessness or institutionalization. These new services are a major step forward for Minnesota to support thousands
of extremely low-income seniors, people with disabilities and people experiencing homeless to access and maintain housing in their community and are a critical component to advance the state’s Olmstead Plan and the plan to prevent and end homelessness.

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

The state received $2,201,143 in FFY 2020 in ESG program funding to support sub-recipients’ ongoing efforts to provide shelter and rapid re-housing and prevention assistance to homeless and at-risk households. This included 106,375 for state administrative costs. ESG funds were used to provide supportive services to persons through the emergency shelter where they were staying, as well as prevent and rapidly re-house households who were at-risk of or experiencing homeless. Supportive services included case management, transportation, mental health care, substance abuse treatment, childcare, and legal advice and assistance.

One of the state’s most significant strategies for providing homelessness prevention assistance is the Family Homeless Prevention and Assistance Program (FHPAP). The Minnesota Legislature increased the base funding for the program from $17.038 million to $20.538 million for the next two-year period. With these resources, Minnesota Housing assisted over 6,000 households in 2019 by providing short-term housing and services, primarily to families with children with median incomes below $12,000. The state also provides $23.3 million in base appropriation funding for the state Housing Trust Fund, annually serving around 1,600 households. This funding is used for rental assistance for families and individuals, many of whom have experienced homelessness. In 2019, the Legislature increased funding for the Bridges rental assistance program from $8.2 million to $8.7 million for the next two years. Under the Bridges program, Minnesota Housing provides rental assistance to households in which one or more adult members has a serious mental illness, annually serving around 890 households. This program helps people with disabilities live in a more community-based and integrated setting while receiving services. In FY 2021, Minnesota Housing received $100 million in federal Coronavirus Relief Funds for the COVID-19 Housing Assistance Program. The program provided housing assistance payments to help prevent eviction, prevent homelessness and maintain housing stability for eligible renters and homeowners. The program covered past due housing expenses such as: rent, mortgage and utility payments. The program was available statewide through local administers and prioritizes individuals and families at 200% of federal poverty guidelines or below. The COVID-19 Housing Assistance Program and the Governor’s Executive Order suspending evictions during COVID-19 and the peacetime emergency were the State’s main response to housing instability during the pandemic.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

People experiencing homelessness are often unable to access and use mainstream programs because of the inherent conditions of homelessness, as well as the structure and operations of the programs themselves. While all low-income populations face barriers to applying for, retaining, and using the services provided by mainstream programs, these barriers are compounded by the inherent conditions of homelessness, such as transience, instability, and a lack of basic resources. Furthermore, the underlying structure and operations of mainstream programs are often not conducive to ensuring that the special needs of homeless people are met.

Accordingly, any program providing services or resources that contribute to preventing or ending homelessness should ensure that people experiencing homelessness are not disproportionately disadvantaged in accessing these resources, when compared to people who are stably housed.
In September 2014, the agencies comprising the Minnesota Interagency Council on Homelessness adopted five Foundational Services Practices intended to help our “mainstream” programs – those not specifically targeted to people experiencing homelessness – work better for people experiencing homelessness who are eligible for those programs.

The five Foundational Service Practices are:

1. Know the housing status of people served
2. Actively reach out to the homeless
3. Limit requirements for in-person appointments
4. Assist with gathering required verifications/ documentation
5. Allow for multiple methods of communication about benefits and services.

Currently, nine of the Council agencies have implemented these practices across one or more programs in their agency, including Minnesota Housing, and are seeing increasing accessibility to programs and also an increase in innovation in how agencies are working with individuals and families experiencing homelessness.

The Council, primarily through the work of the Minnesota Department of Veterans Affairs, developed a Veterans Registry that enables service providers to identify the resources each individual veteran experiencing homelessness needs and to make the appropriate connections with those resources. The annual Point-in-Time count shows that veterans’ homelessness in Minnesota has been drastically reduced since 2010. Between the 2019 and 2010 counts, the number of veterans experiencing homelessness decreased by 54 percent. This number decreased slightly (one percent) between the 2018 and 2019 counts. Five regions of the state, representing 65 of the state’s 87 counties, have been confirmed by the Federal government as having met all criteria to show they have ended Veteran homelessness. These regions have also presented evidence that they have systems in place to meet the needs of Veterans at-risk of or experiencing homelessness on an ongoing basis. As of October 8, 2020, 294 Veterans remain on the Veterans Registry statewide.

Minnesota's Homeless Youth Act (HYA) program funds outreach, emergency shelter, transitional living programs, supportive housing and service to homeless youth across the state. The annual funding levels and number of youth served are as follows:

<table>
<thead>
<tr>
<th>Year</th>
<th>Funding Level</th>
<th>Youth Served</th>
</tr>
</thead>
<tbody>
<tr>
<td>2015</td>
<td>$3,119,000</td>
<td>5,594 Youth</td>
</tr>
<tr>
<td>2016</td>
<td>$4,119,000</td>
<td>14,961 Youth</td>
</tr>
<tr>
<td>2017</td>
<td>$4,152,000</td>
<td>12,332 Youth</td>
</tr>
<tr>
<td>2018</td>
<td>$5,619,000</td>
<td>12,662 Youth</td>
</tr>
<tr>
<td>2019</td>
<td>$5,619,000</td>
<td>12,165 Youth</td>
</tr>
</tbody>
</table>

Minnesota Housing places a priority in its Request for Proposals and funding selection process on rental housing development that includes units of supportive housing for high priority homeless individuals. Most developments that receive funding have at least some supportive housing units.

As a part of the COVID-19 response for people experiencing homelessness, providers have partnered with the with county, city, and state to support a “hotel-to-home” that has been used to bring hundreds of people sleeping outside into hotel units and on a path to housing. DHS adapted the state’s Housing Support and Emergency Services Program resources for this “hotel-to-home” model, people eligible for Housing Support could ultimately leave their hotel to move to a private-market affordable rental housing.
Actions taken to address the needs of public housing

In 2020, the Legislature appropriated $16 million in general obligation bond proceeds for the purpose of preserving public housing. The funds are used for health, safety and energy efficiency improvements in existing public housing in all 87 counties. In 2018, the funding went to 29 developments across the state, preserving 1,622 housing units. The recent authorization of $16 million will be awarded to projects in the first half of 2021. Since 2012, the Legislature has authorized $61.5 million in resources specifically for the preservation of public housing:

<table>
<thead>
<tr>
<th>Year</th>
<th>Amount</th>
<th># of Projects</th>
<th># of Units</th>
</tr>
</thead>
<tbody>
<tr>
<td>2012</td>
<td>$5.5 million</td>
<td>14</td>
<td>950</td>
</tr>
<tr>
<td>2014</td>
<td>$20 million</td>
<td>35</td>
<td>2,438</td>
</tr>
<tr>
<td>2017</td>
<td>$10 million</td>
<td>27</td>
<td>1,844</td>
</tr>
<tr>
<td>2018</td>
<td>$10 million</td>
<td>20</td>
<td>1,622</td>
</tr>
<tr>
<td>2020</td>
<td>$16 million</td>
<td>TBD</td>
<td>TBD</td>
</tr>
<tr>
<td>Total</td>
<td>$61.5 million</td>
<td>96</td>
<td>6,854</td>
</tr>
</tbody>
</table>

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

Minnesota does not own or manage public housing and does not have access to public housing residents to encourage them to participate in management or homeownership.

Minnesota Housing encourages homeownership for lower income households through outreach and education under the Enhanced Homeownership Capacity Initiative and the Homeownership Education, Counseling, and Training Program. Minnesota Housing's affordable mortgage financing and down payment loans are available to first-time and repeat homebuyers that meet income requirements. In 2019, these programs served nearly 20,000 potential homebuyers.

Actions taken to provide assistance to troubled PHAs

The state recognizes the need for preservation and rehabilitation of federally assisted affordable housing, and provides General Obligation Bond proceeds for rehabilitation under Minnesota Housing's Publicly Owned Housing Program, but Minnesota had no specific goal in the Action Plan for 2020 to provide financial or other assistance to troubled PHAs in the state.

CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)

In 2014, Minnesota Housing, the McKnight Foundation, Urban Land Institute of Minnesota (ULI-MN)/ Regional Council of Mayors (RCM), and Enterprise Community Partners sponsored a competition (Minnesota Challenge) to generate ideas for reducing the per-unit cost of developing affordable multifamily rental housing. The competition winner, the University of Minnesota’s Center for Urban and Regional Affairs, identified specific local policies, requirements, and procedures that increase costs and hinder the development of affordable housing. The report also identifies best practices for overcoming barriers to affordable housing development and strategies for implementing those best practices. A number of local jurisdictions have made changes that align with these recommendations. Each city, township and county in the seven county metropolitan area recently completed comprehensive plans that are in effect starting in 2020.

Minnesota Housing through its annual allocation of development resources is encouraging different construction methods that can reduce the cost of housing construction, including but not limited to modular construction.
Minnesota Housing has implemented cost containment measures in its funding selection process by identifying projects with high costs (based on Agency and industry standards) and requiring justification for those with higher-than-expected costs. Details can be found here: Annual Cost Containment Report

The state has identified limited resources as a barrier to the provision of affordable housing development. To increase the development of affordable housing, Minnesota Housing work with partners has consistently requested funds in the bonding bill for Housing Infrastructure Bonds to address the barrier of a lack of financing. Since 2012, the Legislature has authorized $45.5 million in resources specifically for Housing Infrastructure Bonds:

<table>
<thead>
<tr>
<th>Year</th>
<th>Appropriated (Millions)</th>
<th>Awarded (Millions)</th>
<th># of Multifamily Projects</th>
<th># of Single Family Projects</th>
<th># of Units</th>
</tr>
</thead>
<tbody>
<tr>
<td>2012</td>
<td>$30</td>
<td>$30</td>
<td>8</td>
<td>5</td>
<td>472</td>
</tr>
<tr>
<td>2014</td>
<td>$80</td>
<td>$70</td>
<td>11</td>
<td>5</td>
<td>1,239</td>
</tr>
<tr>
<td>2015</td>
<td>$10</td>
<td>$20</td>
<td>4</td>
<td>4</td>
<td>162</td>
</tr>
<tr>
<td>2017</td>
<td>$55</td>
<td>$42</td>
<td>7</td>
<td>5</td>
<td>555</td>
</tr>
<tr>
<td>2018</td>
<td>$80</td>
<td>$29</td>
<td>14</td>
<td>6</td>
<td>464</td>
</tr>
<tr>
<td>2019</td>
<td>$60</td>
<td>$118</td>
<td>16</td>
<td>5</td>
<td>946</td>
</tr>
<tr>
<td>2020</td>
<td>$100</td>
<td>TBD</td>
<td>TBD</td>
<td>TBD</td>
<td>TBD</td>
</tr>
<tr>
<td>Totals</td>
<td>$415</td>
<td>$309</td>
<td>60</td>
<td>30</td>
<td>3,838</td>
</tr>
</tbody>
</table>

The Legislature also provides additional development resources in the agency’s biennial budget. For FY 2020-21 they authorized:

1. $30.850 million for the Economic Development and Housing Challenge program to fund both multifamily rental and singly family homeownership new construction and redevelopment.
2. $4 million in the Greater Minnesota Workforce Housing Program for financial assistance to build market-rate and mix-income residential rental properties.
3. $8.436 million in preservation resources to assist with repair, rehabilitation and stabilization of federally assisted rental housing that is at risk of aging out of federal assistance programs.
4. $7.486 million in rental rehabilitation loans to preserve rental housing in small communities.
5. $5.544 million in single family rehabilitation loans to help low-income homeowners make basic health and safety improvements to their homes.
6. $2 million in funding for the manufactured home park redevelopment to provide grants for manufactured home park acquisition, improvements and infrastructure.

**Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)**

In its five-year plan, Minnesota identifies that the greatest unmet housing need is among extremely low-income renters (<30% are median income) and moderate income homeowners (51%-80% of are median income). To address that need:

1) DEED uses 85% of CDBG funds to assist low- and moderate-income households (i.e., defined by HUD as 80% or less of median income); and the remaining funds are used for community development; 2) Minnesota Housing allocates HOME resources to rental new construction and rehabilitation. In addition, while activities of the first NHTF project are not reported in this CAPER, 100% of households assisted must be extremely low-income.

The distribution of assistance shows that 59% of all households in HOME-assisted units reported (all years since 1992) were in the lowest income category (30% of area median or less), 32% were in the 31%-50% category, and 10% were in the 51%-80% category.
Under the Section 811 PRA Supportive Housing Program, HUD has awarded Minnesota three rounds of funding for a total of 325 units of project-based rental assistance to create integrated supportive housing for people with disabilities who are extremely low-income. Minnesota is focusing these units to serve people who are long-term homeless or leaving institutions of care. Minnesota Housing is implementing this program in collaboration with the Minnesota Department of Human Services (DHS). DHS coordinates outreach and referrals for 811 applicants and ensures that tenants are connected to service providers. The 811 PRA program is an important tool to support the goals of the state’s Olmstead Plan to provide integrated housing options for people with disabilities. Minnesota Housing has awarded contracts to property owners for 159 units at 24 properties, there are currently 146 households living in Section 811 PRA units. Round Three will be awarded through a pipeline application and through the RFP process starting in Spring, 2021.

For the 2020-2021 biennium, the Minnesota Legislature appropriated funds to people with some of the greatest housing needs, including: $8.7 million through the Bridges program to provide rent assistance to households experiencing mental illness; $20.5 million for family homeless prevention and assistance; and $23.3 million for the state Housing Trust Fund, which provides rent assistance to households at the lowest income levels. In 2019, median annual household income for these programs were $10,224, $11,899 and $9,972 respectively.

In addition, in 2019, the Minnesota Legislature provided $3.5 million in base funding for the Homework Starts with Home initiative to provide rental assistance to families with school age children that are homeless or highly mobile. The Workforce Housing Development program received $4 million in base funding which provide development resources for housing in underserved communities in Greater Minnesota. The Legislature also authorized $60 million in Housing Infrastructure Bonds in 2019 and $100 million in 2020.

Minnesota Housing is also directing more development resources to projects intended to serve people with incomes at or below 30% AMI, people with disabilities and people experiencing homelessness or at-risk of homelessness. The 2019 RFP Selections included:

- Approximately 579 net new units (27 percent of total units), with and without rental assistance, that will be affordable to Minnesotans at this income level.
- A total of 221 units (10% of total units) specifically set aside to serve people with disabilities in 23 properties.
- A total of 556 units (27 percent of total units) will directly people experiencing homelessness who could benefit from permanent supportive housing. Fifty-two percent of these units will serve high priority homeless households who are households prioritized by the state’s Coordinated Entry (CE) system.

**Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)**

DEED requires that all proposed housing rehabilitation projects on homes built prior to 1978 complete a lead risk assessment by a certified risk assessor. All lead hazards identified must be included in the rehabilitation work conducted by a certified renovator (EPA RRP training) and workers. A lead based paint abatement supervisor is required if the total lead work of the project exceeds $25,000. Grantees must provide all housing occupants the required handouts and lead hazard information pamphlet and collect owner acknowledgement of receipt. If lead is found through an assessment, all notices in 24 CFR Part 35 must be provided.

**Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)**

The Minnesota Family Investment Program (MFIP) is the state's major public assistance initiative for low-income families with children (funded with a combination of federal TANF and state funds). MFIP’s three main goals are to help people leave and remain independent of welfare, obtain and keep jobs, and increase income/decrease poverty. Efforts to ensure that the state meets MFIP goals include: employment and job training services, health care assistance, and child care subsidies for MFIP families. This includes a diversionary work program that helps people to find employment before they reach the need for MFIP. The 2019 Minnesota Legislature approved the first increase (of $100/month) in 33 years to the MFIP monthly cash benefit.
In addition to administering ESG and state-funded homeless assistance programs, the Office of Economic Opportunity (OEO) at the Department of Human Services administers a variety of federal and state funded anti-poverty and self-sufficiency programs, allocating approximately $110 million a year in federal and state appropriations to more than 200 organizations and programs working with low-income families in Minnesota. These programs address families’ basic social needs while providing opportunities for the development of the skills necessary for economic self-sufficiency, and include Federal and State Community Action Grants, Individual Development Accounts (IDA) programs, Supplemental Nutrition Assistance Program (SNAP) Education and Outreach, USDA Commodities (TEFAP) and Minnesota Food Shelf Funding (MFSP).

**Actions taken to develop institutional structure. 91.220(k); 91.320(j)**

Affordable housing and community development assistance in Minnesota depends upon a large network of local lenders, developers, housing authorities, real estate agents, community action agencies, nonprofit organizations, faith-based organizations, and local governments throughout the state. The state fosters cooperation through interagency task forces, councils, and other cooperative efforts identified in its *Consolidated Plan for Housing and Community Development 2017-2021*.

DEED, DHS, and Minnesota Housing work to minimize assistance gaps and to coordinate available resources in a variety of ways: Minnesota Housing and its partners, such as the Metropolitan Council, issue joint requests for proposals and coordinate the process of reviewing and selecting proposals for funding with other agencies. HUD, the U.S. Department of Agriculture, and Minnesota Housing have an interagency agreement to align/reduce state and federal physical inspections of subsidized rental housing. Minnesota Housing and DHS have been working together to develop a more coordinated grant-making process for resources available through both agencies to address the needs of people experiencing homelessness.

In 2020 Minnesota Housing allocated $1.66 million in grants to local organizations under the Technical Assistance and Operating Support Program, which is funded through both legislative appropriations ($650,000 for the 2019-2020 biennium) and Minnesota Housing resources.

**Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)**

The state hosts a number of councils or work groups, including:

1. **The Metro Interagency Stabilization Group (ISG),** which works cooperatively to address policy and financing issues related to the stabilization and preservation of federally assisted and publicly funded rental housing in the Twin Cities metro area. ISG members include Minnesota Housing, the Family Housing Fund, the Minneapolis Community, Planning and Economic Development Department, the Saint Paul Planning and Economic Development Department, Hennepin County, HUD, and the Federal Home Loan Bank of Des Moines.

2. **The Greater Minnesota Interagency Stabilization Group (ISG),** is a consortium of public and nonprofit funders created to cooperatively address policy issues and financing for the preservation of federally assisted rental housing outside of the Twin Cities metro area. The participants include Minnesota Housing, HUD, USDA, DEED, Minnesota National Association of Housing and Redevelopment Officials (NAHRO), Federal Home Loan Bank of Des Moines, Duluth LISC, and the Greater Minnesota Housing Fund. By coordinating information about properties at risk of converting to market rate housing or at risk of loss due to physical deterioration, the participants are able to strategically target their combined resources.

3. **The Minnesota Interagency Council on Homelessness,** which includes 14 state agencies, works to investigate, review, and improve the current system of service delivery to people who are homeless or at risk of becoming homeless; improve coordination of resources and activities of all state agencies relating to homelessness; and advise Minnesota Housing in managing the Family Homelessness Prevention and Assistance Program (FHPAP). Some work of the council is supported by private foundations that fund certain activities under the state’s action plan.
4. The Stewardship Council, works to address the capital, service, and operating needs of supportive housing for homeless families and individuals. The council includes representatives from federal, state, and local agencies as well as private philanthropic organizations and nonprofit agencies.

5. The Minnesota HIV Housing Coalition, which facilitates access to quality housing and appropriate support services for individuals and families living with HIV in Minnesota. The Coalition advises the City of Minneapolis and Minnesota Housing on the expenditure of HOPWA funds.

6. The Olmstead Subcabinet, which includes 13 state agencies/entities responsible for the development and implementation of the state’s Olmstead Plan. The plan strives to ensure that Minnesotans with disabilities will have the opportunity to live, learn, work, and enjoy life in the most integrated setting of their choice.

7. A NOAH Working Group has been formed as a spin-off of the Interagency Stabilization Group. The group is an intergovernmental policy group focused on coordinating advocacy and funding efforts around the preservation of naturally-occurring-affordable-housing (NOAH) properties (which are affordable without government subsidies and income/rent restrictions) in the Twin Cities Metro Area. The group started meeting in the summer of 2020, and includes metro area cities, counties, The Metropolitan Council and intermediaries working on NOAH preservation. The first effort of the Working group has been to coordinate on NOAH data in order to have clear and consistent data (and methodology) about the number of NOAH properties and units in the Metro area. The group has also started a watchlist of NOAH properties that are or may be coming onto the market, in order to coordinate on preservation strategy and resources. This group will work to determine priority projects for preservation, as well as advocating for funding to help preserve NOAH properties.

Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)

State Agencies adopted the most current Analysis of Impediments to Fair Housing Choice in 2018 for FFY 2019-2021 and continue taking actions based on that three year plan.

The state submits the following actions taken in FFY 2020 to address impediments in its 2019 *Analysis of Impediments to Fair Housing*: 
Introduction

It is the policy of Minnesota Housing to affirmatively further fair housing throughout its programs so that individuals of similar income levels have equal access, regardless of protected class status. Minnesota Housing’s fair housing policy incorporates the requirements of the Fair Housing Act, Title VII of the Civil Rights Act of 1968, as amended by the Fair Housing Amendment Act of 1988, as well as the Minnesota Human Rights Act. Fair Housing is an important issue across the country; it is crucial that low-income households have access to affordable housing free from discrimination in communities of their choice.

The State of Minnesota’s current Analysis of Impediments to Fair Housing Choice (AI) and Action Plan were approved by Minnesota Housing’s Board of Directors in September of 2018. Staff developed a three-year action plan to address challenges to fair housing choice for protected classes identified in the AI. This plan was developed to be flexible to respond to market or other forces that impact fair housing challenges. 2020 has brought new challenges not contemplated in the 2018 report, including the economic impacts of the pandemic and civil unrest that followed the death of George Floyd. In addition, HUD recently replaced the Affirmatively Furthering Fair Housing rule which alters fair housing planning and reporting requirements.

The following report reflects activities through all of Minnesota Housing’s programming as well as includes actions in collaboration with the following state partners:

- Department of Human Services (DHS)
- Department of Human Rights (DHR)
- Department of Employment and Economic Development (DEED)
- Minnesota Interagency Council on Homelessness
- Olmstead Implementation Office

The goals areas reflect in the AI are to:

1) Address Disproportionate Housing Needs
2) Address Discrimination and Improve Opportunities for Mobility
3) Expand Access to Housing for Persons with Disabilities
4) Address Limited Knowledge of Fair Housing Laws through Education, Outreach and Developing Tools and Resources
5) Decrease the Loss of Housing Through Displacement and Eviction
**Goal 1: Address Disproportionate Housing Needs**

In this goal area, the State of Minnesota seeks to identify programmatic funding or collaborative responses that can support efforts to increase housing opportunities through expanded or streamlined existing funding resources and through collaboration with a variety of partners to provide services and information and identify other resources.

This goal area addresses a variety of challenges in the housing market faced by households of color and Indigenous communities\(^1\), persons with disabilities, and large families to achieve access to safe quality housing in a community of their choice.

**Challenge 1.a. | Rental Housing in Poor Condition**

Rental housing in poor condition is the top barrier found across the state, particularly for the most vulnerable low-income renters from protected classes under fair housing law. Minnesota Housing and partners prioritize preserving federally assisted housing and existing affordable housing to ensure conditions are safe as part of the state’s key actions to improve conditions. Additionally, supporting tenant education of their rights helps to address this challenge.

**Action: Continue and consider expanding programs to support small rental developments (5-50 units) through continued funding of public housing rehabilitation programs and supporting smaller PHAs to build capacity.**

**Publicly Owned Housing Program (POHP):**

POHP is a competitive funding program that uses the proceeds of General Obligation Bonds (GO) to provide financing in the form of a 20-year, deferred, forgivable loan with a 35-year affordability period to public housing authorities and agencies (PHAs). PHAs use these loans to rehabilitate and preserve public housing in the state. Funds can be used only for capital costs that add value or life to the buildings.

In order to balance PHA capacity with program requirements, POHP program staff has worked to streamline the POHP application to a more concept-based approach. Applicants no longer need to order third party reports, nor provide an exact development budget at application. If the applicant moves beyond the application phase, those elements are completed with the assistance of POHP staff post-selection.

Minnesota Housing staff provides each POHP applicant with an individual technical assistance session prior to the application deadline. During these technical assistance sessions, POHP staff explains general program guidelines and learns more about each applicant’s proposed rehabilitation project. This outreach has been beneficial in improving the quality of applications and encouraging smaller PHAs and HRAs with limited capacity to apply for the first time. Technical assistance is also provided post-selection to applicants during the due diligence process and prior to the loan closing process. Program staff has also previously participated in the Minnesota NAHRO conference to provide program information and additional technical assistance.

These changes have benefitted PHA applicants by simplifying the process and reducing the cost of applying for Agency funds. It has also benefitted POHP staff by allowing them to provide more in-depth technical assistance and help boost the capacity of the smaller number of selected borrowers.

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\(^1\) The Analysis of Impediments plan uses the term “People of Color or Hispanic Ethnicity” – in this report, the term “People of Color and Indigenous Communities” will be used interchangeably as consistent with Minnesota Housing’s most recently adopted Strategic Plan.
**Rental Rehabilitation Deferred Loan Program (RRDL):**
The RRDL program provides resources to rehabilitate existing rental housing in Greater Minnesota so that affordability is preserved and low to moderate income households have access to safe and decent housing.

In 2019, an RFP was held specifically for RD projects. RRDL resources were made available to any owner of RD buildings of eight or more units in the form of a 20-year deferred loan up to $500,000 (or $35,000/unit maximum) with 10% forgiveness at the end of the loan term. In March 2020, selections were approved. Selections included 21 projects, encompassing 544 units. Funds have been committed to address critical deferred maintenance and accessibility issues in these projects.

**Action:** Investigate resources for quick response fund for life/safety concerns by continuing and considering expansion of resources for developments currently in Minnesota Housing’s portfolio and considering establishment of a receivership revolving loan fund under state statute 504B.451.

**Asset Management Loan Program (FA/FAF):**
The Asset Management Loan program provides resources on a pipeline basis to address immediate critical repairs, and deferred maintenance. Part of the funding for this program comes from Financing Adjustment and Financing Adjustment Factor (FA/FAF), which are federal funds.

In year 2, two loans, totaling approximately $3 million were closed, which stabilized 50 units of Project Based Section 8 housing in 2 projects.

**Action:** Continue support for HOME Line as a hotline for tenants’ rights.

Minnesota Housing entered into a new two-year funding contract with HOME Line in the amount of $400,000 in August of 2019, continuing funding from previous years at similar amounts. In Federal Fiscal Year 2020, HOME Line fielded 14,447 tenant calls, most common reasons related to repairs, security deposits, and evictions.

**Challenge 1.b. | Insufficient housing for large families**
In Minnesota, large families and immigrant families face much higher rates of cost burden and overcrowding than other types of renters. Large families are also disproportionately affected by difficulties in finding landlords who accept Section 8 and are met with markets with smaller units. Single family homes are often better sized and configured for larger families.

**Action:** For rental development resources, continue to provide points for large family housing in selection criteria of Minnesota Housing funding resources, including through the Low Income Housing Tax Credit Qualified Allocation Plan.

Minnesota Housing recognizes the need to improve the housing system. This includes focusing on the people and places most impacted, especially children. The 2020 Qualified Allocation Plan (QAP) and 2020 HTC Self-Scoring Worksheet (SSW) incentivized the development of affordable rental housing for families with children in two ways.

First, the QAP contained a family housing threshold option reserved for projects in the metropolitan area where at least 75 percent of the total tax credit units contained two or more bedrooms and at least one-third of the 75 percent contained three or more bedrooms. Outside of the metropolitan area, projects could meet a locally identified housing need, which could include family housing.

Second, the SSW offered opportunities for projects to claim 5-7 points for large family housing with two or more bedrooms if the proposal was for a project that provided family housing that was not restricted to persons 55 years old or older. The owner agreed to market to families with minor children. Additionally, Greater Minnesota proposals were eligible for additional points for proposals that contained units with three or more bedrooms.
In the 2019 RFP/2020 HTC Round 1, 23 projects (60%) claimed large family housing points.

**Action: For homeownership activities, continue to support the enhanced financial capacity program in reaching large immigrant families, prioritize large family housing in the Impact Fund, provide priorities for large families in down payment assistance, and evaluate how these priorities reach large families.**

In FFY 2020 Minnesota Housing provided affordable first mortgage loans to 1,077 households with four or more people.

In FFY 2020, 48% of households receiving financial wellness coaching in the Homeownership Capacity program had 4 or more people.

In FFY 2020, 40% of the households served under the Agency’s Impact Fund development program had four or more people.

**Challenge 1.c. | Homeownership and mortgage lending gaps**

Minnesota experiences one of the largest racial disparities in homeownership in the country, consistently in the bottom three states. Homeownership represents one of the most common wealth building opportunities for households and provides stability for families. A disparity in homeownership rates for Black, Indigenous, and people of color (BIPOC) exacerbates racial disparities in education, health and other outcomes.

**Action: Enhance and continue partnerships to remove barriers to homeownership and reduce the lending gaps between BIPOC and white non-Hispanic households, as well as continue supporting and strengthening the Homeownership Opportunity Alliance.**

In FFY 2020, 34.3% of Minnesota Housing’s Start Up program first time homebuyer loans went to BIPOC households (1,473 of 4,328 loans).

**Homeownership Opportunity Alliance:**

Minnesota Housing co-leads (with the Minnesota Homeownership Center) an industry-wide coalition to expand homeownership for households of color, called the **Homeownership Opportunity Alliance (HOA)**. The ultimate goal of this coalition is to collaboratively develop partnerships, programs, resources and best practices as a catalyst to systemic change that advances homeownership equity in Minnesota. The HOA provides outreach to BIPOC communities through their “Get Ready. Be Ready!” campaign to connect BIPOC households with homebuyer education services and build awareness that homeownership is possible.

In FFY 2020 the HOA accomplished the following:

- Expanded participation to 45 organizations with over 100 individual members.
- Continued the “Get Ready. Be Ready!” campaign outreach and marketing to the African American and African Immigrant communities, including radio, print, and social media efforts. Examples include:
  - Held a homeownership community conversation event in partnership with Al McFarlane
  - Held a homeownership community event in partnership with the Minnesota Chapter of the Somali North American Business Professionals, Inc. (SNABPI)
- Expanded efforts to Greater Minnesota through
  - Recruited several new organizations located in Greater Minnesota.
  - Held a Homeownership industry partner and community event in Rochester.
- Expanded social media presence and activity through Facebook and LinkedIn.
- Developed a tool for lenders to assess and measure progress towards serving more BIPOC households.
Action: Identify homeownership education activities occurring in the market and evaluate program activities; this includes the Homebuyer Education Counseling, and Training (HECAT) program at Minnesota Housing, supporting partners in working on initiatives to help households save for down payments, and other homeownership capacity activities:

Homeownership education, counseling, and coaching programs

As the Agency’s two homeownership education, counseling, and coaching programs moved from a one-year to two-year cycle, it has given better opportunities to proactively reach out to new potential providers, especially those reaching BIPOC communities and underserved geographic areas of the state. We have also been able to work with our key program partners regarding potential increases in foreclosure counseling due to the COVID-19 pandemic.

Action: Partner with Tribal Nations to consider strategies to increase homeownership for American Indian households both on and off tribal lands, including continued work on the feasibility of eventual tenant ownership for eligible tax credit properties and conducting a mortgage lending session at bi-annual Indian Housing conference.

The Agency and its tribal partners are in the final stages of developing an updated Tribal Indian Housing Program (TIHP) manual, which should increase homeownership opportunities for indigenous households throughout the state.

Challenge 1.d. | Very high standards for rentals
When rental properties require standards out of reach for many renters, the barriers to getting housing increase dramatically, especially in a very tight rental market, and impact people of color, people with disabilities and large families most dramatically. Properties often require three times income, high security deposits, and require no past record of criminal activities or credit problems.

Action: If found effective, seek additional resources to expand the Landlord Risk Mitigation Fund program to help address housing needs of persons with criminal records, substance abuse challenges and other barriers.

The Landlord Risk Mitigation Fund (LRMF), administered by Minnesota Housing, provides financial assurances for landlords concerned about additional risks related to damaged property, non-payment of rent, or evictions costs. Landlords renting to tenants enrolled in these programs can access reimbursement from these funds when damages and expenses exceed a tenant’s security deposit.

Between the period of September 1, 2017, the start of the landlord risk mitigation fund pilot, and August 31, 2020, 103 households with significant barriers have obtained housing. There have been seven landlord claims, or 7.69% of total households. The following tables offer detailed information on household served by subpopulations and race:
## Subpopulations

<table>
<thead>
<tr>
<th>Subpopulations</th>
<th>Percent*</th>
</tr>
</thead>
<tbody>
<tr>
<td>Veteran</td>
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<tr>
<td>Chronically Homeless</td>
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<tr>
<td>Long-Term Homeless</td>
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<tr>
<td>Discharged from Jail/Prison</td>
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<tr>
<td>Domestic Violence at any point in reporting period</td>
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<tr>
<td>Fleeing domestic violence</td>
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<tr>
<td>Disability of Long Duration</td>
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<tr>
<td>Chronic Health Condition</td>
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<td>Physical Disability</td>
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<tr>
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<td>Substance Use Disorder</td>
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<tr>
<td>Developmental Disability</td>
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<tr>
<td>HIV/AIDS</td>
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</table>

## Race

<table>
<thead>
<tr>
<th>Race</th>
<th>Percent*</th>
</tr>
</thead>
<tbody>
<tr>
<td>White</td>
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<tr>
<td>Black or African-American</td>
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<td>Asian</td>
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<tr>
<td>Native Hawaiian</td>
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<tr>
<td>Don’t Know/Missing/Refused</td>
<td>1.4</td>
</tr>
</tbody>
</table>

*Rounded
Due to the success of the landlord risk mitigation fund program to date, Minnesota Housing obtained board approval to provide a two-year contract extension to the three current grantees. We are utilizing Family Homeless Prevention and Assistance funds to provide continued housing navigation staffing and administration costs. Due to the limited use of the landlord fund, we did not need to increase funding for this pool.

**Action:** Regularly provide informational materials on best practices related to tenant selection plans to owners and manager of properties of Minnesota Housing financed rental developments.

Minnesota Housing’s Supportive Housing team has been leading continuing efforts to expand Tenant Selection Planning guidance and requirements to break down barriers to accessing housing. This year after robust community engagement, the TSP requirements were revised and sent out for public comment through two revisions with a final plan to go to the Minnesota Housing board in December 2020 for adoption. The proposed changes to tenant screening criteria and processes will remove some housing access barriers for people most impacted by exclusionary screening criteria. Changes include:

- Adding a requirement to review mitigating evidence from applicants at the time of application
- Adding criteria that limits the review of housing history, credit and income requirements for all units
- For supportive housing units, removing or limiting screening criteria for people experiencing homelessness and/or with disabilities:
  - Applicants cannot be rejected based on housing and credit history and cannot require an income to rent ratio. These are common barriers for people experiencing homelessness and housing instability.
- Limiting criminal screening criteria to address the disparate impact for people of color and people who have been homeless.

**Challenge 1.e. | Affordable housing and landlords accepting housing choice vouchers only located in higher poverty areas**

When a household receives a tenant-based Housing Choice Voucher, they are able to find housing of their choice in the marketplace. However, voucher holders face many barriers in utilizing vouchers and often face landlords who do not accept the voucher or have rents above payment standards.

**Action:** Continue to prohibit properties with funding through Minnesota Housing from refusing to lease to a tenant based on the status of the tenant as a voucher-holder or recipient of similar rental assistance.

Owners of properties financed through Minnesota Housing cannot refuse to lease a unit in the project because the applicant holds a voucher. Compliance of this requirement is monitored through affordability period.

We have made two significant proposed policy changes to the proposed 2022-2023 LIHTC Qualified Allocation Plan.
First, we recommended adding the following requirements for LIHTC (9% and 4%) and deferred projects: Must set aside a minimum of 2% of units with rents restricted at 30% MTSP rent levels. Must set aside a minimum of 3% of unit rents at or below the housing assistance payment (HAP) standard, which may be the same units as the 30% MTSP units or different units.

Second, we recommended creating a pointing incentive for deeper rent targeting with four new point tiers ranging from 5-9%, 10-19%, 20-29%, and 30-40% of total units with rents at 30% of MTSP. Rents at the lower 30% MTSP limits align much better with HAP standards than LIHTC rents at 50% or 60% MTSP limits, which exceed the HAP payment standard in some markets.

The QAP also provides geographic scoring incentives for locations with greater housing affordability needs, which are defined as places with a low share of affordable rental housing as compared to all housing options in a community or a large share of renters that are cost burdened by their rent.
Goal 2: Address Discrimination and Improve Opportunities for Mobility

In this goal area, the State of Minnesota intends to identify strategic and collaborative approaches to consider both place-based solutions and mobility solutions to provide households access to housing in communities of their choice.

Challenge 2.a. | Non-white and Hispanic residents are disproportionately segregated into some, often high poverty neighborhoods

Decades of housing policies that racially segregated communities and continued implicit and explicit practices disproportionately limit choice of households of color and Indigenous communities in Minnesota.

Action: Support efforts to review where investments in creation, preservation, and rehabilitation of affordable housing is occurring relative to areas of concentrated poverty and economic opportunity to encourage a full range of housing choices. (For example, helping to keep HousingLink’s Low Income Housing Tax Credit development database current to report distributions).

Minnesota Housing annually reviews the distribution of investments in affordable housing. The Low income Housing Tax Credit is the predominant tool for financing new affordable housing. New LIHTC unit financed by Minnesota Housing between 2005 and 2019 are spread throughout the Twin Cities Metropolitan Region, with 10 percent of these units located in HUD’s defined “Racially and Ethnically Concentrated Areas of Poverty”.

Minnesota Housing provides ongoing support of the HousingLink Streams database, which includes LIHTC and other affordable housing to make data accessible for analysis.

Challenge 2.b. | Challenges in accessing housing in concentrated areas of wealth or other opportunities

Households of color or Indigenous communities, large families, and voucher holders disproportionately lack access to housing in concentrated areas of wealth or other opportunities.

Action: Evaluate and continue solutions that mitigate barriers to developing housing in areas of wealth or other opportunities. (For example, address barrier of NIMBYism).

Through its Intermediary Capacity Building Grant program, Minnesota Housing provides grants to organizations to provide a combination of pass-through grants and technical assistance to cities and organizations. One intermediary grantee, Minnesota Housing Partnership (MHP), provides Housing Institutes in Greater Minnesota to make significant progress toward the development, rehab, or preservation of affordable housing units or other positive community housing outcomes. The technical assistance MHP provides, together with pass-through grant dollars to fund the development of planning efforts allow grantees in Greater Minnesota to be better positioned to address their affordable housing needs. In the metropolitan Twin Cities Region, Intermediary Grantee Urban Land Institute (ULI), provides “Navigating Your Competitive Future” workshops for suburban, primarily higher wealth communities. ULI provides approximately ten workshops per year. The format is a two-hour interactive workshop outlining the need for communities to be responsive to demographic changes and feature presentations of national and state-wide trends, focused community change data, a panel discussion and
interaction with workshop participants. ULI also provides deeper assistance through half-day Technical Assistance Panels (TAPs), which are focused dialogues and technical review of the development potential on a particular site or a local development issue.

Minnesota Housing hosted a series of three Greater Minnesota engagement and technical assistance sessions about our multifamily and single-family resources. These events were well-attended, and the audience included city and county staff and community partners. We held these sessions in response to hearing from cities that they wanted to have a more active role in affordable housing development, but did not know where to begin or how to access these resources. In addition to these sessions, in the Fall of 2020, we also participated in a number of convenings hosted by our partners (League of Minnesota Cities and Southeast Minnesota Together) to provide a similar overview of our resources and how to connect with the Agency for next steps.

**Action:** Monitor any proposed regulatory changes regarding source of income protections.

Minnesota Housing is evaluating source of income protection work at the City of Minneapolis and other local jurisdictions through policy and community development efforts.

**Challenge 2.c. | Challenges accessing economic and other opportunities**

Racially segregated communities have experienced disinvestment and continue to experience disinvestment that reduces economic opportunities in these communities. Accessing opportunities disproportionately impacts persons with Limited English Proficiency.

**Action:** Promote contracting opportunities for women and Black, Indigenous, and People of Color-owned business entities in all programs.

Minnesota Housing promotes contracting opportunities for women and BIPOC business entities through multifamily and single family programs.

For single family programs, the Impact Fund development program provides an incentive for applicants led by BIPOC and women.

For multifamily, this year, Minnesota Housing has proposed three significant changes in the 2022-2023 Qualified Allocation Plan (QAP) to address challenges accessing economic and other opportunities, specifically for individuals and groups who have faced historic housing discrimination and want to participate in the development or management of affordable housing.

First, we recommended to retitle the Minority-owned/Women-owned Business Enterprise (MBE/WBE) scoring criterion as Black, Indigenous, and People of Color-owned/Women-owned Business Enterprise (BIPOCBE/WBE) to make clear that the criterion includes black, indigenous and People of Color-owned businesses.

Second, we recommended adding additional opportunities for selection points for projects that include two or more key members of the development team who are BIPOCBE/WBE. Sixty six percent of submitted applications under the 2020 QAP/2019 RFP had at least one BIPOCBE/WBE team member. The additional points create greater incentive for multiple development team members to be BIPOCBE/WBE individuals or majority businesses.
Third, we recommended adding additional opportunities for selection points for projects where the project sponsor, general contractor, architect or management agent has a partnership with a BIPOCBE/WBE entity with the goal of building the BIPOCBE/WBE entity’s capacity to develop, manage, construct, design or own affordable housing in the future.

Minnesota Housing also have hiring process goals for BIPOCBE/WBE that apply to all projects receiving Agency deferred loan funding, including federal and non-federal sources. The goals are designed to achieve certain outcomes of BIPOCBE/WBE participation at the development and subcontractor level. The participation goals are:

- **BIPOCBE:**
  - Twin Cities metro: 13% of the total amount of all contracts
  - Greater MN: 4% of the total amount of all contracts
- **WBE:**
  - Entire state: 6% of the total amount of all contracts

Staff evaluated 2019 Contractor Compliance Activity Reports (CCAR) and other data that provides evidence for dedicated work in this space.

- Of six Twin Cities Metro projects, none met the MBE goal of 13% and two met the WBE goal of 6%
- Of eight Greater MN projects, one met the MBE goal of 4% and five met the WBE goal of 6%

**Action: Continue to support the preservation of affordable housing opportunities as a strategy for community investment.**

Minnesota Housing continues to be involved in a rural preservation workgroup. USDA Rural Development 515 properties have unique preservation challenges, and Minnesota Housing includes a set aside in the Low-Income Housing Tax Credit program and has recently partnered with USDA RD to create a specific initiative under the Rental Rehabilitation Deferred Loan program on 515 properties.

Minnesota Housing is also the contract administrator for the Performance Based and Traditional Contract administration programs for project-based Section 8 properties in Minnesota. This administrative work with these properties allows the state to better understand and address the preservation needs of these properties.
Goal 3: Expand Access to Housing for Persons with Disabilities
The State of Minnesota seeks to identify collaborative and programmatic funding responses to rehabilitate and create new accessible affordable housing options, support accessibility improvements in single units, and help people with disabilities transition into independent living settings.

Challenge 3.a. | Shortage of affordable, accessible housing
For people with disabilities, simply acquiring housing and remaining housed are significant challenges. Wait lists for affordable, accessible housing are years long in many rural areas.

Action: Evaluate and enhance existing funding resources to provide preference in housing developments for persons with disabilities, including preference points in the Low income Housing Tax Credit Qualified Allocation Plan and other competitive capital funding resources.

Multifamily Request for Proposals and Low Income Housing Tax Credit Allocation:
Minnesota Housing recognizes the need to improve the housing system. This includes supporting people with disabilities. The 2020 Qualified Allocation Plan (QAP) and 2020 HTC Self-Scoring Worksheet (SSW) incentivized the development of affordable rental housing serving people with disabilities in two ways.

First, projects selected through the QAP must meet one of five threshold areas and one specifically pertains to housing persons with disabilities. Projects without age restrictions can achieve this threshold through a percentage of the units set aside and rented to persons who meet one of five definitions related to disabilities.

Second, the SSW offered opportunities for projects to claim 7-10 selection points for units set aside for people with disabilities.

Publicly Owned Housing Program:
Out of the 2018 POHP projects (which were approved in spring 2019, and are mostly under construction), Blue Mound Tower added an ADA door opener to the building to improve accessibility for disabled residents. The 2018 POHP projects also included several elevator modernizations and walkway improvements, which improves accessibility and safety for all residents. With the approved 2020 bonding bill, staff will continue to prioritize accessibility and health and safety items for funding.

Rental Rehabilitation Deferred Loan Program (RRDL):
in 2019, Minnesota Housing carried out an RFP specifically for USDA Rural Development (RD) properties. RRDL resources were made available to owners of RD buildings of eight or more units in the form of a 20-year deferred loan up to $500,000 (or $35,000/unit maximum) with 10% forgiveness at the end of the loan term. In March 2020, selections were approved. Selections included 21 projects, encompassing 544 units. Funds have been committed to address critical deferred maintenance and accessibility issues in these projects. Approximately 65% of RD households are elderly or disabled, and the average household income is $13,551. Improvements in selected projects included walkway and pavement fixes, elevator upgrades, and other items designed to improve the overall accessibility and livability of these buildings.
**Action:** If found effective, seek additional resources to expand the Landlord Risk Mitigation Fund program.

Action within Challenge 1.b. above discusses the LRMF program activities.

**Challenge 3.b. | Shortage of resources to make accessibility improvements**

If a voucher holder requires a reasonable accommodation, PHAs may not have the resources available to assist with the accommodation. There are also not resources to assist non voucher holders in accessibility improvements more broadly.

**Action:** Provide education and outreach of existing homeownership programs to make accessibility improvements, including streamlining Minnesota Housing’s Rehab Loan Program to make program more accessible to lenders, and promote to seniors and persons with disabilities, evaluating the Impact Fund projects for accessibility improvements, continuing to promote Minnesota Housing’s Fix Up Fund for persons with disabilities, and continuing to provide priorities for down payment assistance.

**Fix Up loan program:**

During FFY 2020, Minnesota Housing provided home improvement loans to at least 16 households with a disability.

**Rehabilitation Loan Program (RLP):**

In FFY 2020, 48% of the households served by the income-targeted RLP (an income at or below 30% area median income) had at least one household member with a disability.

**Homeownership Programs:**

In FFY 2020, Minnesota Housing provided affordable first mortgage loans to at least 46 households with disabilities, all of whom also received a Minnesota Housing down payment and closing cost loan.

**Challenge 3.c. | Shortage of resources to transition to independent living settings**

There is a shortage of workers to help transition to and support independent living, and processes to apply for supports are complex and onerous.

**Action:** Collaborate with housing and supports activities in the state’s Olmstead Plan and initiatives that increase the number of people with disabilities who live in the most integrated housing of their choice.

There are several key activities in the [Olmstead workplan](#) related to housing and services in partnership with Minnesota Housing. These include:

- The Bridges program (described below)
- The Section 811 program (described below)
- Ensuring HousingLink’s products and services serve people with disabilities.
**Action:** Minnesota Housing will continue to provide rental assistance to persons with serious mental illness and evaluate program effectiveness.

The Bridges Rental Assistance program provides housing assistance for people with very low incomes and a mental illness while they wait for a Housing Choice Voucher or another rental subsidy. Eligible uses for Bridges funding include temporary rental assistance payments and security deposits paid directly to landlords on behalf of qualified participants. In FFY 2020, the Bridges program served 750 households.

**Action:** Minnesota Housing and DHS will continue implementation of the Section 811 rental assistance pilot, partner with HUD in program evaluation, and if found effective, consider other funding sources available for similar program should no further federal assistance become available.

Under the Section 811 PRA Supportive Housing Program, HUD has awarded Minnesota three rounds of funding for a total of 325 units of project-based rental assistance to create integrated supportive housing for people with disabilities who are extremely low-income. Minnesota is focusing these units to serve people who are long-term homeless or leaving institutions of care. The 811 program households have average incomes less than $10,000 annually and are receiving on average, monthly assistance of about $580. All households include an individual with a disability and half of households identify as a person of color or from Indigenous communities. Minnesota Housing is implementing this program in collaboration with the Minnesota Department of Human Services (DHS). DHS coordinates outreach and referrals for 811 applicants and ensures that tenants are connected to service providers. The 811 PRA program is an important tool to support the goals of the state’s Olmstead Plan to provide integrated housing options for people with disabilities. Minnesota Housing has awarded contracts to property owners for 159 units at 24 properties, and there are currently 146 households living in Section 811 PRA units. Round Three will be awarded through a pipeline application and through the RFP process starting in Spring, 2021.

**Action:** Other programmatic action to provide resources to transition into independent living settings, Housing Infrastructure Bonds

In 2018, the Minnesota State Legislature created a new eligible use for Housing Infrastructure Bonds targeting individuals with Behavioral Health needs (people with mental illness or substance use disorders). This new eligible use was created via a separate standing legislative authorization for Permanent Supportive Housing for these populations without requiring tenants to meet specific homeless criteria, thus providing independent living settings.

Over the past two RFP funding cycles, Minnesota has created or preserved 353 units of housing for people with behavioral health needs. In the second year, 165 units of housing for people with behavioral health needs were created or preserved.
Goal 4: Address Limited Knowledge of Fair Housing Laws Through Education, Outreach, and Developing Tools and Resources

The State of Minnesota will engage in collaborative approaches to expand education efforts by partnering with the Department of Human Rights, participation in conferences, and sustaining and improving tools like the Affirmative Fair Housing Marketing Toolkit.

Challenge 4.a. | Limited knowledge of fair housing laws and resources
A perennial fair housing issue is lack of knowledge. Tenants, landlords, lenders, and borrowers do not always know their rights or responsibilities. In addition, we need to strengthen relationships with other Fair Housing entities and partners.

Action: Support efforts to maintain and promote the FairHousingMN.org website and online tool to develop Affirmative Fair Housing Marketing Plans and expand education and oversite of AFHMPs in Minnesota Housing’s portfolios

In FFY 2020, reviews of AFHMP’s were included with all physical inspections conducted by compliance officers on properties financed with Housing Tax Credits, HOME, National Housing Trust, and/or agency deferred loans. The task was added to each physical inspection to track these reviews in Minnesota Housing’s system. The AFHMP review task is considered completed after the review or the compliance officer determines that the review is not applicable because the property is not required to have an AFHMP or the AFHMP is already reviewed by another staff person or entity.

As of 9/30/2020, of the 278 inspections due in CY 2020, 76 AFHMP’s have been successfully reviewed, 110 were not applicable, and the remaining inspections are not yet completed.

Action: Work with Minnesota Department of Human Rights, Minnesota NAHRO, Minnesota Multi Housing Association and similar organizations to provide education regarding housing discrimination laws through their annual conferences.

Minnesota Housing staff continues to meet with industry partners to explore the possibilities of training multifamily property owners, managers and service providers on fair housing. Meetings are conducted with Minnesota Multi Housing Association (MHA), Minnesota NAHRO and HUD, to brainstorm for and develop trainings on current issues to attract attendees and educate them in fair housing.

Training session topics are developed by reaching out to MHA members, as well as Minnesota Housing customers, to determine where gaps in knowledge exist and further training is desired.

The 2020 Working Together Conference was virtual, with fewer and less targeted sessions than in previous years, but the conference explicitly included fair housing related topics into two of the conferences six sessions:

- Fair Housing
- Understanding Implicit Bias
Action: Continue to support educational opportunities and outreach efforts with suburban community elected and appointed officials to understand the important and effectively plan for a full range of housing choices.

As described under 2.b, the Urban Land Institute’s “Navigating Your Competitive Future” workshops are offered for suburban communities and participants include both elected and appointed officials. Minnesota Housing also regularly participates in Regional Council of Mayor’s meetings and Metro Cities housing policy meetings, and Minnesota Housing’s Commissioner has spoken to both of these constituencies about the importance of housing that is affordable and equitable.

Action: Distribute fair housing educational materials at annual conferences, public venues, and other opportunities.

COVID restrictions prevented Minnesota Housing from promoting fair housing at public events.

Minnesota Housing’s internal cultural competency committee hosts monthly events that are often directly related to fair housing issues. The agency hosted a specific fair housing training in April for Fair Housing month. Agency staff are required to attend 4 hours of training through this program each year.

Action: Each State CDBG Grantee must complete at least one fair housing activity each year.

Each of the 139 State CDBG grantees completed at least one unique fair housing activity each reporting period.

DEED Small Cities Development Program (SCDP) staff carries out education efforts for grantees and potential grantees on fair housing and equal opportunity topics during SCDP Implementation trainings and application webinar trainings.

DEED staff distributed Fair Housing and Equal Opportunity brochures and posters (multiple languages) to attendees during events focused on engagement and outreach efforts and during individual technical assistance with grantees throughout the year.

Action: Build relationships and internal capacity for Fair Housing related work

There are three key areas where Minnesota Housing strengthened its Fair Housing work this year. The first involves improvements to the process through which the Agency provides HUD updated data on LIHTC selected projects to keep HUD’s LIHTC database current. The second involves annual coordination with both HUD and the Minnesota Department of Human Rights when we identify properties and management companies that have violated Minnesota Housing’s Fair Housing policy. This information is used to report any Fair Housing violation to the IRS through the 8823 process for LIHTC projects and is used to determine applicable penalties associated with any new applicants for LIHTC funding as outlined in the paragraph below.

Minnesota Housing has clarified in the proposed 2022-2023 LIHTC Qualified Allocation Plan that entities that fail to comply with Minnesota Housing’s policies, procedures or requirements may be penalized according to Minnesota Housing’s Fair Housing Policy, up to an including
disqualification of the application. In addition, Minnesota Housing may impose up to a negative 35-point penalty on future LIHTC applications for all parties involved in the ownership and/or management of the development(s) that are in non-compliance. The penalty points will be assessed in four funding rounds (generally two calendar years).
**Goal 5: Decrease the Loss of Housing Through Displacement and Eviction**

To move towards this goal, the State of Minnesota will identify opportunities to support preservation of Naturally Occurring Affordable Housing (NOAH) and other ways to mitigate the effects of displacement or evictions.

**Challenge 5.a. | Redevelopment displacing current renters of Naturally Occurring Affordable Housing (NOAH)**

NOAH properties reflect a large stock of homes that are affordable to lower income households and are without subsidy. Redevelopment of NOAH properties is displacing current residents, and is predominantly occurring in the Twin Cities Region. It is estimated that Minnesota is losing 2,000 units every year.

**Action: Continue support of the NOAH Impact Fund and partner with the Greater Minnesota Housing Fund to evaluate the effectiveness of the fund.**

Naturally occurring affordable housing (NOAH) is unsubsidized housing that is affordable to moderate- and low-income renters. An increasing number of naturally affordable rental developments are being converted to higher-market rents or are simply operated under poor management and in disrepair. These conditions threaten the stability of families and communities, and these impacts disproportionately impact persons of color and persons with disabilities. Minnesota Housing has joined with the Greater Minnesota Housing Fund to invest in the NOAH Impact Fund to finance the acquisition and preservation of naturally affordable class B and Class C rental housing in partnership with high performing owner-operators with the shared social goal of preserving affordability for the long term.

This year, Minnesota Housing nearly completed an initial $5 million investment and committed to an additional $5 million for the next phase of the fund.

**Action: Monitor state legislation regarding right of first refusal and opportunity to purchase measures for manufactured home parks (tenant purchase rights) and consider the next steps for Minnesota Housing related to the preservation of manufactured home parks to address critical infrastructure issues that limit preservation opportunities, or offset/replace opportunities that are no longer available.**

Minnesota Housing is in the process of awarding its first round of Manufactured Home Community Redevelopment Program infrastructure grants with $2 million from the Minnesota state legislature.

**Action: Other NOAH actions – NOAH Working Group**

A NOAH Working Group has been formed as a spin-off of the Interagency Stabilization Group. The group is an intergovernmental policy group focused on coordinating advocacy and funding efforts around the preservation of NOAH properties in the Twin Cities Metro Area. The group started meeting in the summer of 2020, and includes metro area cities, counties, The Metropolitan Council and intermediaries working on NOAH preservation. The first effort of the Working group has been to coordinate on NOAH data in order to have clear and consistent data.
(and methodology) about the number of NOAH properties and units in the Metro area. The group has also started a watchlist of NOAH properties that are or may be coming onto the market, in order to coordinate on preservation strategy and resources. This group will work to determine priority projects for preservation, as well as advocating for funding to help preserve NOAH properties.

Challenge 5.b. | Eviction filings negatively impact renters regardless of outcome
Evictions disproportionately impact households of color and Indigenous communities and even an eviction filing will raise ongoing barriers to accessing housing.

Action: Monitor work to define and limit predatory rental practices, including questionable eviction practices and poor conditions of rental units.

Minnesota Housing policy and community development staff are tracking and evaluating the work of local jurisdictions related to this, including in Minneapolis. Further work will be done in later years of the work plan. Through the Governor and Lt. Governor’s COVID-response workgroups, Minnesota Housing is also convening an interagency work group on Housing Stability whose work includes developing recommendations for eviction prevention strategies at the end of the peacetime emergency.

Action: Eviction Prevention Programming Activities

The Family Homeless Prevention and Assistance Program (FHPAP) and COVID-19 Housing Assistance Program provide financial assistance to households at risk of losing their housing.

Funds for the FHPAP are specifically targeted to households most at risk of eviction, such as households who will lose their housing within 14-30 days. From July 1, 2019 to June 30, 2020, FHPAP provided 2,578 households with assistance to prevent the loss of housing.

The COVID-19 Housing Assistance Program launched August 24, 2020 and has the same intent to prevent the loss of housing. It is anticipated that 30,000 households will be served from August, 2020-December, 2020.

The 2016 Wilder Homeless Survey established that households who are non-white are at greater risk of homelessness. From July 1, 2019-June 30, 2020, 54% of FHPAP households were non-white. Black and indigenous households were more likely to wait longer periods of time to achieve stable housing while in the program. This may indicate inequity in being able to access housing in the same amount of time as non-white households. For the COVID-19 Housing Assistance Program, 57% of the households who applied in the first month of the program were non-white. We will continue to collect and evaluate this data to make program improvements.

One asset of FHPAP and COVID-19 Housing Assistance Program is that they have staff who work with landlords to mitigate the housing emergency and prevent loss of housing. The programs are marketed to landlords as an option for assisting households prior to filing evictions. Many new landlord relationships have been successfully developed with grant administrators. In Clay County, landlords are reaching out to the FHPAP provider who also provides mediation. In Ramsey County, landlords are reaching out to the COVID-19 Housing Assistance Program provider before filing evictions. In St. Louis County and Anoka County, legal aid is part of the FHPAP program to assist households to mediate with landlords prior to eviction.
CR-40 - Monitoring 91.220 and 91.230

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

For the Small Cities Development Program (SCDP), DEED monitors each grantee through two monitoring methods conducted by SCDP staff – desk and on-site. Desk monitoring is conducted on an ongoing basis from the start of the grant until closeout. The SCDP staff representative reviews startup documents, policies and procedures, environmental documents, ongoing activities, disbursement requests, labor standards, annual reports/performance measurements, audits, final reporting, and closeouts reporting. On-Site monitoring is conducted by SCDP staff at least once during the term of the funding agreement. The State decides to conduct desk versus on-site monitoring based on cost and time evaluation. Follow-up monitoring may occur if there are significant findings of noncompliance with program requirements or if other administrative difficulties become apparent from reviews. Monitoring of economic development projects uses the same process as those established through the state of Minnesota's CDBG competitive program. Due to COVID-19 pandemic, staff have begun virtually monitoring grantees. All monitoring procedures remain the same.

DEED has developed a checklist to assist in the monitoring areas such as grant management; fair housing and equal opportunity employment; Davis Bacon Labor Standards; inspections and bidding; and contractor payments. Staff ascertain if the activities stated within the approved application are eligible activities and address federal objectives, and if adequate progress has been made by the grantee within the time stated in the funding agreement. Attached in IDIS is the SCDP Internal Monitoring Procedures.

For ESG: each year DHS program staff review all ESG grantees using a risk analysis tool created with technical assistance from HUD. The tool has four broad areas of analysis: 1) General agency information, e.g., previous monitoring results; 2) program operations, e.g., compliance and reporting issues; 3) fiscal operations; and 4) organization Board of Directors/Executive Management.

The tool allows DHS staff to determine if a grantee needs immediate attention or can receive a visit as part of regular monitoring. A regular monitoring rotation ensures grantees are monitored at least once every two years. Staff review a random selection of files for specific documentation of: homelessness, disability status, target population, on-going assessment, follow-up, and supportive services. Staff verify the full number of participants being served, timeliness and eligibility of grant expenditures, and eligibility of matching fund expenditures.

For HOME: Minnesota Housing monitors HOME rental properties for compliance, requiring owners to submit tenant income and rent information for review annually. Requirements include: 1) owners annual submission of a Deferred Loan Owner Certification and report of unit events, including income and rent certifications, in the Property Online Reporting Tool; and 2) property inspections at least as frequently as required by 24 CFR §92.504(d) for compliance with property standards and to verify the accuracy of information owners submitted.

On-site inspection consists of a review of administrative records as well as a physical inspection and tenant file review of 20% of the HOME-assisted units. Minnesota Housing typically inspects a minimum
of four HOME units (or all HOME units if property has four HOME units or less). If a property is found to be out of compliance, the owner receives notice of noncompliance. If noncompliance is not corrected within the allotted period, usually 30 days, the owner is given a 10-day grace period in which to address issues and, if any violations still remain, a failure to comply notice is sent with an additional 10-day correction period. If noncompliance remains uncorrected, possible action may be an extension of the effective period or calling the loan due.

For HOPWA, Minnesota Housing’s inspection of HOPWA properties includes a physical inspection of the property, tenant file review to confirm eligibility, and a HOPWA Development Review, which uses a checklist that covers: 1) whether there are service plans in place, 2) whether HOPWA residents receive the services offered to them, 3) if any adverse actions have been taken against residents since the last HOPWA review, 4) if residents who were terminated from the program were provided due process, and 5) if the property complies with audit and record retention requirements.

Requirements include: 1) owners annual submission of a Deferred Loan Owner Certification and report of unit events, including income and rent certifications, into the Property Online Reporting Tool; and 2) property inspections per Minnesota Housing Board-approved inspection cycle unless there have been compliance issues that require more frequent inspections. The inspection cycle is every three years for properties with $500,000 or more of deferred loan financing and every five years for deferred loan amounts less than $500,000, unless the property also received Low-Income Housing Tax Credits, in which case the property is inspected according to the tax credit schedule. If a property is found to be out of compliance, the owner receives a notice of noncompliance. If noncompliance is not corrected within the allotted period, usually 30 days, the owner is given a 10-day grace period in which to address issues and, if any violations still remain, a failure to comply notice is sent with an additional 10-day correction period. If noncompliance remains uncorrected, possible action may be an extension of the effective period or calling the loan due.

Monitoring of emergency rent and mortgage assistance includes: monthly review of administrative budget, production, and utilization of funding; evidence that the grantee is collecting appropriate demographic data; and biennial site visits to the grantee to review the following:

Policies and procedures
Compliance with audit and data practices requirements
Documentation of compliance with time limits for assistance
Documentation of all aspects of tenant eligibility
Documentation that each participant was provided an opportunity to receive case management services
Source documentation of rental, mortgage, or utility expense

**Description of the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.**

The state notified the public of the availability of the draft the State Register and through state social media outlets and eNews, including to organizations and partners that work directly with minorities, non-English speaking persons and persons with disabilities. For example, per our Citizen Participation Plan, we reach out to a wide network of councils and coalitions focusing on specific populations, including the Council on Asian Pacific Minnesotans, Central Cultural Chicano, CLUES, Council for Minnesotans of African Heritage, Minnesota Council on Latino Affairs, and the Upper Midwest American
Indian Center. In addition, our eNews distribution includes an extensive network of providers for persons with disabilities, through the Olmstead Implementation Office currently located at Minnesota Housing. The draft CAPER for 2020 was available for public comment for 18 days beginning November 13, 2020 and extending through the close of the business day on November 30, 2020. Minnesota Housing and DEED posted copies of the CAPER on their websites and hard copies were available from Minnesota Housing, DEED, and DHS upon request. The electronic copies of the CAPER we created were fully accessible documents suitable for screen readers.

Public input into the draft CAPER is considered in preparing the final report to HUD and the state responds in writing to each commenter. Six public comment letter/emails were received on the 2020 CAPER draft.

**CR-45 - CDBG 91.520(c)**

Specify the nature of, and reasons for, any changes in the jurisdiction’s program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

The state does not plan on changing its objectives. Our experiences indicate that requests for DEED’s CDBG funds are twice as much as our allocation. Therefore we think our objectives align with the interest shown.

<table>
<thead>
<tr>
<th>Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?</th>
<th>No</th>
</tr>
</thead>
</table>

[BEDI grantees] Describe accomplishments and program outcomes during the last year.

**CR-50 - HOME 91.520(e)**

Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations.

Please list those projects that should have been inspected on-site this program year based upon the schedule in §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

Minnesota Housing has used past HOME allocations to fund down payment assistance to first-time homebuyers, rehabilitation loans to homeowners, and rehabilitation loans to owners of rental property. Currently, based on the critical need to both preserve existing affordable rental housing and develop new housing to meet a very large gap in the availability of affordable housing, all HOME funds have been allocated to fund rental housing activities, including rehabilitation and new construction.

In 2018, Minnesota Housing realigned its HOME inspections to be conducted once every three years in accordance with the 2013 HOME rule. Current HUD guidance allows PJ’s to complete the 2020 on-site inspection no later than 120 days after January 1, 2021. Minnesota Housing urges HUD to extend this relief for at least six additional months or relieve PJ’s from the requirement to conduct 2020 physical inspections altogether as IRS did for LIHTC properties.

Minnesota Housing did or will conduct a remote review of administrative records and tenant files for properties due to be inspected in 2020. The following table lists results of the nine remote reviews
already completed in 2020 and notes the four that are currently in process and the four that are scheduled but not yet started. The table also notes the seven (7) properties whose HOME affordability period ended in FFY2020.

Among the remote reviews already completed (representing 312 HOME units), only three units were found to be in violation of program standards, and these violations have been or are in the process of being clarified or corrected.

With respect to Violence Against Women Reauthorization Act of 2013, Minnesota Housing implemented the final rule of VAWA, promulgated in 2016 and effective December 16, 2016. For HOME (and National Housing Trust Fund) properties, this implementation included: 1) notice of occupancy rights and certification forms distributed at appropriate times, and 2) the development and adoption of an emergency transfer plan (found here: Minnesota Housing Finance Agency Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking). Policies and procedures were put in place to ensure privacy and data security for reporting of VAWA transfer requests and results. For FFY 2020, there were no transfer requests made.
### Inspection Date Range: 1/1/2020 to 12/31/2020

<table>
<thead>
<tr>
<th>Property Number</th>
<th>Property Name</th>
<th>City</th>
<th>Total HOME Units</th>
<th>IDIS Number</th>
<th>Compliance End Date</th>
<th>No Longer Monitored Date</th>
<th>No Longer Monitored Reason</th>
<th>Date of Physical Inspection</th>
<th>Date of File Review</th>
<th>Compliance Status</th>
<th># of units with violations</th>
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<tbody>
<tr>
<td>D0012</td>
<td>Northbridge Apartments</td>
<td>Albert Lea</td>
<td>26</td>
<td>8936</td>
<td>2/6/2024</td>
<td></td>
<td></td>
<td>On-site inspection delayed due to COVID</td>
<td>Tenant files due for review on 10/22/2020</td>
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<td>D0216</td>
<td>College Drive Townhouses</td>
<td>Brainerd</td>
<td>20</td>
<td>5656</td>
<td>9/30/2019</td>
<td>9/30/2019</td>
<td>Compliance obligations successfully fulfilled for full term</td>
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<td></td>
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<tr>
<td>D0232</td>
<td>Unity Place</td>
<td>Brooklyn Center</td>
<td>98</td>
<td>8339</td>
<td>7/10/2024</td>
<td></td>
<td></td>
<td>On-site inspection delayed due to COVID</td>
<td>8/10/2020</td>
<td>Two tenant file violations and one potential over rent. Correction in process.</td>
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<td>D0246</td>
<td>Woodmere Apartments</td>
<td>Buffalo</td>
<td>54</td>
<td>7043</td>
<td>1/9/2023</td>
<td></td>
<td></td>
<td>On-site inspection delayed due to COVID</td>
<td>7/16/2020</td>
<td>No findings</td>
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<td>D0419</td>
<td>The Crossroads</td>
<td>Dodge Center</td>
<td>37</td>
<td>5596</td>
<td>4/28/2020</td>
<td>7/14/2020</td>
<td>Compliance obligations successfully fulfilled for full term</td>
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<td>D0489</td>
<td>Yorkdale Townhomes</td>
<td>Edina</td>
<td>22</td>
<td>8933</td>
<td>11/13/2028</td>
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<td>D0665</td>
<td>Jackson Family Housing</td>
<td>Jackson</td>
<td>12</td>
<td></td>
<td>8/8/2021</td>
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<td></td>
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<td>D0703</td>
<td>Edgewood Townhomes (fka Groveland Estates)</td>
<td>Litchfield</td>
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<td>7115</td>
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<td></td>
<td></td>
<td>On-site inspection delayed due to COVID</td>
<td>7/14/2020</td>
<td>No findings</td>
<td></td>
</tr>
<tr>
<td>Property Number</td>
<td>Property Name</td>
<td>City</td>
<td>Total HOME Units</td>
<td>IDIS Number</td>
<td>Compliance End Date</td>
<td>No Longer Monitored Date</td>
<td>No Longer Monitored Reason</td>
<td>Date of Physical Inspection</td>
<td>Date of File Review</td>
<td>Compliance Status</td>
<td># of units with violations</td>
</tr>
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</tr>
<tr>
<td>D0714</td>
<td>Stone Creek Townhomes</td>
<td>Luverne</td>
<td>19</td>
<td>5567</td>
<td>5/20/2020</td>
<td>6/9/2020</td>
<td>Compliance obligations successfully fulfilled for full term</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>D0734</td>
<td>Gus Johnson Plaza</td>
<td>Mankato</td>
<td>26</td>
<td>9345</td>
<td>3/16/2026</td>
<td></td>
<td>On-site inspection delayed due to COVID</td>
<td>In process</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>D0854</td>
<td>Seward Square</td>
<td>Minneapolis</td>
<td>19</td>
<td>9238</td>
<td>4/22/2025</td>
<td></td>
<td>Compliance obligations successfully fulfilled for full term</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>D1048</td>
<td>Westgate-New Prague</td>
<td>New Prague</td>
<td>36</td>
<td>5868</td>
<td>8/19/2020</td>
<td>8/19/2020</td>
<td>On-site inspection delayed due to COVID</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>D1130</td>
<td>Storybrook Apartments</td>
<td>Pipestone</td>
<td>12</td>
<td>8231</td>
<td>8/9/2023</td>
<td></td>
<td>7/15/2020</td>
<td>No findings</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>D1194</td>
<td>Jordan Tower II</td>
<td>Red Wing</td>
<td>86</td>
<td>9850</td>
<td>12/10/2039</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>D1350</td>
<td>Bandel Hills TH</td>
<td>Rochester</td>
<td>11</td>
<td>5/3/2026</td>
<td></td>
<td></td>
<td>On-site inspection delayed due to COVID</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>D1552</td>
<td>Lewis Park Apartments</td>
<td>Saint Paul</td>
<td>63</td>
<td>9239</td>
<td>5/9/2025</td>
<td></td>
<td>7/22/2020</td>
<td>No findings</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>D1886</td>
<td>Three Rivers Duplexes</td>
<td>Northfield</td>
<td>8</td>
<td></td>
<td>12/31/2026</td>
<td></td>
<td>On-site inspection delayed due to COVID</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>D1893</td>
<td>Fisher Townhomes</td>
<td>Fisher</td>
<td>10</td>
<td></td>
<td>11/21/2030</td>
<td></td>
<td>In process</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Property Number</td>
<td>Property Name</td>
<td>City</td>
<td>Total HOME Units</td>
<td>IDIS Number</td>
<td>Compliance End Date</td>
<td>No Longer Monitored Date</td>
<td>No Longer Monitored Reason</td>
<td>Date of Physical Inspection</td>
<td>Date of File Review</td>
<td>Compliance Status</td>
<td># of units with violations</td>
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</tr>
<tr>
<td>D2391</td>
<td>West Birch Townhomes</td>
<td>Princeton</td>
<td>8</td>
<td></td>
<td>10/12/2028</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>On-site inspection delayed due to COVID</td>
<td></td>
</tr>
<tr>
<td>D2393</td>
<td>Ridgeview Court Townhomes</td>
<td>Paynesville</td>
<td>8</td>
<td></td>
<td>11/1/2028</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>On-site inspection delayed due to COVID</td>
<td></td>
</tr>
<tr>
<td>D2521</td>
<td>Broadway Apartments -- (Crookston)</td>
<td>Crookston</td>
<td>12</td>
<td></td>
<td>10/14/2019</td>
<td>10/14/2019</td>
<td>Compliance obligations successfully fulfilled for full term</td>
<td></td>
<td></td>
<td>On-site inspection delayed due to COVID</td>
<td></td>
</tr>
<tr>
<td>D3370</td>
<td>Ebenezer Tower</td>
<td>Minneapolis</td>
<td>43</td>
<td>9344</td>
<td>7/1/2031</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>In process</td>
<td></td>
</tr>
<tr>
<td>D3435</td>
<td>Country Village Apts</td>
<td>Redwood Falls</td>
<td>33</td>
<td>5565</td>
<td>8/22/2019</td>
<td>12/5/2019</td>
<td>Compliance obligations successfully fulfilled for full term</td>
<td></td>
<td></td>
<td>On-site inspection delayed due to COVID</td>
<td></td>
</tr>
<tr>
<td>D3468</td>
<td>Como By The Lake</td>
<td>Saint Paul</td>
<td>24</td>
<td>10068</td>
<td>10/22/2033</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>On-site inspection delayed due to COVID</td>
<td>Tenant files due for review on 10/9/2020</td>
</tr>
<tr>
<td>D3475</td>
<td>Maryland Park</td>
<td>Saint Paul</td>
<td>32</td>
<td>9381</td>
<td>1/5/2026</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>On-site inspection delayed due to COVID</td>
<td></td>
</tr>
<tr>
<td>Property Number</td>
<td>Property Name</td>
<td>City</td>
<td>Total HOME Units</td>
<td>IDIS Number</td>
<td>Compliance End Date</td>
<td>No Longer Monitored Date</td>
<td>No Longer Monitored Reason</td>
<td>Date of Physical Inspection</td>
<td>Date of File Review</td>
<td>Compliance Status</td>
<td># of units with violations</td>
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</tr>
<tr>
<td>D3524</td>
<td>Morningside Terrace / Bluff View Flats</td>
<td>Winona</td>
<td>26</td>
<td>9709</td>
<td>4/5/2027</td>
<td></td>
<td></td>
<td>On-site inspection delayed due to COVID</td>
<td>9/3/2020</td>
<td>No findings</td>
<td></td>
</tr>
<tr>
<td>D3787</td>
<td>New San Marco Apartments</td>
<td>Duluth</td>
<td>6</td>
<td>4944</td>
<td>6/4/2028</td>
<td></td>
<td></td>
<td>On-site inspection delayed due to COVID</td>
<td>8/25/2020</td>
<td>No findings</td>
<td></td>
</tr>
<tr>
<td>D6401</td>
<td>River Valley Apartments</td>
<td>Wabasha</td>
<td>24</td>
<td>5881</td>
<td>5/25/2020</td>
<td>9/16/2020</td>
<td>Compliance obligations successfully fulfilled for full term</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>D7586</td>
<td>Minneapolis Portfolio Preservation (MP3)</td>
<td>Minneapolis</td>
<td>183</td>
<td>9577</td>
<td>1/21/2027</td>
<td></td>
<td></td>
<td>On-site inspection delayed due to COVID</td>
<td></td>
<td>Tenant files due for review on 10/16/2020</td>
<td></td>
</tr>
<tr>
<td>D7713</td>
<td>Seward Towers East and West</td>
<td>Minneapolis</td>
<td>122</td>
<td>9710</td>
<td>8/4/2027</td>
<td></td>
<td></td>
<td>On-site inspection delayed due to COVID</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>D7717</td>
<td>Solace Apartments</td>
<td>Saint Peter</td>
<td>16</td>
<td>9711</td>
<td>6/25/2049</td>
<td></td>
<td></td>
<td>On-site inspection delayed due to COVID</td>
<td>9/10/2020</td>
<td>No findings</td>
<td></td>
</tr>
<tr>
<td>D7718</td>
<td>Maplewood Apartments</td>
<td>Saint Peter</td>
<td>24</td>
<td>9711</td>
<td>5/4/2032</td>
<td></td>
<td></td>
<td>On-site inspection delayed due to COVID</td>
<td></td>
<td>Tenant files due for review on 10/22/2020</td>
<td></td>
</tr>
<tr>
<td>D7858</td>
<td>Riverview Apartments &amp; Hilltop Villas</td>
<td>Sebeka</td>
<td>23</td>
<td>9851</td>
<td>2/3/2034</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>D7963</td>
<td>Amorce II</td>
<td>Robbinsdale</td>
<td>32</td>
<td>9958</td>
<td>4/2/2034</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 92.351(b)

Minnesota Housing has provided a HOME Compliance Guide to owners and management agents of each HOME-assisted rental property. The guide covers all HOME compliance issues including leases, rents, incomes, maintaining unit mix, affirmative marketing, and property standards.

Minnesota Housing’s guides for lending or development promote and require compliance with fair housing laws and regulations. Minnesota Housing requires Affirmative Fair Housing Marketing Plans for the marketing and occupancy of assisted units in developments of five units or more. Owners are required to review Affirmative Fair Housing Marketing Plans every one to two years, and as part of its inspection procedures, Minnesota Housing will review to determine if updates are needed.

According to HUD’s HOME Summary of Accomplishments, in HOME projects completed in FFY 2020, 63% of householders were of a race other than white and 0% were of Hispanic ethnicity. According the Census Bureau's American Community Survey, 2019, an estimated 19% of Minnesota's low and moderate income households are of a race other than white and 5% are of Hispanic ethnicity.

Note that HOME funds historically were available primarily in non-entitlement areas, which are less diverse and may have limited previous opportunity for HOME-funded projects to serve a higher percentage of people of color or Hispanic ethnicity. This year’s accomplishments reflects the completion of one HOME properties totaling 24 units.

Refer to IDIS reports to describe the amount and use of program income for projects, including the number of projects and owner and tenant characteristics

Minnesota Housing does not separately track activities (or parts of activities) that are funded with program income, which the agency uses in accordance with grant specific accounting and which may be used simultaneously with new grant funds. Tracking project, owner, and/or tenant characteristics separately is impossible; however, since program income is not used for purposes different from entitlement funds, characteristics presumably would be the same as entitlement-funded activities.

Describe other actions taken to foster and maintain affordable housing. 91.220(k) (STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 91.320(j)

Minnesota Housing requests funding proposals from housing sponsors under a consolidated application process. The agency combines tax credits with amortizing mortgages and deferred loans using state appropriations, agency resources, and contributions from funding partners to make tax credit developments more affordable to lower income households.

Based on an assessment of local housing needs, Minnesota Housing has developed and updates a tax credit allocation plan that gives preference to certain types of development, e.g., those that serve the lowest income households and the high-priority homeless, and those that preserve federally assisted housing, and/or provide increased geographic choice. The state’s most recent Qualified Allocation Plan and priorities for housing tax credit allocation may be viewed at: Tax Credits

In 2019, Minnesota Housing awarded housing tax credits in the amount of $12.1 million that resulted in total of 695 affordable rental units; and suballocators allocated an additional $3.5 million in tax credits for 398 units.
CR-55 - HOPWA 91.520(e)
Identify the number of individuals assisted and the types of assistance provided

Table for report on the one-year goals for the number of households provided housing through the use of HOPWA activities for: short-term rent, mortgage, and utility assistance payments to prevent homelessness of the individual or family; tenant-based rental assistance; and units provided in housing facilities developed, leased, or operated with HOPWA funds.

<table>
<thead>
<tr>
<th>Number of Households Served Through:</th>
<th>One-year Goal</th>
<th>Actual</th>
</tr>
</thead>
<tbody>
<tr>
<td>Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family</td>
<td>200</td>
<td>177</td>
</tr>
<tr>
<td>Tenant-based rental assistance</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Table 14 – HOPWA Number of Households Served

Narrative

The state provided housing assistance to 177 households through the use of HOPWA funds for short-term rent, mortgage, and utility assistance payments to prevent homelessness for an individual or family. The five-year plan projected 200 households be served with HOPWA funds in 2019. The five year goal for HOPWA is to serve 1,100 households and is based upon HUD projections for Minnesota through formula modernization, which will be phased in over a five year period.

Since 1999, Minnesota Housing has received an annual allocation of HOPWA funds from HUD to provide housing assistance and support services to people outside the 13-county Twin Cities metro area (which is served through a grant to the City of Minneapolis). Minnesota Housing and the Department of Human Services collaborate to undertake outreach efforts to help meet the needs of people with HIV/AIDS living in Greater Minnesota. This collaboration allows for greater coordination in the implementation of HIV/AIDS related projects.

Minnesota Housing received $252,520 in HOPWA funds in FFY 2020 and committed this HOPWA funding to JustUs Health, formerly known as the Minnesota AIDS Project (MAP). JustUs Health has established statewide networks to deliver assistance in areas of need throughout Greater Minnesota. JustUs Health’s Greater Minnesota emergency housing assistance program has worked closely with HIV service providers in Greater Minnesota, including the Mayo Clinic’s HIV Clinic and Social Services, the Rural AIDS Action Network, and JustUs Health’s own case management program in Duluth.

Using HOPWA assistance, JustUS Health provides short-term rent, mortgage, and utility assistance to prevent the homelessness of eligible individuals or families.
CR-56 – HTF NEW SECTION
Describe the extent to which the grantee complied with its approved HTF allocation plan and the requirements of 24 CFR part 93.

<table>
<thead>
<tr>
<th>Tenure Type</th>
<th>0 – 30% AMI</th>
<th>0% of 30+ to poverty line (when poverty line is higher than 30% AMI)</th>
<th>% of the higher of 30+ AMI or poverty line to 50% AMI</th>
<th>Total Occupied Units</th>
<th>Units Completed, Not Occupied</th>
<th>Total Completed Units</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rental</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Homebuyer</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

Table 15 - CR-56 HTF Units in HTF activities completed during the period

Narrative
The second National Housing Trust Fund project that Minnesota Housing has funded through this program did not reach completion prior to the end of the Federal Fiscal Year. We will report on Park 7 in the 2021 Action Plan.
CR-60 - ESG 91.520(g) (ESG Recipients only)

ESG Supplement to the CAPER in e-snaps

For Paperwork Reduction Act

1. Recipient Information—All Recipients Complete

   Basic Grant Information

   Recipient Name: MINNESOTA
   Organizational DUNS Number: 804832640
   EIN/TIN Number: 411599130
   Identify the Field Office: MINNEAPOLIS
   Identify CoC(s) in which the recipient or subrecipient(s) will provide ESG assistance: Minneapolis/Hennepin County CoC

   ESG Contact Name
   - Prefix: Mr
   - First Name: ISAAC
   - Middle Name: D
   - Last Name: WENGERD
   - Suffix: 0
   - Title: Agency Policy Specialist

   ESG Contact Address
   - Street Address 1: MN Dept Human Services
   - Street Address 2: 444 Lafayette St.
   - City: St. Paul
   - State: MN
   - ZIP Code: 55164-
   - Phone Number: 6514313815
   - Extension: 0
   - Fax Number: 6514317309
   - Email Address: ISAAC.WENGERD@STATE.MN.US

   ESG Secondary Contact
   - Prefix
   - First Name
   - Last Name
   - Suffix
   - Title
   - Phone Number
   - Extension
   - Email Address

2. Reporting Period—All Recipients Complete
Program Year Start Date: 10/01/2019
Program Year End Date: 09/30/2020

3a. Subrecipient Form – Complete one form for each subrecipient

Subrecipient or Contractor Name: MINNESOTA
City: Saint Paul
State: MN
Zip Code: 55101, 1938
DUNS Number: 804832640
Is subrecipient a victim services provider: N
Subrecipient Organization Type: Unit of Government
ESG Subgrant or Contract Award Amount: 106,357

Subrecipient or Contractor Name: THREE RIVERS COMMUNITY ACTION COUNCIL
City: Zumbrota
State: MN
Zip Code: 55992, 0157
DUNS Number:
Is subrecipient a victim services provider: N
Subrecipient Organization Type: Other Non-Profit Organization
ESG Subgrant or Contract Award Amount: 70000

Subrecipient or Contractor Name: WEST CENTRAL MINNESOTA COMMUNITIES
City: ELBOW LAKE
State: MN
Zip Code: 56531,
DUNS Number:
Is subrecipient a victim services provider: N
Subrecipient Organization Type: Other Non-Profit Organization
ESG Subgrant or Contract Award Amount: 42500

Subrecipient or Contractor Name: KOOTASCA COMMUNITY ACTION, INC.
City: Grand Rapids
State: MN
Zip Code: 55744, 3982
DUNS Number:
Is subrecipient a victim services provider: N
Subrecipient Organization Type: Other Non-Profit Organization
ESG Subgrant or Contract Award Amount: 30000

60
Subrecipient or Contractor Name: LAKES AND PRAIRIES COMMUNITY ACTION PARTNERSHIPS  
City: Moorhead  
State: MN  
Zip Code: 56560, 2083  
DUNS Number: 039375647  
Is subrecipient a victim services provider: N  
Subrecipient Organization Type: Other Non-Profit Organization  
ESG Subgrant or Contract Award Amount: 100000

Subrecipient or Contractor Name: RED LAKE HOMELESS SHELTER, INC  
City: Redlake  
State: MN  
Zip Code: 56671, 0280  
DUNS Number: 623149254  
Is subrecipient a victim services provider: N  
Subrecipient Organization Type: Other Non-Profit Organization  
ESG Subgrant or Contract Award Amount: 72500

Subrecipient or Contractor Name: SCOTT CARVER DAKOTA CAP  
City: Shakopee  
State: MN  
Zip Code: 55379, 1840  
DUNS Number: 085104610  
Is subrecipient a victim services provider: N  
Subrecipient Organization Type: Other Non-Profit Organization  
ESG Subgrant or Contract Award Amount: 186881

Subrecipient or Contractor Name: Churches United for the Homeless  
City: Moorhead  
State: MN  
Zip Code: 56560, 2307  
DUNS Number: 364422857  
Is subrecipient a victim services provider: N  
Subrecipient Organization Type: Faith-Based Organization  
ESG Subgrant or Contract Award Amount: 175000

Subrecipient or Contractor Name: Mahube-Otwa Community Action Partnership  
City: Detroit Lakes  
State: MN  
Zip Code: 56501, 2722  
DUNS Number: 037473071  
Is subrecipient a victim services provider: N  
Subrecipient Organization Type: Other Non-Profit Organization  
ESG Subgrant or Contract Award Amount: 80000
Subrecipient or Contractor Name: Partners for Affordable Housing
City: Mankato
State: MN
Zip Code: 56001, 4430
DUNS Number: 015129260
Is subrecipient a victim services provider: N
Subrecipient Organization Type: Other Non-Profit Organization
ESG Subgrant or Contract Award Amount: 42465

Subrecipient or Contractor Name: Salvation Army - St. Cloud
City: Saint Cloud
State: MN
Zip Code: 56304, 1247
DUNS Number: 002805922
Is subrecipient a victim services provider: N
Subrecipient Organization Type: Faith-Based Organization
ESG Subgrant or Contract Award Amount: 100000

Subrecipient or Contractor Name: Semcac
City: Rushford
State: MN
Zip Code: 55971, 8812
DUNS Number: 066860073
Is subrecipient a victim services provider: N
Subrecipient Organization Type: Other Non-Profit Organization
ESG Subgrant or Contract Award Amount: 28000

Subrecipient or Contractor Name: Grace House of Itasca County
City: Grand Rapids
State: MN
Zip Code: 55744, 3835
DUNS Number: 799149344
Is subrecipient a victim services provider: N
Subrecipient Organization Type: Faith-Based Organization
ESG Subgrant or Contract Award Amount: 85000

Subrecipient or Contractor Name: Institute for Community Alliances
City: Minneapolis
State: MN
Zip Code: 55404,
DUNS Number: 046826826
Is subrecipient a victim services provider: N
Subrecipient Organization Type: Other Non-Profit Organization
ESG Subgrant or Contract Award Amount: 75000
Subrecipient or Contractor Name: A Place for You
City: Pine City
State: MN
Zip Code: 55063, 1530
DUNS Number: 758511277
Is subrecipient a victim services provider: N
Subrecipient Organization Type: Other Non-Profit Organization
ESG Subgrant or Contract Award Amount: 70,000

Subrecipient or Contractor Name: Servants of Shelter of Koochiching County
City: International Falls
State: MN
Zip Code: 56649, 2241
DUNS Number: 079386356
Is subrecipient a victim services provider: N
Subrecipient Organization Type: Faith-Based Organization
ESG Subgrant or Contract Award Amount: 52,500

Subrecipient or Contractor Name: Arrowhead Economic Opportunity Agency
City: Virginia
State: MN
Zip Code: 55792, 2776
DUNS Number: 082523713
Is subrecipient a victim services provider: N
Subrecipient Organization Type: Other Non-Profit Organization
ESG Subgrant or Contract Award Amount: 87,500

Subrecipient or Contractor Name: Inter-County Community Council, Inc.
City: Oklee
State: MN
Zip Code: 56742, 0189
DUNS Number: 964802607
Is subrecipient a victim services provider: N
Subrecipient Organization Type: Other Non-Profit Organization
ESG Subgrant or Contract Award Amount: 37,500

Subrecipient or Contractor Name: New Pathways
City: Cambridge
State: MN
Zip Code: 55008, 1519
DUNS Number: 044054570
Is subrecipient a victim services provider: N
Subrecipient Organization Type: Other Non-Profit Organization
ESG Subgrant or Contract Award Amount: 51,750
Subrecipient or Contractor Name: Ours to Serve House of Hospitality, Inc.
City: Bemidji
State: MN
Zip Code: 56601, 2925
DUNS Number: 962478096
Is subrecipient a victim services provider: N
Subrecipient Organization Type: Other Non-Profit Organization
ESG Subgrant or Contract Award Amount: 100000

Subrecipient or Contractor Name: Prairie Five CAC
City: Montevideo
State: MN
Zip Code: 56265, 1352
DUNS Number: 055557813
Is subrecipient a victim services provider: N
Subrecipient Organization Type: Other Non-Profit Organization
ESG Subgrant or Contract Award Amount: 40000

Subrecipient or Contractor Name: Salvation Army Brainerd
City: Brainerd
State: MN
Zip Code: 56401, 3506
DUNS Number: 081033115
Is subrecipient a victim services provider: N
Subrecipient Organization Type: Faith-Based Organization
ESG Subgrant or Contract Award Amount: 12000

Subrecipient or Contractor Name: Salvation Army Rochester
City: Rochester
State: MN
Zip Code: 55906, 3706
DUNS Number: 125485958
Is subrecipient a victim services provider: N
Subrecipient Organization Type: Faith-Based Organization
ESG Subgrant or Contract Award Amount: 106000

Subrecipient or Contractor Name: Bi-County Community Action Program, Inc.
City: Bemidji
State: MN
Zip Code: 56601, 8669
DUNS Number: 087682670
Is subrecipient a victim services provider: N
Subrecipient Organization Type: Other Non-Profit Organization
ESG Subgrant or Contract Award Amount: 45,000
**CR-65 - Persons Assisted**

4. Persons Served

4a. Complete for Homelessness Prevention Activities

<table>
<thead>
<tr>
<th>Number of Persons in Households</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Adults</td>
<td>0</td>
</tr>
<tr>
<td>Children</td>
<td>0</td>
</tr>
<tr>
<td>Don't Know/Refused/Other</td>
<td>0</td>
</tr>
<tr>
<td>Missing Information</td>
<td>0</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>0</strong></td>
</tr>
</tbody>
</table>

Table 15 – Household Information for Homeless Prevention Activities

4b. Complete for Rapid Re-Housing Activities

<table>
<thead>
<tr>
<th>Number of Persons in Households</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Adults</td>
<td>0</td>
</tr>
<tr>
<td>Children</td>
<td>0</td>
</tr>
<tr>
<td>Don't Know/Refused/Other</td>
<td>0</td>
</tr>
<tr>
<td>Missing Information</td>
<td>0</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>0</strong></td>
</tr>
</tbody>
</table>

Table 16 – Household Information for Rapid Re-Housing Activities

4c. Complete for Shelter

<table>
<thead>
<tr>
<th>Number of Persons in Households</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Adults</td>
<td>0</td>
</tr>
<tr>
<td>Children</td>
<td>0</td>
</tr>
<tr>
<td>Don't Know/Refused/Other</td>
<td>0</td>
</tr>
<tr>
<td>Missing Information</td>
<td>0</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>0</strong></td>
</tr>
</tbody>
</table>

Table 17 – Shelter Information
4d. Street Outreach

<table>
<thead>
<tr>
<th>Number of Persons in Households</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Adults</td>
<td>0</td>
</tr>
<tr>
<td>Children</td>
<td>0</td>
</tr>
<tr>
<td>Don't Know/Refused/Other</td>
<td>0</td>
</tr>
<tr>
<td>Missing Information</td>
<td>0</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>0</strong></td>
</tr>
</tbody>
</table>

Table 18 – Household Information for Street Outreach

4e. Totals for all Persons Served with ESG

<table>
<thead>
<tr>
<th>Number of Persons in Households</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Adults</td>
<td>0</td>
</tr>
<tr>
<td>Children</td>
<td>0</td>
</tr>
<tr>
<td>Don't Know/Refused/Other</td>
<td>0</td>
</tr>
<tr>
<td>Missing Information</td>
<td>0</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>0</strong></td>
</tr>
</tbody>
</table>

Table 19 – Household Information for Persons Served with ESG

5. Gender—Complete for All Activities

<table>
<thead>
<tr>
<th></th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Male</td>
<td>0</td>
</tr>
<tr>
<td>Female</td>
<td>0</td>
</tr>
<tr>
<td>Transgender</td>
<td>0</td>
</tr>
<tr>
<td>Don't Know/Refused/Other</td>
<td>0</td>
</tr>
<tr>
<td>Missing Information</td>
<td>0</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>0</strong></td>
</tr>
</tbody>
</table>

Table 20 – Gender Information
6. Age—Complete for All Activities

<table>
<thead>
<tr>
<th>Age Group</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Under 18</td>
<td>0</td>
</tr>
<tr>
<td>18-24</td>
<td>0</td>
</tr>
<tr>
<td>25 and over</td>
<td>0</td>
</tr>
<tr>
<td>Don't Know/Refused/Other</td>
<td>0</td>
</tr>
<tr>
<td>Missing Information</td>
<td>0</td>
</tr>
<tr>
<td>Total</td>
<td>0</td>
</tr>
</tbody>
</table>

Table 21 – Age Information

7. Special Populations Served—Complete for All Activities

<table>
<thead>
<tr>
<th>Subpopulation</th>
<th>Total</th>
<th>Total Persons Served – Prevention</th>
<th>Total Persons Served – RRH</th>
<th>Total Persons Served in Emergency Shelters</th>
</tr>
</thead>
<tbody>
<tr>
<td>Veterans</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Victims of Domestic Violence</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Elderly</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>HIV/AIDS</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Chronically Homeless</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td><strong>Persons with Disabilities:</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Severely Mentally Ill</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Chronic Substance Abuse</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Other Disability</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Total (Unduplicated if possible)</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

Table 22 – Special Population Served
CR-70 – ESG 91.520(g) - Assistance Provided and Outcomes

8. Shelter Utilization

<table>
<thead>
<tr>
<th>Number of New Units - Rehabbed</th>
<th>0</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of New Units - Conversion</td>
<td>0</td>
</tr>
<tr>
<td>Total Number of bed-nights available</td>
<td>392,523</td>
</tr>
<tr>
<td>Total Number of bed-nights provided</td>
<td>363,887</td>
</tr>
<tr>
<td>Capacity Utilization</td>
<td>92.7%</td>
</tr>
</tbody>
</table>

Table 23 – Shelter Capacity

9. Project Outcomes Data measured under the performance standards developed in consultation with the CoC(s)

SHELTER GOAL

GOAL: 9,300 individuals in households receiving safe, adequate emergency shelter. OUTCOME: 9,489

The goal of sheltering 9,300 individuals was achieved.

PREVENTION/RAPID RE-HOUSING GOALS

GOAL: 450 persons are stably re-housed.

The goal of stably re-housing 450 persons in households (total for prevention and rapid re-housing) was not achieved, as 259 persons achieved this outcome in 2020
CR-75 – Expenditures

11. Expenditures

11a. ESG Expenditures for Homelessness Prevention

<table>
<thead>
<tr>
<th>Expenditures for Rental Assistance</th>
<th>2018</th>
<th>2019</th>
<th>2020</th>
</tr>
</thead>
<tbody>
<tr>
<td>Expenditures for Housing Relocation and Stabilization Services - Financial Assistance</td>
<td>0</td>
<td>0</td>
<td>40,203</td>
</tr>
<tr>
<td>Expenditures for Housing Relocation &amp; Stabilization Services - Services</td>
<td>0</td>
<td>0</td>
<td>20,147</td>
</tr>
<tr>
<td>Expenditures for Homeless Prevention under Emergency Shelter Grants Program</td>
<td>0</td>
<td>0</td>
<td>149,044</td>
</tr>
</tbody>
</table>

**Subtotal Homelessness Prevention**

| 0    | 0    | 209,394 |

Table 24 – ESG Expenditures for Homelessness Prevention

11b. ESG Expenditures for Rapid Re-Housing

<table>
<thead>
<tr>
<th>Expenditures for Rental Assistance</th>
<th>2018</th>
<th>2019</th>
<th>2020</th>
</tr>
</thead>
<tbody>
<tr>
<td>Expenditures for Housing Relocation and Stabilization Services - Financial Assistance</td>
<td>0</td>
<td>0</td>
<td>175,563</td>
</tr>
<tr>
<td>Expenditures for Housing Relocation &amp; Stabilization Services - Services</td>
<td>0</td>
<td>0</td>
<td>31,450</td>
</tr>
<tr>
<td>Expenditures for Homeless Assistance under Emergency Shelter Grants Program</td>
<td>0</td>
<td>0</td>
<td>235,193</td>
</tr>
</tbody>
</table>

**Subtotal Rapid Re-Housing**

| 0    | 0    | 442,206 |

Table 25 – ESG Expenditures for Rapid Re-Housing

11c. ESG Expenditures for Emergency Shelter

<table>
<thead>
<tr>
<th>Essential Services</th>
<th>2018</th>
<th>2019</th>
<th>2020</th>
</tr>
</thead>
<tbody>
<tr>
<td>Operations</td>
<td>0</td>
<td>0</td>
<td>697,520</td>
</tr>
<tr>
<td>Renovation</td>
<td>0</td>
<td>0</td>
<td>487,709</td>
</tr>
<tr>
<td>Major Rehab</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Conversion</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

**Subtotal**

| 0    | 0    | 1,185,229 |

Table 26 – ESG Expenditures for Emergency Shelter
### 11d. Other Grant Expenditures

<table>
<thead>
<tr>
<th></th>
<th>2018</th>
<th>2019</th>
<th>2020</th>
</tr>
</thead>
<tbody>
<tr>
<td>Street Outreach</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>HMIS</td>
<td>0</td>
<td>0</td>
<td>18,184</td>
</tr>
<tr>
<td>Administration</td>
<td>0</td>
<td>0</td>
<td>157,951</td>
</tr>
</tbody>
</table>

Table 27 - Other Grant Expenditures

### 11e. Total ESG Grant Funds

<table>
<thead>
<tr>
<th>Total ESG Funds Expended</th>
<th>2018</th>
<th>2019</th>
<th>2020</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>0</td>
<td>0</td>
<td>2,012,964</td>
</tr>
</tbody>
</table>

Table 28 - Total ESG Funds Expended

### 11f. Match Source

<table>
<thead>
<tr>
<th></th>
<th>2018</th>
<th>2019</th>
<th>2020</th>
</tr>
</thead>
<tbody>
<tr>
<td>Other Non-ESG HUD Funds</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Other Federal Funds</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>State Government</td>
<td>0</td>
<td>0</td>
<td>2,012,964</td>
</tr>
<tr>
<td>Local Government</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Private Funds</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Other</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Fees</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Program Income</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Total Match Amount</td>
<td>0</td>
<td>0</td>
<td>2,012,964</td>
</tr>
</tbody>
</table>

Table 29 - Other Funds Expended on Eligible ESG Activities

### 11g. Total

<table>
<thead>
<tr>
<th>Total Amount of Funds Expended on ESG Activities</th>
<th>2018</th>
<th>2019</th>
<th>2020</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>0</td>
<td>0</td>
<td>4,025,928</td>
</tr>
</tbody>
</table>

Table 30 - Total Amount of Funds Expended on ESG Activities
Dear Friends,  

To the Minnesota Housing Agency. Thank you for the opportunity to comment on the draft State CAPER Consolidated Annual Performance Report. We, 40 rural, suburban and urban Minnesotans, elected and retired policy-makers, district and chartered public school educators, youth, including people who have experienced homelessness, represent a broad array of cultures and communities. We appreciate this is a complex issue, that the pandemic has complicated this situation and that a number of things have been done. We have several questions.

1. What is the state planning to change in the coming year, to deal with the fact that Mn set a goal of constructing 45 rental housing units for, and according to the report, completed zero (0) in the last year? (p. 5) We’ve seen homes and other buildings constructed all over the state in the last year. While there are construction challenges, there also are opportunities. There’s an urgent need for much more permanent affordable housing for those experiencing homelessness of all ages, all circumstances. We discuss some of them below.

The HOME and National Housing Trust programs are important components of many capital resources for housing development that Minnesota Housing makes available each year. The annual goals of 45 rental units rehabilitated and 45 rental units newly constructed are part of a five-year goal of 450 total rental units assisted by these programs. The current year is indicative of a shift of using these resources more for rehabilitated units towards new construction. New construction projects have a longer time frame and thus no new construction units were completed in the fiscal year for which this report shows. Minnesota Housing has three new construction projects funded by these resources that finished construction but did not close out during the fiscal year, these projects, along with any others who are occupied by 9/30/2021 will be reflected in next year’s CAPER:

- Park 7, Minneapolis, 25 NHTF
- Dublin, Mankato, 26 HOME
- White Oak, 8 HOME, 20 NHTF

For all resources that Minnesota Housing makes available (including the Low Income Housing Tax Credit, and other state and federal resources), in 2019, 3,215 units of rental housing were constructed or rehabilitated, 2018 had 2,065 units completed, and 2017 had 2,767 units completed. We encourage stakeholders to reference Minnesota Housing Annual Program Assessment for further details for all programs (mnhousing.gov/sites/np/research).
2. Why does the state rely on the “point of time” survey (p 20) to estimate the number of youth experiencing homelessness, rather than using as a starting point the figure published by the Minnesota Department of Education? CAPER notes “a 11 percent decrease in homelessness among families with children, and a three percent decrease in the number of unaccompanied youth under 25 experiencing homelessness...” between January 2018 and January 2019. MDE figures show that the number of students experiencing homelessness has increased from 7,695 in 2013-14 to 8,696 in 2018-19 and 9,060 in 2019-20. Moreover MDE’s numbers reflect only one day. Districts and charters all over the state report that the actual number of homeless youth they serve over a year is 2-3 times the number that appears on the MDE website. A federal report released in January, 2020 concluded that the number of youth experiencing homelessness in Minnesota during the 2017-18 school year was 16,698, up slightly from the 2015-16 school year.

The State recognizes the many limitations to nearly all data, including the Point in Time count, regarding the prevalence of homelessness and youth homelessness in particular. The State works to use various available data sources in our work.

3. What is the state planning to do to increase the number and percentage of Black, Indigenous, Families of Color served? Your report notes that of 1036 people served by the CDBG program, 1002 were white. Of 9478 people served by the ESG program almost half were white (4815) (page 7). What will Minnesota do to more effectively meet the permanent needs of members of BIPOC communities.

Minnesota Housing requires all properties funded through our programming, including as required for HOME and NHTF, an Affirmative Fair Housing Marketing Plan. The plans are to reach those households least likely to apply in a project’s community, including race, ethnicity, disability and family size. These plans are reviewed with all physical inspections on properties and a noncompliant plan would result in findings for that property and a requirement to develop and implement a compliant plan.

Racial equity is a priority of the Walz/Flanagan administration and a priority of Minnesota Housing. Strategies to advance this work include:

1. Engaging with communities to inform program and policy development;
2. Addressing systemic barriers through developing a policy agenda and supporting state and local strategies to advance housing stability, mitigate displacement;
3. Diversity the partners with whom we work;
4. Analyze outcomes and make adjustments and act when populations are not being served equitably.

We are actively exploring strategies to address the underrepresentation of BIPOC developers in contracting, building racial equity metrics and strategies into our Agency from the division to the individual employee level, and have incorporated racial equity scoring criteria and priorities into several of our Requests for Proposal.
4. When discussing Minnesota’s Homeless Youth Act, why does your report not mention “integrated supportive housing and transitional programs,” which are included in Subdivision 1 and Subdivision 5 of this law? The report explains “Minnesota's Homeless Youth Act (HYA) program funds outreach, shelter housing and services to homeless youth across the state.” (p 23) Does the agency agree that Minnesota Youth deserve more options such as the ones provided by the state wide Youth Services Network (YSN) that has a continuum of care-including housing and support services for youth experiencing homelessness? Prior Crossing and Ain Dah Yung in St Paul are examples of such options.

The phrase “Supportive Housing and Transitional Living Programs” was inadvertently left out of the 2020 CAPER Draft, and the final version will be edited to more accurately reflect the breadth of homeless youth programs that are both allowed and currently funded with Homeless Youth A Act (HYA) funding. Currently, 59 percent of HYA funds go towards supportive housing and transitional living programs including the two programs you described. In addition, 14 of the 15 member agencies within the Youth Services Network receive HYA funding from the Department.

5. When discussing “innovative ways to reduce costs, is the agency prepared to expand support for example, to Minnesota YouthBuild? As a recent report explains, this program simultaneously teaches young people construction and other skills, while they rehab existing apartments and homes, and in some cases, actually building homes for those experiencing homelessness.

Participants in HUD Youthbuild programs are currently among the residents defined in the Section 3 Hiring and contracting requirements for construction programs (including HOME and NHTF). While Minnesota Housing has not funded a Youthbuild program, or the homebuilding program referenced in the comment for Anoka Hennepin school district, these programs may be eligible for applying to the agency’s Community Homeownership Impact fund, which provides funding for developers and administrators of single family, owner occupied affordable housing activity throughout the state. Funding is accessed through a competitive Request for Proposal process. More details can be found at www.mnhousing.gov/sites/np/impactfund

6. Has MHFA examined the possibility of supporting and replicating the homebuilding program that the Anoka Hennepin school district has carried out for more than 20 years? Isn’t this an opportunity to simultaneously help young people develop value career-technical skills that are great demand, while helping construct new homes at affordable prices (Anoka-Hennepin estimates the total cost of a 3 bedroom home to be less than $100,000)

Please the response to Question 5.

7. Is the state planning to add educators and youth who have experienced, or currently are experiencing homeless, to its statewide and metro areas interagency committees? Young people who have experienced homeless, such as the young people whose essay was published by the Star Tribune, have insights and ideas that we believe the state should consider. Is MHFA going to do this in the coming year?
Minnesota Housing, through its capacity building program, just funded Envision Communities for this coming year to provide leadership development for people that have or are experiencing homelessness to build their skills to achieve personal goals and also to inform affordable housing development.

8. What is the state agency planning to do so that the number of contracts awarded to companies headed by BIPOC Minnesotans increases? Your report describes expenditures of more than $24 million. Yet none of the almost $7 million dollars in contracts went to BIPOC led companies and only 6 of 109 subcontracts. (p. 16)

HOME and NTHF funded project are making appropriate efforts to meet these requirements but have fallen short of the goals this year for contracting with People of Color or Indigenous owned entities or Women owned entities. One strategy that Minnesota Housing is taking is in its Qualified Allocation Plan for the Low Income Housing Tax Credit, which added additional opportunities this year for points for projects that meet one or both of the following criteria:

- Two or more key members of the development team are POCIBE/WBE
- The project sponsor, general contractor, architect or management agent partners with a POCIBE/WBE entity with the goal of building the entity’s capacity to develop, manage, construct, design or own affordable housing in the future.

In addition, Minnesota Housing is committed to providing additional oversight and coaching to HOME and NHTF programs to meet the contracting goals for POCIBE/WBE.

9. Has the Housing Agency explored the concept of land trusts? These help insure that projects constructed to provide permanent affordable housing do actually stay affordable.

Minnesota Housing has been supporting community land trusts (CLTs) since the first CLTs formed in Minnesota in the 1990s. Through the Impact Fund, the Agency’s largest single family development program, CLTs typically receive between 30% and 35% of the competitive awards each year to add additional CLT units around the state. In addition, approximately 60 CLT households use Minnesota Housing’s first-time homebuyer financing each year, which represents up to 50% of the overall CLT mortgage financing market in Minnesota. Finally, Minnesota Housing meets at least annually with the Minnesota Community Land Trust Coalition regarding legislative and programmatic issues of mutual interest to further permanently-affordable home ownership opportunities throughout the state.

10. When will the agency prepare next year’s plan? Please contact us. Some of us would like to be involved in the initial discussions to insure these concerns are addressed. If a draft is completed, would you please share it with us so that we can respond before it is finalized?

Next year’s plan will be developed in early 2021 and the State invites participation in this through two public hearings and a comment period that have yet to be scheduled. Notification
of these hearings will be made through the State Register and through agency’s social media and via eNews. Please sign up to receive eNews through Minnesota Housing at http://www.mnhousing.gov/sites/np/enews.

Thank you for considering these questions. We look forward to hearing from you.

Signed,

Dr. Tom P Abeles, executive director, Navigating Futures
Charlotte "Charlie" Castro, Professor with MinnState
Faith Dietz, HR Professional and Community Advocate
Hanna Getachew-Kreuesser, MA, Executive Director, Face to Face Health and Counseling, member of the Youth Services Network (YSN)
Lee George, Neighborhoods for Homes, Powderhorn Park
Aaliyah Hodge, formerly homeless youth, B.A. University of Minnesota, M.A. Humphrey School of Public Affairs, Minneapolis
Wayne Jennings, PhD, former public school teacher, administrator, school board member, and author, Roseville
Dr. Bernadeia H. Johnson, Assistant professor MNSU, Mankato
Former Superintendent, of Minneapolis Public Schools
Jim Kielmeir, PhD, founder, former director, National Youth Leadership Council, Roseville
Tammie Knick, MSW, LICSW, School Social Worker, DREAM Technical Academy/Technical Academies of Minnesota, Willmar, MN
Jane Leonard, President, Growth & Justice
Thomas E. Kottke, MD, MSPH, St. Paul
Alexis Kramer, Freedom from the Streets, Woodbury
Brook LaFloe, ME, Ninijaanis One of Ones
Lily Lamb, co-founder of Neighbors For Homes
David Law, JD, Superintendent, Anoka-Hennepin School District
Shawn Lewis, Former Board Member, Goodwill Easter Seals of Minnesota & Former Trustee, Minnesota 4-H Foundation
Sarah Linnes-Robinson, Executive Director, Kingfield Neighborhood Association, Minneapolis
Jonette M. Lucia, MMA 20 years, Northwest Hennepin Family Service Collaborative, Retired
Roy Magnuson
Shane Morine, Neighbors For Homes
Amy Meuers, Chief Executive Officer National Youth Leadership Council
Joe Nathan, PhD, director, Center for School Change
Vicki Nelson, retired educator, rural Grand Rapids, Minnesota
Carin Peterson, President ~ Sheridan Neighborhood Org, Mpls
John Poupart, founder, Executive Director, American Indian Policy Center, West St. Paul
Jane Prince, St Paul City Council Member, Ward 7
Khalique Rogers, University of Minnesota student who formerly experienced homeless, entrepreneur
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Jim Vue, Saint Paul Public School Board Member
Mary Ann Barrows Wark
Nelsie Yang, Councilmember, Saint Paul Ward 6
November 30, 2020

MICAH’s Comments on the
Consolidated Annual Performance and Evaluation Report for FY2020

Thank you for the opportunity to comment.

1. CR-25. MICAH continues to be concerned that the State only uses HUD’s Point in Time Count to report information in this section which is both an archaic manner to count and (as mentioned in following comments) does not include many youth and others experiencing homelessness in make shift situations not included in HUD’s definition of homelessness.

   The State recognizes the many limitations to nearly all data, including the Point in Time count, regarding the prevalence of homelessness and youth homelessness in particular. The State works to use various available data sources in our work.

2. The Heading Home Together Plan while it did include input from people experiencing homelessness; it does not include at the decision making tables people who have recently or are experiencing homelessness or housing crises in determining principles and strategies to end homelessness.

   As you mentioned, the Interagency Council on Homelessness did include input from people with lived experience into the plan development. The Council seeks input in a variety of forums and will continue to explore ways to enhance our engagement with people who recently or are currently experiencing homelessness.

3. C-15 Narrative $1Billion of the FFY2020 funds identified were Mortgage Revenue Bonds for First Time Home Buyers which primarily supported Caucasian homeownership.

   Minnesota has the fourth largest disparity in homeownership rates in the country for households of color and indigenous communities and we have a strategic priority to address homeownership barriers and reduce disparities. In federal fiscal year 2020, 34% of Minnesota Housing’s mortgages for first-time homebuyers went to BIPOC households, while in 2018, only 16% of all home-purchase mortgages in the overall mortgage market in Minnesota went to BIPOC households. While Minnesota Housing lending far outpaces lending to BIPOC households than the overall market, we recognize the need to increase our lending to BIPOC households and support the overall mortgage industry in increasing lending to BIPOC households. Our goal is to reach 40% of our first-time homebuyer loans going to BIPOC households by 2023.
4. **CDBG**: 67 of the 1036 people served were Black, Indigenous, People of Color and Hispanic. Wilder Homeless data is clear that Black, Indigenous, People of Color and Hispanic people experienced homelessness, at a higher rate than Caucasian. Our communities must have as a priority in use of CDBG funds, to address this disparity, by expanding housing options that are affordable to Black, Indigenous, People of Color and Hispanic people in our communities.

   In this pandemic time, DEED continues promoting Fair Housing and Section 3 through webinars to grantees. Since DEED’s CDBG funds are for non-entitlement communities in the Greater Minnesota area only, the number of households of color assisted does not necessarily meet HUD data for the entire state of Minnesota. Unlike the Metropolitan areas, populations of people of color are not represented in every Greater Minnesota Community. DEED continues to encourage, where applicable, communities to apply for funds that will assist households of color. The discrepancy between the housing and the beneficiaries’ data is due to the IDIS’s national objective matrix of low and moderate income. Housing projects are eligible through housing activities (LMH) where race demographics can be determined while public facility projects are eligible by area benefit activity (LMA) where eligibility is based on the community meeting 51% low and moderate beneficiaries. Therefore, DEED is meeting the national objective. Our reporting data are obtained from the IDIS reporting system.

DEED continues to make positive movements in recognizing and helping to address disparities but limited use by our diverse population continues due to the demographics in the Greater Minnesota area. In DEED’s training workshops, the importance of citizen participation is emphasized to local units of government in non-entitlement areas. DEED also consults with HUD to provide future training opportunities and awareness for grantees to further outreach and promote fair housing. CDBG funds addressing housing and public facility improvements are available to applicants who meet the national objective of low and moderate income and are limited to the local unit of government’s application for funding and their outreach within their communities.

CDBG funds administered by DEED are run through the State’s Small Cities Program and are subject to those state rules in addition to the CDBG requirements. Thus, CDBG funds administered at DEED are focused on developing viable communities by providing financial assistance to eligible non-entitlement local unit of governments by addressing the need for decent, safe, affordable housing as well as supporting local economic development and public facility needs. Based on the need in the non-entitlement areas and in compliance with the Small Cities Grant Program, CDBG funds are focused on rehabbing and preserving housing stock, addressing slum and blight situation, economic development and by partnering with state agencies for public facility infrastructure. Based on DEED’s stellar track record, ever growing number of grant applications, successful completion of rehabbed units and feedback from the communities that have
benefited from CDBG funding, DEED is well positioned to manage the CDBG program. DEED has staff who possess the expertise in MN administration rules and federal regulation for community development block grants, in particular housing rehabilitation projects.

5. We want to thank you for the significant information in this report on your attempts to address the Analysis of Impediments to Fair Housing Choice.
   a. We support you helping to keep HousingLink’s Low Income Tax Credit development database current to report distributions to better track housing choice and opportunities throughout the State.
   b. CDBG recipients should have operationalized not process goals regarding their one Fair Housing Activity to track how their training/education, of grantees, on fair housing laws and resources assisted in preventing/decreasing evictions, discrimination complaints, and addressing rental housing issues.

   Thank you for the comments on the Analysis of Impediments to Fair Housing Choice actions made this year. We recognize the need to have up to date information such as the tax credit database to evaluate impacts.

6. In addition: MICAH supports and assisted with these comments

   See state response to Joe Nathan, et. Al. letter in previous comment response.

Thank you for the opportunity to comment on the draft State CAPER Consolidated Annual Performance Report. We, 40 rural, suburban and urban Minnesotans, elected and retired policy-makers, district and chartered public school educators, youth, including people who have experienced homelessness, represent a broad array of cultures and communities. We appreciate this is a complex issue, that the pandemic has complicated this situation and that a number of things have been done. We have several questions.

1. What is the state planning to change in the coming year, to deal with the fact that Mn set a goal of constructing 45 rental housing units for, and according to the report, completed zero (0) In the last year? (p. 5) We've seen homes and other buildings constructed all over the state in the last year. While there are construction challenges, there also are opportunities. There’s an urgent need for much more permanent affordable housing for those experiencing homeless of all ages, all circumstances. We discuss some of them below.

2. Why does the state rely on the “point of time” survey (p 20) to estimate the number of youth experiencing homeless, rather than using as a starting point the figure published by the Minnesota Department of Education? CAPER notes "a 11 percent decrease in homelessness among families with children, and a three percent decrease in the number of unaccompanied youth under 25 experiencing homelessness...” between January 2018 and January 2019. MDE figures show that
the number of students experiencing homelessness has increased from 7,695 in 2013-14 to 8,696 in 2018-19 and 9,060 in 2019-20. Moreover MDE’s numbers reflect only one day. Districts and charters all over the state report that the actual number of homeless youth they serve over a year is 2-3 times the number that appears on the MDE website. A federal report released in January, 2020 concluded that the number of youth experiencing homelessness in Minnesota during the 2017-18 school year was 16,698, up slightly from the 2015-16 school year.

3. What is the state planning to do to increase the number and percentage of Black, Indigenous, Families of Color served? Your report notes that of 1036 people served by the CDBG program, 1002 were white. Of 9478 people served by the ESG program almost half were white (4815) (page 7). What will Minnesota do to more effectively meet the permanent needs of members of BIPOC communities.

4. When discussing Minnesota’s Homeless Youth Act, why does your report not mention “integrated supportive housing and transitional programs,” which are included in Subdivision 1 and Subdivision 5 of this law? The report explains “Minnesota's Homeless Youth Act (HYA) program funds outreach, shelter housing and services to homeless youth across the state.” (p 23) Does the agency agree that Minnesota Youth deserve more options such as the ones provided by the state wide Youth Services Network (YSN) that has a continuum of care-including housing and support services for youth experiencing homelessness? Prior Crossing and Ain Dah Yung in St Paul are examples of such options.

5. When discussing “innovative ways to reduce costs, is the agency prepared to expand support for example, to Minnesota YouthBuild? As a recent report explains, this program simultaneously teaches young people construction and other skills, while they rehab existing apartments and homes, and in some cases, actually building homes for those experiencing homelessness.

6. Has MHFA examined the possibility of supporting and replicating the homebuilding program that the Anoka Hennepin school district has carried out for more than 20 years? Isn’t this an opportunity to simultaneously help young people develop value career-technical skills that are great demand, while helping construct new homes at affordable prices (Anoka-Hennepin estimates the total cost of a 3 bedroom home to be less than $100,000)

7. Is the state planning to add educators and youth who have experienced, or currently are experiencing homeless, to its statewide and metro areas interagency committees? Young people who have experienced homeless, such as the young people whose essay was published by the Star Tribune, have insights and ideas that we believe the state should consider. Is MHFA going to do this in the coming year?

8. What is the state agency planning to do so that the number of contracts awarded to companies headed by BIPOC Minnesotans increases? Your report describes
expenditures of more than $24 million. Yet none of the almost $7 million dollars in contracts went to BIPOC led companies and only 6 of 109 subcontracts. (p. 16)

9. Has the Housing Agency explored the concept of land trusts? These help insure that projects constructed to provide permanent affordable housing do actually stay affordable.

10. When will the agency prepare next year’s plan? Please contact us. Some of us would like to be involved in the initial discussions to insure these concerns are addressed. If a draft is completed, would you please share it with us so that we can respond before it is finalized?

Dr. Tom P Abeles, executive director, Navigating Futures
Charlotte "Charlie" Castro, Professor with MinnState

Faith Dietz, HR Professional and Community Advocate
Hanna Getachew-Kreuusser, MA, Executive Director, Face to Face Health and Counseling, member of the Youth Services Network (YSN)
Lee George, Neighborhoods for Homes, Powderhorn Park
Aaliyah Hodge, formerly homeless youth, B.A. University of Minnesota, M.A. Humphrey School of Public Affairs, Minneapolis
Wayne Jennings, PhD, former public school teacher, administrator, school board member, and author, Roseville
Dr. Bernadeia H. Johnson, Assistant professor MNSU, Mankato
Former Superintendent, of Minneapolis Public Schools
Jim Kielsmeir, PhD, founder, former director, National Youth Leadership Council, Roseville
Tammie Knick, MSW, LICSW, School Social Worker, DREAM Technical Academy/Technical Academies of Minnesota, Willmar, MN
Jane Leonard, President, Growth & Justice
Thomas E. Kottke, MD, MSPH, St. Paul
Alexis Kramer, Freedom from the Streets, Woodbury
Brook LaFloe, MEd, Ninijaanis One of Ones
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Jim Vue, Saint Paul Public School Board Member
Mary Ann Barrows Wark
Nelsie Yang, Councilmember, Saint Paul Ward 6

Thank you for the opportunity to comment.

Be safe and well.
God's peace,
Sue Watlov Phillips M.A.
Executive Director, MICAH
President, National Coalition For The Homeless
Housing Justice Center Comments

November 30, 2020
VIA EMAIL

RE: Draft 20202 CAPER

To Whom It May Concern:

The Housing Justice Center (HJC) is a Twin Cities-based public interest legal and policy advocacy organization focused on preserving and expanding the supply of affordable housing. We write to offer comments on the State of Minnesota’s Draft Consolidated Annual Performance Evaluation Report for 2020.

We understand that due to COVID-19 this was a challenging year for program administration across state government. This was also a year when the urgency for resources to support the housing needs of low-income Minnesota families was particularly acute. While we are aware that efforts to get resources out the door under exceptional circumstances mean that the information about who and how people were served by the resources is not reflected in the current draft of the CAPER, this also means that it is impossible to determine the impact of the resources here in Minnesota.

The draft report does not comply with 24 C.F.R. 91.520(a), which requires that the annual Performance Report must include, among other things, a description of the resources made available and the investment of available resources. The draft report, and related material on the MHFA website, contain three dramatically conflicting reports on availability and use of resources. First, the table on page 8 of the draft CAPER shows $26,058,000 in CDBG funds available in 2020 and only $5,787,955 used during the period. Second, the table on page 5 shows instead $16,757,320 CDBG funds available, more than $9 million less than the page 8 table, but still about $11 million unused. Third, the file labeled PR 26 on the MHFA website shows $35,501,657 of CDBG funds available, including $16.2 M of 2019 CDBG funds. The funds available for 2020 on this table, including program income, total $19,310,612 disagreeing substantially with the first two figures for CDBG funds available. Further, with the carry-over funds included the amount unspent is almost $30 million. Finally, PR 28, also on the website, shows, at 1-7, $16,329,277 of obligated funds. The amount available on that table matches that on PR 26, but the amount committed still leaves over $19 million of available funds (including the carry-over) unused.

While we understand that there are reasons for the data discrepancies, the material in the draft CAPER, with the other two sets of data on the MHFA website, collectively fail to meet the regulatory requirement. It is impossible to evaluate the efficiency of the state agencies and the programs which employ CDBG funds from this report. It cannot be submitted to HUD as is and a corrected draft report must be submitted for public comment before submission to HUD.

DEED Response

The draft CAPER Report complies with 24 C.F.R. 91.520(a). Unfortunately, due to COVID – 19, the CDBG reporting numbers are not accurately reflected in the Integrated Disbursement and Information System (IDIS) reports that are included in the CAPER. The spread of COVID-19 had
increased the strain on DEED’s fiscal department resulting in a backlog of payment entries into the IDIS. Payments have been disbursed successfully to grantees, however entries in IDIS occurred after the reporting period. Hence, the data retrieved from the IDIS dashboard which are the reports attached to the CAPER do not capture the actual expenditures and appear skewed. HUD is aware of this as DEED has been in communication in regard to this matter. Funds shown as unused are earmarked and have already been committed as CDBG grants. The current balance of available funds that have not been already committed to projects, is $0.

Who has benefitted from use of CDBG funds?

There are two tables that address this issue. The first, at page 7 of the draft CAPER, shows 1036 "families" assisted with CDBG funds. Of these only 34 (3.3%) are households of color. If the 33 Hispanic households shown separately on the table do not overlap with the other households of color, then the total assisted households of color is 67, or 6.5% of those assisted. The most recent HUD CHAS data for Minnesota (https://www.huduser.gov/portal/datasets/cp.html; "data download page"; Table 1) shows 1,737,310 Minnesota households with incomes at or below 80% of AMI, with 1,376,190 being white, non-Hispanic households. Therefore 361,120 or 20% of the households in the state with low or moderate incomes are households of color; yet only 6.5% of the families assisted by CDBG are households of color. Households of color are thus dramatically underserved by the state’s use of CDBG funds. The state’s statutorily required certification that it is affirmatively furthering fair housing is open to serious challenge given this statistic.

The second table is at page 19. It sets out the number of households assisted with CDBG funds who are low or moderate income. There are only 322 such households, in contrast to the table on page 7 showing 1036 "families" assisted with CDBG funds. The two tables read together imply that only 31% of the CDBG-assisted households were low/moderate income. The primary Congressional objective of the CDBG program is provision of "decent housing in a suitable living environment and expanding economic opportunities, principally for persons of low and moderate income." 42 U.S.C. 5301(c). Entitlement grantees must certify that "their projected use of funds has been developed so as to give maximum feasible priority to activities which will carry out one of the national objectives of benefit to low- and moderate-income families or aid in the prevention or elimination of slums or blight." 24 C.F.R. 570.200(a) (2). It's difficult to see how the state can make this certification.

Once again, our conclusion is that DEED is simply not well positioned to effectively utilize CDBG funds directed toward housing in a manner that affirmatively furthers fair housing. In the interest of aligning and targeting programs in a more effect manner, we believe that MHFA would be better suited to administer the housing portion of CDBG funds. As it currently stands, the state’s certification that it is affirmatively furthering fair housing is highly questionable.

DEED’s Response:

In this pandemic time, DEED continues promoting Fair Housing and Section 3 through webinars to grantees. Since DEED’s CDBG funds are for non-entitlement communities in the Greater Minnesota area only, the number of households of color assisted does not necessarily meet HUD data for the entire state of Minnesota. Unlike the Metropolitan areas, populations of people of
The discrepancy between the housing and the beneficiaries’ data is due to the IDIS’s national objective matrix of low and moderate income. Housing projects are eligible through housing activities (LMH) where race demographics can be determined while public facility projects are eligible by area benefit activity (LMA) where eligibility is based on the community meeting 51% low and moderate beneficiaries. Therefore, DEED is meeting the national objective. Our reporting data are obtained from the IDIS reporting system.

DEED continues to make positive movements in recognizing and helping to address disparities but limited use by our diverse population continues due to the demographics in the Greater Minnesota area. In DEED’s training workshops, the importance of citizen participation is emphasized to local units of government in non-entitlement areas. DEED also consults with HUD to provide future training opportunities and awareness for grantees to further outreach and promote fair housing. CDBG funds addressing housing and public facility improvements are available to applicants who meet the national objective of low and moderate income and are limited to the local unit of government’s application for funding and their outreach within their communities.

CDBG funds administered by DEED are run through the State’s Small Cities Program and are subject to those state rules in addition to the CDBG requirements. Thus, CDBG funds administered at DEED are focused on developing viable communities by providing financial assistance to eligible non-entitlement local unit of governments by addressing the need for decent, safe, affordable housing as well as supporting local economic development and public facility needs. Based on the need in the non-entitlement areas and in compliance with the Small Cities Grant Program, CDBG funds are focused on rehabbing and preserving housing stock, addressing slum and blight situation, economic development and by partnering with state agencies for public facility infrastructure. Based on DEED’s stellar track record, ever growing number of grant applications, successful completion of rehabbed units and feedback from the communities that have benefited from CDBG funding, DEED is well positioned to manage the CDBG program. DEED has staff who possess the expertise in MN administration rules and federal regulation for community development block grants, in particular housing rehabilitation projects.
Email submitted by L. L. Soderstrom:

To Kirby Pitman

From L.L.Soderstrom
Re CAPER
Date 11/30/2020

I am responding to a very late notice of this opportunity to give feedback. Thank you very much for this opportunity to give feedback.

PLEASE STOP GIVING TIFS OUT LIKE CANDY

I lived at Crossroads at Penn in 2015 and have been Community organizing ever since. I have seen literally no change in that time. All the new good ideas coming forward from the state and the FED have involve 60 to 120% Ami buildings with TIF which will hold for 40 years and the 40-year TIF is treated as a miracle.

Nothing has been done for the 30% and below Ami Market. It is my Express opinion that the 50 to 120% Ami Market will take care of itself. The people most in need are the people at 50 and 40 and 30% Ami and below and no one is serving that need.

USE A MEDICAL MODEL VERSUS MONEY TO RULE

You all need to take a triage type approach to those in deepest need and serve them first. Meanwhile when you do not take the most in need first and preserve their housing or create new housing for them you are literally costing lives. You're costing people their jobs. You're costing people their health. You're costing people their education. And that includes quite young children who especially in the grades of kindergarten through 6th when moved around upon numerous occasions probably do lose one year of educational progress for every move. So an example would be that a second grader Who Wants To Be A Nurse when they grow up gets jumped around once. And decides by 4th grade well I'll probably be a nurse's aide. Their parents are run down. The money is used up. No one gives any nurture or attention to their career desire. And by 4th grade they themselves are tired from moving and making new friends and trying to find a teacher who can support and sponsor and nurture them.

Same said child then is forced out again by a developer who is flipping the next property and this might sound like progress to most people. The city gets a new property. Or an older property gets an uplift or a facelift or is repositioned in the market. That sounds all about the city doesn't it?

Well by the time that same child reaches 6th, if they've had to move twice between K-6 there is a probability that they may have depression or anxiety. There is a possibility that they may have forgotten completely what their dreams were. Their parents maybe so shifted off balance and off-kilter that they have now no savings whatsoever and don't even get along anymore. And instead of having a dream this
child could grow up to be someone with mental or emotional or chemical problems for which they themselves need a nurse in their lives as a case manager.

SELF DETERMINATION WILL FOSTER BETTER OUTCOMES

I've been watching many of the programs including Governor Dayton's task force in full which I did attend tho was not appointed to be on the board. In fact no actual resident representatives were on any of the Committees of Governor Dayton's Housing Task Force.

That was really a shame because actual resident renters or tenants; true representatives do know how it feels and they/we have wisdom as to practicalities of living in the actual properties that you all design the programs for. You develop conduits which fund the buildings we live in. Unless you yourself have been homeless at some point in your life you really cannot understand the type of Jeopardy that we are under at all times.

Governor Dayton's task force identified the importance of housing for every Minnesotan. And at that time they estimated that (between 2020 and 2030) 300,000 new affordable units would be needed in Minnesota and that is not counting the Noah properties that are being lost due to gentrification.

BLOOMINGTON OPPORTUNITY HOUSING ORDINANCE

Please do at your earliest opportunity check into the guidelines created by Doctor Eric Johnson Ph.D in Bloomington Minnesota. The work he authored is the Bloomington opportunity housing ordinance. And I was a part of that committee for a number of years. It involves a gap funding procedure through which the most deeply poor people recieve the deeply affordable housing opportunities they need. How he goes about this is setting up a trust fund and land trusts which are contributed to by the primary industries of the given City. There will be families with history who want to give gifts or there will be corporations who wish to donate so their workforces can be housed nearby. There are also other sources and resources which have never been tried before but go into one trust account and qualify as Gap Funding for families in the lower incomes to live with families in the upper-lower incomes.

MIXED USES AND MIXED INCOME BASED HOMES FOR ALL

Another example of a new good idea is that I myself believe that 30% of every building in our nation should be occupied by families and individuals paying only 30% of their income absolutely. I believe this would be a solution to how we are needing more housing and I expect that no one in any of the housing would even mind one bit. If people were restructured financially annually according to their income and their rentals were income-based I do think we are far enough along as a culture that people of all incomes could live together in this day and age. It's just not being tried because you are not having new good ideas which are new enough or good enough to get it done. That is why I am offering to help you to change your mindset. We people in the recipiency status can see Solutions. You are just not using us and I wish you would.

VALUES CONSTRUCTS NEED A DO OVER
It is very very sad to me that this gentrification seems to be placing profit over people. We literally are spending money on shelter because we don't prevent homelessness. We are pouring money into emergency and transitional housing when people have been chronically and persistently homeless. And there are so many other populations each with their special needs who have been essentially created by your department.

Please build homes for every Minnesotan. We don't need fancy. We just want a tiny home of some sort where we can come in and lock the door and be alone or alone with our family and cook a meal and take a bath and put our head down on a pillow and pick it up in the morning and think what to do. Homelessness is not a way to live. Homelessness should be brief, rare and non-recurring. And you all know all the logos and the mottos and the scenarios. What you are not doing is supplying the homes.

Please advise who I may speak with in future about your future Caper reports and how to be involved in designing housing for Minnesotans. If you have no actual people themselves impacted in your committees and on your commissions and Boards of directors then you won't know what we think. You will have to look back after making design errors and content blunders and ask us how we would have done it.

If you have us in the room while you are thinking up these programs that will save you many steps in seeking correction.

We are here for you - you are just not using us. We do not want to be invited to town hall meetings. Nor do we want to serve on a panel one-time-only. Nor are we a special person to come for a special day. We want to be actually voting members of decision-making bodies in the housing departments, as citizen representatives for the state of Minnesota.

And yes to involve the lay person who lives in the actual housing you design and fund you will have to provide for some of our needs in participating. We will need small stipends. We will need Transportation support or someone to give us a ride. We will need funding for or the provision of childcare. Language interpretation is something you very well know is needed statewide as Minnesota has more immigrant communities combined than any other state in the Union to my knowledge.

I will stop with this for today because my time is very short. I would like to know who I may speak with in future in regards to more ideas I would have sent today if I had known about this opportunity sooner. I regret that I wasn't able to build a longer report of recommendations for you but I can in the very near future if someone has time to confer with me. Thank you very much for listening to these concerns and I do look forward to hearing from someone who can take additional thoughts and ideas from the public. These are my public comments in my own words for today.

Cordially

Linda Soderstrom
Apt #9
State of Minnesota Response to FFYCAPER Public Comments from Linda Soderstrom

Ms. Soderstrom,

We appreciate the thorough comments.

It’s important to note that the agencies who administer these programs are not responsible for TIF nor do they have any oversight or activities on the municipal level, such as the Bloomington Opportunity Housing Ordinance cited in the comment.

The purpose of the Consolidated Annual Performance and Evaluation Report (CAPER) is to provide federally required annual reporting of activities by our state agencies for the Community Development Block Grant, HOME Investment Partnerships, National Housing Trust Fund, Emergency Solutions Grants, and the Housing Opportunities for Persons with AIDS Programs funded through HUD.

Every five years the State of Minnesota submits a Consolidated Housing and Community Development Plan to the U.S. Department of Housing and Urban Development outlining the state's goals and strategy for using federal funds to meet identified housing and community development needs. The action plan and the state’s performance toward meeting goals are updated annually, as is reflected in the CAPER. The five year plan for 2017-2021 and all annual action plans and CAPER can be found at http://www.mnhousing.gov/sites/np/plans.

Through the current five year plan, the state has prioritized populations with the greatest needs for assistance in these programs, which includes renters with incomes at or below 30% of area median income, homeowners with incomes between 51 and 80% of area median income, and non-homeless people with special needs. As described in the CAPER, the HOME and National Housing Trust Programs – which are the rental development programs reflected in the report – two thirds of renter households occupying units completed in 2020 had incomes below 30% of area median income. Additionally, the requirements of the National Housing Trust Fund program are to serve this population for 100% of units. Opportunities for input into the planning process for the final action plan of the current five-year plan include forthcoming public hearings and comment periods. This planning process focuses on the
resources from HUD that are named above and the process will begin in early winter 2020 and public notification will be provided through eNews, social media and the State Register. Please do sign up for Minnesota Housing’s eNews at http://www.mnhousing.gov/sites/np/enews to make sure you receive timely notification.

We recognize the need for effective community engagement more broadly as well. Minnesota Housing, through its Affordable Housing Plan, noted that this involves creating more opportunities for participation in program decision-making, listening, and taking action on what is learned. Minnesota Housing committed to create and implement a new community development and engagement strategy in 2020-2021 and to create the capacity, structure, partnerships and expertise to carry out this work effectively. In the first quarter of 2021, Minnesota Housing and Greater Minnesota Housing Fund are planning virtual engagement sessions targeted to different regions in Greater Minnesota. We know that virtual meeting platforms can be a challenge to access depending on internet connectivity and access to technology and will provide a variety of options for access. In addition to these upcoming opportunities, Minnesota Housing’s engagement work group will be developing a range of strategies to build relationships with a variety of stakeholders ranging from formal engagement events to listening sessions to one on one discussions. Through this engagement work group, we will also improve our coordination across the Agency to capture and act upon the information we receive.