



Saint Louis County

ACTION PLAN FY 2024

**St. Louis County
Urban County Entitlement**

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

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

Executive Summary

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

1. Introduction

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

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

The FY 2024 Action Plan is a statement of how the County intends to spend its HUD entitlement funds in the areas of housing and community development over the 2024 program year. The annual program year for Consolidated Plan purposes runs from May 1 – April 30.

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

2. Summarize the objectives and outcomes identified in the Plan

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

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

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

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

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

3. Evaluation of past performance

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

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

- Assisted 295 families to become first time home buyers by providing counseling, education, access to low-interest mortgage products and down payment assistance
- Maintained existing housing stock by providing loans and grants to 152 low-moderate income families
- Assisted with the rehabilitation of 77 affordable rental units
- Expanded economic opportunities through technical assistance and training to 206 LMI microenterprise business owners and 669 low-income individuals
- Improved communities by removing 2 blighted property, improving 53 public infrastructure projects, improved 5 public facility and removing physical barriers to 15 public facilities
- Provided services to 187,320 low- and moderate-income persons which improve their quality of life, promote self-sufficiency, and reduce homelessness

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

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

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

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

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

5. Summary of public comments

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

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

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

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

7. Summary

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

continue to obtain public input annually to assure projects and activities receiving entitlement funding address community needs.

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

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

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

Agency Role		Name	Department/Agency
CDBG Administrator	ST. LOUIS COUNTY	Economic and Community Development Department	
HOME Administrator	ST. LOUIS COUNTY	Economic and Community Development Department	
ESG Administrator	ST. LOUIS COUNTY	Economic and Community Development Department	

Table 1 – Responsible Agencies

Narrative

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

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

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

Consolidated Plan Public Contact Information

Darren Jablonsky, Interim Director, St. Louis County - Economic and Community Development Department, Government Services Center, 320 W 2nd St, Ste. 301, Duluth, MN 55802, jablonskyd@stlouiscountymn.gov 218-725-5011

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

1. Introduction

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

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(l)).

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

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

Economic and Community Development staff are also participating in Minnesota Housing Partnership Housing Institute 9 with 5 local communities to build capacity and move housing projects forward.

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

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

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

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

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

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

Table 2 – Agencies, groups, organizations who participated

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

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

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

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

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

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	One Roof Community Housing develops owner-occupied and multifamily housing in the counties of St. Louis, Cook, and Lake. Their staff provide input to the demand for housing and the financial climate for development. One Roof is a land trust and an approved CHDO for the HOME Consortium.
11	Agency/Group/Organization	Northeast Service Cooperative (NESC)
	Agency/Group/Organization Type	Services-Education Internet service provider consultation
	What section of the Plan was addressed by Consultation?	Broadband
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Northeast Service Cooperative (NESC) created the Northeast Fiber Network spanning eight counties in northeast Minnesota designed to provide broadband to underserved and unserved areas. The project received \$45.3 million dollars in federal funding and extends 865 miles across the region. The NESC provides information about Internet service provider expansion and coverage in the region. Consultation with NESC and review of its fiber mapping project provided input to the Consolidated Plan.
12	Agency/Group/Organization	Range Association of Municipalities and Schools (RAMS)
	Agency/Group/Organization Type	Regional organization
	What section of the Plan was addressed by Consultation?	Broadband

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Range Association of Municipalities and Schools (RAMS) is a non-profit organization formed to represent communities and schools across the Iron Range. RAMS recently created a crowdsourcing project covering multiple counties to gather broadband speed data. This data is critical to broadband expansion in rural areas and especially for identification of unserved or underserved areas. St. Louis County is supporting and participating in this project.
14	Agency/Group/Organization	SLC Planning - Land Use Division
	Agency/Group/Organization Type	Other government - County Grantee Department
	What section of the Plan was addressed by Consultation?	Public land management, water resources, flood prone areas
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The St. Louis County Planning Department is made up of multiples divisions including Land Use and Community Development. The Land Use Division as its name implies issues permits for buildings and use of real property. Community Development and Land Use staff persons share office space and expertise through periodic staff meetings.
15	Agency/Group/Organization	SLC Sheriff Department
	Agency/Group/Organization Type	Agency - Emergency Management Grantee Department
	What section of the Plan was addressed by Consultation?	Emergency Management

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The St. Louis County Sheriff Department also includes the St. Louis County Rescue Squad. The Sheriff Department has responsibility for emergency management throughout St. Louis County and maintains mobile command station trailers in north and south St. Louis County. The Rescue Squad includes vehicles, equipment, and highly trained volunteers for use in search and rescue on land and water.
16	Agency/Group/Organization	Minnesota Housing Partnership (MHP)
	Agency/Group/Organization Type	Housing Regional organization Planning organization Neighborhood Organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	SLC staff are participating in MHP Housing Institute 9 with five local communities to build housing knowledge and capacity and to develop a housing project. This is an 18 month program.

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

No agency types were excluded from the consultation process.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	St. Louis County Public Health and Human Services	Priorities of the Continuum of Care are shared with the advisory committees for the CDBG and HOME programs. The ESG funding recommendations are reviewed through the CoC process.
Continuum of Care-2	Northeast Minnesota CoC Plan	Priorities of the Continuum of Care are shared with the advisory committee for the HOME program. The NE Minnesota Continuum includes the four additional counties in the HOME Consortium - Cook, Itasca, Koochiching, and Lake.

Table 3 – Other local / regional / federal planning efforts

Narrative

No further discussion.

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

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

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

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

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

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

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Hearing	Non-targeted/broad community	8/19/2023 legal notice of public meeting to announce the 2024 funding cycle for the CDBG, HOME, and ESG Programs.	No comments received - legal notice	Not applicable	

2	Public Hearing	Non-targeted/broad community	<p>The County's annual CDBG application process began with a public hearing conducted both in person. The meeting included discussion of previous year accomplishments, current year application information, and dialog with attendees about housing, economic development, infrastructure, and public service needs in their communities. The meeting was conducted on 9/12/2023 and 9/14/2023.</p>	<p>Needs voiced from meeting participants include: affordable rental and owner-occupied housing (few units are available and those on the market are in poor condition and often over-priced), aging utilities need replacement (water, sewer, storm water and streets as well as treatment facilities), community center rehab and new construction, Internet access and improved speed for rural areas, expanded public services-homeless shelter and</p>	All comments were accepted.	
---	----------------	------------------------------	---	---	-----------------------------	--

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
				food programs.		
3	Newspaper Ad	Non-targeted/broad community	12/16/2023 public notice of the meeting schedule and use of virtual technology to conduct the meetings was published in the Duluth News Tribune. The notice included a link to the St. Louis County website for meeting access.	No comments - public notice	No comments - public notice	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4	Public Meeting	Non-targeted/broad community	1/3, 1/9, 1/11, and 1/18/2024 presentation and selection process for all CDBG applications to be considered for the FY 2024 funding competition. Attendees include CDBG Advisory Committee representatives, applicants, and persons from the general public. Meetings were conducted in person.	Support for or questions of priority of the applications received. These comments are considered by the Advisory Committee in making its funding recommendations to the St. Louis County Board.	All comments were accepted.	
5	Newspaper Ad	Non-targeted/broad community	Notification of the 30-day comment period for the FY 2024 Action Plan. The comment period ran from 3/27 - 4/25/2023.	None	All comments were accepted.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
6	Public Meeting	Non-targeted/broad community affordable housing needs and priorities	2/23/2024 HOME Consortium Advisory Committee. The ten-member committee is made up of a Commissioner from each of the 5 Consortium counties and a housing advocate from each county. The committee reviews applications for HOME funding and creates its recommendation to the St. Louis County Board.	Discussion of housing needs, differences between areas of each county, and priorities for equitable use of HOME funding in the region.	All comments were accepted.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
7	Targeted agency stakeholder meeting	homelessness response	Rural Housing Coalition (RHC) meetings. The RHC is made up of agencies, individuals, and the general public connected to the Continuum of Care for St. Louis County.	2/7/2024: Announce request for ESG applications and receive input to the need and priorities for the use of ESG funding. 3/7/2024: application review and funding recommendation to the St. Louis County Board.	All comments accepted.	
8	Public Hearing	Non-targeted/broad community	7/2/24 St. Louis County Board public hearing on the 2024 Action Plan. County Board meetings are open to the general public.	Discussion by Commissioners of the projects/activities funded and opportunity for the public to comment.	All comments were accepted.	

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

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

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,937,596	37,000	245,749	2,220,345	46,430	SLC allocation was slightly lower than anticipated.
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	476,542	194,959	154,400	825,901	0	SLC allocation was lower than anticipated.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	173,364	0	0	173,364	0	SLC allocation was slightly higher than anticipated..
Other	public - federal	Other	0	0	0	0	0	

Table 2 - Expected Resources – Priority Table

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

CDBG, HOME, and ESG funding has historically leveraged in excess of \$4 for every entitlement dollar. As project costs raise due to inflation, in FY2024, CDBG, HOME, and ESG funding leverages \$14 for every entitlement dollar. Projects listed in the Action Plan include match and leverage sources. ESG is expected to leverage \$334,100 in match, which is 200% of ESG funds. HOME is expected to leverage \$16,876,541 in match, which is 200% of all expected available HOME funding.

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

No publically owned land or property is anticipated to be used for projects in the 2024 Action Plan.

Discussion

No further discussion.

Annual Goals and Objectives

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

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Housing: Home Ownership Education	2020	2024	Affordable Housing	St. Louis County and the NE Minnesota HOME Consortium	Affordable Housing	CDBG: \$0 HOME: \$0	Public service activities for Low/Moderate Income Housing Benefit: 195 Households Assisted
2	Housing: Owner and Renter Housing Development	2020	2024	Affordable Housing	St. Louis County and the NE Minnesota HOME Consortium	Affordable Housing	CDBG: \$60,000 HOME: \$418,832	Rental units constructed: 2 Household Housing Unit Homeowner Housing Added: 7 Household Housing Unit
3	Housing: Home Ownership Assistance Program	2020	2024	Affordable Housing	St. Louis County and the NE Minnesota HOME Consortium	Affordable Housing	HOME: \$0	Direct Financial Assistance to Homebuyers: 0 Households Assisted
4	Housing: Owner-Occupied and Rental Rehabilitation	2020	2024	Affordable Housing	St. Louis County and the NE Minnesota HOME Consortium	Affordable Housing	CDBG: \$375,000 HOME: \$259,415	Rental units rehabilitated: 36 Household Housing Unit Homeowner Housing Rehabilitated: 62 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Public Services	2020	2024	Homeless Non-Homeless Special Needs	St. Louis County and the NE Minnesota HOME Consortium	Public Services	CDBG: \$260,000 ESG: \$160,362	Public service activities other than Low/Moderate Income Housing Benefit: 50380 Persons Assisted Public service activities for Low/Moderate Income Housing Benefit: 841 Households Assisted Tenant-based rental assistance / Rapid Rehousing: 171 Households Assisted Overnight/Emergency Shelter/Transitional Housing Beds added: 70 Beds Homelessness Prevention: 145 Persons Assisted
6	Public Infrastructure: Improvements	2020	2024	Non-Housing Community Development	St. Louis County and the NE Minnesota HOME Consortium	Community Facilities and Public Infrastructure	CDBG: \$822,500	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 21165 Persons Assisted
7	Community Facilities: Accessibility	2020	2024	Non-Housing Community Development	St. Louis County and the NE Minnesota HOME Consortium	Community Facilities and Public Infrastructure	CDBG: \$145,326	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 2 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
8	Community Facilities: Improvements	2020	2024	Non-Housing Community Development	St. Louis County and the NE Minnesota HOME Consortium	Community Facilities and Public Infrastructure	CDBG: \$130,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1 Persons Assisted Other: 1 Other
11	Economic Development: Microenterprise Assistance	2020	2024	Non-Housing Community Development	St. Louis County and the NE Minnesota HOME Consortium	Economic Development	CDBG: \$20,000	Public service activities other than Low/Moderate Income Housing Benefit: 50 Persons Assisted
12	Economic Development: Career Development	2020	2024	Non-Housing Community Development	St. Louis County and the NE Minnesota HOME Consortium	Economic Development	CDBG: \$20,000	Public service activities other than Low/Moderate Income Housing Benefit: 49 Persons Assisted

Table 3 – Goals Summary

Goal Descriptions

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

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

12	Goal Name	Economic Development: Career Development
	Goal Description	

AP-35 Projects - 91.420, 91.220(d)

Introduction

Year 5 of the 2020-2024 St. Louis County Consolidated Plan. CDBG, ESG, and HOME processes included application solicitation, applicant presentations, advisory committee reviews and recommendations, public comment and public hearing opportunities, and approval by the St. Louis County Board of Commissioners.

#	Project Name

Table 4 – Project Information

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

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

AP-38 Project Summary

Project Summary Information

Project Name	Target Area	Goals Supported	Needs Addressed	Funding	Description	Target Date	Esti and tha fro act
<TYPE=[pivot_table] REPORT_GUID=[54A4ED67473EDAEE248792836A1D83B0]>							

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

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

Housing affordability has become more challenging. Housing and rental costs have continued to increase while wages have either stayed the same or increased slightly. Lower priced homes and rental units are typically in need of repair and are undesirable for individuals and families looking for decent housing. The County and Consortium have a limited supply of decent affordable housing. Areas of low-income and minority residents within SLC (outside of the City of Duluth) are concentrated within the larger cities such as Virginia and Hibbing along with the Tribal Territories.

Geographic Distribution

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

Table 5 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

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

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

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

Discussion

No further discussion.

Affordable Housing

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

Introduction

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

One Year Goals for the Number of Households to be Supported	
Homeless	1,227
Non-Homeless	105
Special-Needs	0
Total	1,332

Table 6 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	9
Rehab of Existing Units	96
Acquisition of Existing Units	2
Total	107

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

Discussion

Affordable rental units are harder than ever to find and monthly rental rates have also increased. The home ownership market is also challenging with multiple offers on many affordable home and there is a lack of supply across the County and Consortium. Use of the County Home Ownership Assistance Program experiences a winter slow down, but the increased interest rates lowered clients buying power and costs of home have risen due to inflation and lack of supply has impacted the use of the program.

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

Introduction

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

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

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

The Chisholm HRA, Cook HRA, and Eveleth HRA applied for CDBG funding to rehabilitate their public housing units and were awarded funding during FY2022. The Hibbing HRA applied and was awarded FY2023 CDBG funding for their Moving to Work program. The Cook HRA applied for rehabilitation in FY2024 and were awarded.

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

Promote active engagement and discussion between the PHAs and their respective tenants. An outreach program is being created to promote the NE MN HOME Consortium's Homeownership Assistance Program administered by AEOA and KOOTASCA Community Action to Public Housing Authorities throughout the Consortium area. St. Louis County has also partnered with local PHAs, housing agencies, and other local units of government to put together a Northern St. Louis County Housing Summit. This was held in November 2022. During that meeting PHA's presented to 120 attendees on the need and capacity the PHAs have in their communities. This group meets weekly to discuss housing topics and is striving to create more safe and affordable housing.

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

provided or other assistance

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

Discussion

No further discussion.

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

Introduction

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

The CoC is currently conducting strategic planning to target housing, racial, and equity goals across the CoC jurisdiction that lead to preventing and ending homelessness by increasing resources and addressing root causes to homelessness.

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

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

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

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

individual or family is making toward housing stability.

Addressing the emergency shelter and transitional housing needs of homeless persons

The Coordinated Entry System provides persons experiencing a housing crisis with a housing solution efficiently and effectively. The transitional housing providers, emergency shelters, permanent supportive housing providers, and public housing providers have collaborated to create the system. The agencies also worked to develop goals and standards for each part of the system utilized by clients. For example, in shelter the goal is to reduce bed nights or average stay in shelter before movement to permanent housing. For transitional housing, the goal is to place the client into permanent housing or at least keep the person in transition housing for 6 months rather than returning to the street. Clients in a permanent housing situation such as permanent supportive housing or public housing have a goal to maintain their housing for 6 months. During all housing stages, providers will work with clients to build independent living skills, stabilize income and employment, access health and education services, and other supportive programs to maintain housing stability. The CoC is currently participating in HUD TA to assess new tools for coordinated entry assessment to eventually replace the SPDAT with a tool that is more trauma-informed and equity centered. The goal is to have a new tool by 2025.

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

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

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

The St. Louis County Plan to End Homelessness includes uniform discharge protocols and procedures that prevent people who are being released from county institutions from being discharged into homelessness. The discharge plan outlines transition process steps, based on an evidence-based model called Critical Time Intervention, a standardized assessment tool that is used by all discharging entities

upon client admission to identify those at risk of homelessness, specific services to be offered to all clients and additional services offered to at-risk clients. The Discharge Plan also outlines the roles and responsibilities of the collaborative partner agencies, including coordination, information sharing, staffing patterns for institutional-based and community-based staff, and training.

Discussion

No further discussion.

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

Introduction

The County's efforts have focused on the following identified barriers:

- Lack of capacity to develop housing by nonprofit organizations and local units of government
- High cost of new housing construction vs. expected return on investment
- Enormity of the need for rehabilitation and the tendency to focus on "worst case" versus comprehensive area rehab
- Low market rents historically paid by renters
- Poor soil conditions and bed rock which escalate infrastructure costs
- Relatively low population density
- Lack of innovation in construction methods
- Limited involvement of private developers and the local financial community in regional development
- Lack of senior housing to open up other single family homes
- Lack of affordable housing
- Declining number of contractors to complete repairs, maintenance, and construction
- Limited economic growth that would spur housing development

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

Actions planned for FY 2024 listed below continue to be aimed at reducing the impact of barriers to affordable housing:

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

performance.

- Research alternative programs and incorporate enhancements.
- Expand outreach efforts.
- Increase leverage through access to additional funding sources.
- Foster collaborative efforts within the northeast region to build capacity in housing development through training seminars and forums on rural housing issues.
- Participate in the Housing Summit group to help local units of government and non-profits identify potential projects and resources to guide them.

Affordable housing projects funded in the FY 2024 Action Plan include the following:

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

In addition, St. Louis County is looking into utilizing tax forefit property to ameliorate housing development.

Discussion

No further discussion.

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

Introduction

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

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

Actions planned to address obstacles to meeting underserved needs

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

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

Actions planned to foster and maintain affordable housing

See section AP-75 above

Actions planned to reduce lead-based paint hazards

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

preventative measures regarding lead-based paint.

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

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

Actions planned to reduce the number of poverty-level families

Activities funded in the 2024 Action Plan that support poverty-level families are as follows:

- One Roof Community Housing – acquisition/rehab/resale project
- Habitat for Humanity - rehabilitation and resale project
- Entrepreneur Fund – microenterprise business development technical assistance
- Five infrastructure projects that reduce community cost to aid with increasing utility costs for families
- Three community facility projects to address safety issues and create accessibility for persons with a physical disability or mobility impairment
- AEOA Homeless Shelter and Homeless Youth programs
- Legal Aid Housing Counseling program
- Range Transitional Housing
- Salvation Army meals programs in Hibbing and Virginia
- Sexual Assault and Advocates for Family Peace youth programs
- SOAR Career Solutions - employment training
- Project Care Free Clinic – provides free healthcare to uninsured and under insured clients
- Quad City Food Shelf
- United Way of NE MN - Smiles United program that provides free dental care to uninsured and under insured clients
- United Way of NE MN - Buddy Backpack program provides shelf stable food to LMI kids over the weekend

Actions planned to develop institutional structure

No new initiatives are planned to develop the institutional structure. While the geographic area of the

County and Consortium is large, contact between agencies is regular through use of electronic means. Agencies are also of a scale that know each other personally and work closely together.

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

Maintain participation in and connection with the existing communication networks of housing and service provider agencies. Staffing reductions by all agencies connected to these networks has built agency interdependence and collaborative effort. Outside Duluth, there is little overlap of service providers necessitating this collaboration. Continue to be part of the Northern St. Louis County Housing Summit group.

Discussion

No further discussion.

Program Specific Requirements

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

Introduction

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The table that follows identifies program income projected to be received during the 2024 program year.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	30,000
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	30,000

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	99.23%

HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.220(I)(2)

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

as follows:

The SLC HRA funds a variety of different projects throughout the year including new housing development and housing studies. These funds are levy dollars.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

Included in the appendix

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

Included in the appendix

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

Not applicable

5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).

Not applicable

6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).

Not applicable

7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that

limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).

No preference or limitation present.

Emergency Solutions Grant (ESG)

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

Included in the appendix

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

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

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

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

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

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

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

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

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

5. Describe performance standards for evaluating ESG.

Included in the appendix

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

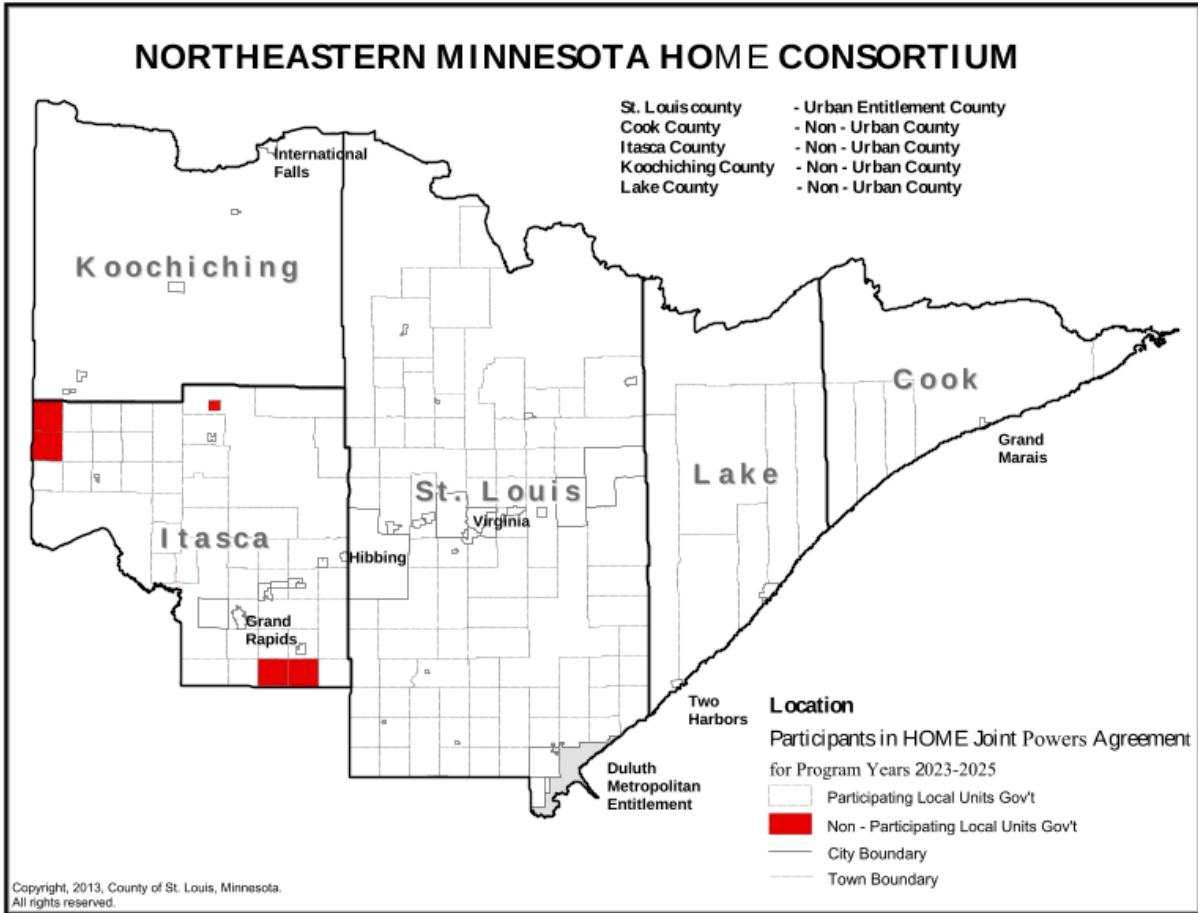
Attachments

Grantee Unique Appendices

Goal	Objective	Agency	Expected #	Source	2024	Totals
1	DH-1	AEDA-HDAP education	195	COBG	-	
Housing Development						
2	DH-1	Habitat	5	COBG	60,000	
		One Roof - CHDO (w/COBG)	2	HOME	159,416	
	DH-1	KOOTASCA CHDO	2	HOME	259,416	
		Housing Development Fund	-	HOME	-	
		Total	9			478,832
Home Ownership Assistance						
3	DH-2	AEDA/KOOT-HOAP		HOME		-
Housing Rehab						
4	DH-3	AEDA SFR	60	COBG	260,000	
	DH-3	Cook-HRA	24	COBG	15,000	
	DH-1	One Roof	2	COBG	100,000	
	DH-3	AEDA CHDO	12	HOME	359,415	
		Total	98			734,415
Public Services						
5	SL-1	Advocates for Family Peace	300	COBG	18,000	
		AEDA Shelter	277	COBG	43,000	
		AEDA Youth Services	30	COBG	20,000	
		Justice North/Legal Aid	405	COBG	30,000	
		Project Care Free Clinic	700	COBG	20,000	
		Quad City Food Shelf	7,200	COBG	18,000	
		RTH	129	COBG	30,000	
		SA-Hibbing	13,000	COBG	18,000	
		SA-Virginia	26,000	COBG	18,000	
		Sexual Assault	330	COBG	25,000	
		United Way: Buddy Backpack	1,200	COBG	9,000	
		United Way: Smiles Limited	1,650	COBG	13,000	260,000
		Street Outreach - RTH	30	ESG		
		Rapid Re-Housing - AEOA/RTH	171	ESG	97,832	
		Homeless Prevention - JN	40	ESG	15,000	
		Emergency Shelter - AEOA	145	ESG	44,063	
		HMS		ESG	3,467	
		Total	51,221			260,362
Public Infrastructure						
6	SL-3	Aurora	1,697	COBG	60,000	
		Bretling	240	COBG	75,000	
		Ely	3,233	COBG	200,000	
		Hibbing PUC	16,000	COBG	275,000	
		Tower	25	COBG	232,500	
		Total	21,165			822,500
		Count	5			
Facility - Accessibility						
7	SL-1	Chisholm Memorial Park	1	COBG	70,000	
	SL-1	Mesabi Fit Coalition	1	COBG	75,326	
		Total	2			145,326
Facility - Improvements						
8	SL-1	Range Mental Health	1	COBG	130,000	
	SL-3	NRP	-	COBG	-	
		Total	1			130,000
Facility - Demo/Clearance						
		Total	-			-
Micro-enterprise						
9	EO-1	Entrepreneur Fund	50	COBG	20,000	20,000
Job Training						
10	EO-1	SOAR	49	COBG	20,000	20,000
						2,771,435
	Grant	Admin		Program Income		Projects
COBG	1,937,596		387,519	282,749		1,852,626
HOME	478,542		47,854	349,359		778,247
ESG	173,364		13,022			160,362
						2,771,435

Table 3B Numbers		2024	
Rental	Agency	Source	Number
Acquisition of Existing			0
Production of New	KOOTASCA CHDO	HOME	2
Rehab Existing	Cook HRA AEOA CHDO	CDBG	24
		HOME	12
		Total	36
Rental Assist			0
		Total Rental	38
Owner-Occupied			
	Agency	Source	Number
Acquisition of Existing	One Roof	CDBG	2
	HDF	HOME	0
	One Roof	CHDO	2 included with CDBG
			4
Production of New	Habitat	CDBG	5
Rehab Existing	AEOA	CDBG	60
		Total	60
Homebuyer Assist	AEOA/KOOT	HOME	0
		Total Owner	69
		Total All	107
Homeless Households			
Acquisition of existing			4
Production of new			7
Rehab			96
	Totals		107

NORTHEASTERN MINNESOTA HOME CONSORTIUM



Northeast Minnesota HOME Consortium Home Ownership Assistance Program Recapture Guidelines

1. Introduction

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

2. Recapture Requirements: Homebuyer Assistance

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

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

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

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

HUD Approved 12/5/2017

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

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

HUD Approved 12/5/2017

Northeast Minnesota HOME Consortium Resale Guidelines

Introduction

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

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

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

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

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

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

Definitions

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

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

6/3/2019
Approved 6/12/2019

Resale Requirements

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

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

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

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

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

6/3/2019
Approved 6/12/2019

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

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

Noncompliance Requirements

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

Preservation of Affordable Housing

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

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

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

6/3/2019
Approved 6/12/2019

Resale Price Calculation and Reasonable Return to the Homebuyer

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

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

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

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

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

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

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

Example:

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

6/3/2019
Approved 6/12/2019

St. Louis County Emergency Shelter Grant Program ESG Performance Standards

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

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

Rapid Re-housing Outcomes
<ul style="list-style-type: none"> Participants will be re-housed into stable housing within 30 days of eligibility determination for services Participants receiving rapid re-housing will not become homeless during services or within six months of case closing
Source of evaluation data: HMIS reports
Homelessness Prevention Outcomes
<ul style="list-style-type: none"> Eligible renter households will not become homeless Homeless families, adults, and youth will retain stable, permanent housing Households receiving services will not become homeless during the six months following case closing
Source of evaluation data: HMIS reports
Termination of the Subrecipient ESG Written Agreement
<ul style="list-style-type: none"> Either party may terminate this Agreement at any time, without cause, in whole or in part, by giving written notice to the other party of such termination and specifying the effective date thereof at least 30 days before the effective date of such termination The parties may terminate this Agreement, in whole or in part, at any time by mutual written consent specifying the effective date of such termination The County may terminate this Agreement, in whole or in part, with ten days written notice to the Subrecipient if the Subrecipient materially fails to comply with any term of this Agreement, or if reasonable progress has not been made by the Subrecipient in accomplishing the purposes of this Agreement The County may terminate this Agreement immediately, in whole or in part, if the County is in receipt of a notice of loss of federal funding for the Emergency Solutions Grant Program. The Subrecipient will be notified as soon as possible In the event of any termination, all unused grant funds held by the Subrecipient will be returned to the County. All finished or unfinished documents, data, studies, surveys, maps, models, photographs, reports or other materials prepared by the Subrecipient under this Agreement will, at the option of the County, become the property of the County. The Subrecipient will be entitled to receive just and equitable compensation for any satisfactory work completed on such documents or materials Any decision to terminate will be made on behalf of the County by the County Planning and Community Development Director who will execute any agreement or notice to terminate

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

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

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

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

- a. St. Louis County does not target ESG funding to geographic areas or client populations. ESG subrecipients are selected through a request for proposal process based on service provision. No duplication of service by subrecipient is anticipated in the St. Louis County area of operation.
- b. ESG funding may be used for costs of providing essential services necessary to reach out to unsheltered homeless people; connect them with emergency shelter, housing, or critical services; and provide urgent, non-facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility. For the purposes of this section, the term "unsheltered homeless people" means individuals and families who qualify as homeless under paragraph (1) (i) of the "homeless" definition under 24 CFR Part 576.2. As outlined in 24 CFR Part 576.101, essential services consist of:
 - i. Engagement;
 - ii. Case management;

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

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

- a. Emergency Shelter Definition: The term Emergency Shelter was revised by 24 CFR Part 576.2 to mean “any facility, the primary purpose of which is to provide a temporary shelter for the homeless in general or for specific populations of the homeless and which does not require occupants to sign leases or occupancy agreements. This definition excludes transitional housing. However, projects that were funded as an emergency shelter (shelter operations) under the FY 2010 Emergency Shelter Grants program may continue to be funded under the emergency shelter component under the Emergency Solutions Grants program, regardless of whether the project meets the revised definition.
- b. Admission, Diversion, Referral and Discharge
- Shelter stays should be avoided, if possible, and when not possible, limited to the shortest time necessary to help participants regain permanent housing. Consistent with Section (a) of this document, ESG subrecipients must conduct an initial evaluation of all individuals or families to determine if they should be admitted to an emergency shelter, diverted to a provider of other ESG-funded components, such as rapid re-housing or homeless prevention assistance, or referred for other mainstream resources.
- c. ESG subrecipients must determine that individuals and families meet category (1), (2), (3), or (4) of the Homeless Definitions listed below and rate the individual's or family's vulnerability to ensure that only those individuals or families that have the greatest need for emergency shelter assistance receive ESG funded assistance.
- i. Category 1 – Literally Homeless
 - ii. Category 2 – Imminent Risk of Homeless
 - iii. Category 3 – Homeless Under Other Federal Statutes
 - iv. Category 4 – Fleeing/Attempting to Flee DV

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

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

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

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

5. **Policies and procedures for coordination among emergency shelter providers, essential service providers, homelessness prevention and rapid re-housing assistance providers, other homeless assistance providers, and mainstream service and housing providers**
 - a. Coordination to assist the homeless and prevent homelessness comes through collaboration among the Heading Home Leadership Council, St. Louis County Continuum of Care service providers, Rural Housing Coalition, Affordable Housing Coalition, and staff of St. Louis County and Duluth. Active engagement in the CoC and Rural or Affordable housing coalition is strongly encouraged.

6. **Policies and procedures for determining and prioritizing which eligible families and individuals will receive homelessness prevention assistance and which eligible families and individuals will receive rapid re-housing assistance**
 - a. ESG-funded agencies will be responsible for ensuring that potential participants are served in order of contact, with provisions for priority service for eligible households who meet priority criteria set forth by the agency.

 - b. The key to the success of the continuum of care strategy is in the common screening and assessment process developed by the St. Louis County Continuum of Care. Screening and assessment thoroughly explores a family's or individual's situation and pinpoints their unique housing and service needs. Based upon the assessment, families and individuals should be referred to the kinds of housing and services most appropriate to their situations and need.

 - c. The common assessment tool aids matching individuals and families with the most appropriate assistance. Under homelessness prevention assistance, funding is available to individuals and families below 30% of Area Median Income (AMI), and are homeless or at risk of becoming homeless.

 - d. ESG funding can be used to prevent an individual or family from becoming homeless and regain stability in current housing or other permanent housing. Rapid re-housing funding is available to aid those who are literally homeless progress toward permanent housing and achieve housing stability.
 - i. Homeless Prevention Households will be re-certified for continued eligibility every 3 months.
 - ii. Rapid Re-Housing Households will be re-certified annually.

7. **Standards for determining the share of rent and utilities costs that each program participant must pay, if any, while receiving homelessness prevention or rapid re-housing assistance**
 - a. Standards for both homelessness prevention and rapid re-housing for determining the share of rent and utilities costs that each program participant must pay, if any, will be based on the following:

- i. Clients receiving rental assistance are expected to contribute 30% of their income toward the unit's rent. The St. Louis County ESG Program does not require a minimum client contribution.
 - ii. Rental assistance cannot be provided for a unit unless the rent for that unit is at or below the current Fair Market Rent limit, established by HUD.
 - iii. The rent charged for a unit must be reasonable in relation to rents currently being charged for comparable units in the private unassisted market and must not be in excess of rents currently being charged by the owner for comparable unassisted units. See 24 CFR 574.320.
 - iv. The rental unit must meet minimum habitability standards found at 24 CFR 576.403.
 - v. There must be a rental assistance agreement and lease between the property manager and tenant as well as the owner of property and ESG subrecipient.
 - vi. No rental assistance may be made to an individual or family that is receiving rental assistance from another public source for the same time period.
 - vii. Rental assistance may not be provided to a participant who is currently receiving replacement housing payments under Uniform Relocation Assistance
- b. Per 24 CFR 576.106 (e), ESG subrecipients may make rental assistance payments only to an owner with whom the subrecipient has entered into a rental assistance agreement. The rental assistance agreement must set forth the terms under which rental assistance will be provided, including the requirements that apply under this section. The rental assistance agreement must provide that, during the term of the agreement, the owner must give the subrecipient a copy of any notice to the program participant to vacate the housing unit, or any complaint used under state or local law to commence an eviction action against the program participant.
- 8. Standards for determining how long a particular program participant will be provided with rental assistance and whether and how the amount of that assistance will be adjusted over time**
- a. Subject to the general conditions under 24 CFR 576.103 and 24 CFR Part 576.104, ESG subrecipients may provide a program participant with up to 24 months of rental assistance during any 3-year period. This assistance may be short-term rental assistance, medium-term rental assistance, payment of rental arrears, or any combination of this assistance.
 - b. Short-term rental assistance is assistance for up to 3 months of rent. Medium-term rental assistance is assistance for more than 3 months but not more than 24 months of rent. Payment of rental arrears may consist of a one-time payment for up to 6 months of rent in arrears, including any late fees on those arrears.

- c. The maximum amount of rental assistance provided and, an individual or family's level of responsibility for rent payments, over time, shall be determined by the ESG subrecipient and shall be reflective of the individual or family's need for rental assistance and the level of financial resources available to the ESG subrecipient.
 - d. Rental assistance will end if and when other subsidy begins, such as Section 8 Housing Choice Voucher, public housing, or project based rental subsidy.
 - e. Guidance from the Heading Home Leadership Council, Affordable Housing Coalition, and Rural Housing Coalition will aid with evaluation and modification of rental assistance based on community need, outcomes, and available budget within the HUD guidelines.
9. **Standards for determining the type, amount, and duration of housing stabilization and relocation services to provide a program participant, including the limits, if any, on the homelessness prevention or rapid re-housing assistance that each program participant may receive, such as the maximum amount of assistance, maximum number of months the program participants receives assistance; or the maximum number of times the program participants may receive assistance**
- a. Subject to the general conditions under 24 CFR 576.103 and 24 CFR Part 576.104, subrecipients may use ESG funding to pay housing owners, utility companies, and other third parties for some or all of the following costs, as allowed under 24 CFR 576.105:
 - i. Rental application fees
 - ii. Security deposits
 - iii. Last month's rent
 - iv. Utility deposits
 - v. Utility payments
 - vi. Moving costs, and
 - vii. Some limited services costs
 - b. Consistent with 24 CFR 576.105 (c), ESG subrecipients determine the type, maximum amount and duration of housing stabilization and relocation services for individuals and families who are in need of homeless prevention or rapid re-housing assistance through the initial evaluation, re-evaluation and ongoing case management processes.
 - c. Consistent with 24 CFR 576.105(d), financial assistance for housing stabilization and relocation services cannot be provided to a program participant who is receiving the same type of assistance through other public sources or to a program participant who has been provided with replacement housing payments under the Uniform Relocation Act (URA) during the period of time covered by the URA payments.

10. Standards for terminating ESG assistance to program participants.

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

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

Termination Guidelines and Procedures

Guidelines:

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

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

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

Procedures:

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

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

Grievance/Appeal Guidelines and Procedures

Guidelines:

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

Procedures:

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

