



# Home American Rescue Plan: Allocation Plan

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## Introduction

In 2021, the HOME-American Rescue Plan (HOME ARP) was introduced, providing \$5 billion in funding across the nation to support affordable housing initiatives. Its objectives include investing in permanent affordable rental housing, upgrading shelter facilities to include non-congregate shelter, and providing tenant-based rental assistance and supportive services. HOME ARP funds are intended to benefit specific "qualifying populations" (QPs), listed below:

- Individuals and families experiencing homelessness, as defined by the McKinney Act and in 24 CFR 91.5 (paragraphs 1-3)
- Individuals and families at risk of homelessness, as defined by the McKinney Act and in 24 CFR 91.5
- Individuals and families fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, and/or human trafficking
- Other populations that may significantly benefit from supportive services or rental assistance, as a preventive measure against homelessness or for those who are most susceptible to housing instability.

To achieve these objectives, this program drew upon the lessons learned from various existing housing programs, such as HOME, Continuum of Care (CoC), ESG (Emergency Solutions Grant), and Housing Counseling programs. HOME ARP follows regulations established in the [HOME ARP Implementation Notice \(Notice\)](#).

Under this program, Minnesota Housing has been allotted \$31,137,836. However, prior to receiving the funds, Minnesota Housing must carry out a comprehensive allocation planning process that includes a series of consultations, a thorough needs assessment and gaps analysis based on current data, and virtual listening sessions, in addition to holding a public hearing and gathering public feedback. These steps are pivotal to effectively utilizing the HOME ARP funds, specifically in addressing the unique needs of the entire state of Minnesota. Through these consultations and hearings, valuable insights and recommendations from residents, organizations, and community members were acquired, which in turn, informed the decision-making process and ultimately, will help maximize the results of the funding.

## Consultation

Hearing from communities throughout the State of Minnesota is integral in designing the strongest HOME ARP allocation plan to meet community needs. External engagement activities fulfilled all HOME ARP consultation and public participation requirements. Minnesota Housing leveraged standing meetings as much as possible to solicit input from community members without adding a time burden or duplicating efforts. Consultation efforts occurred in three primary methods, all of which included written materials covering a basic overview of HOME ARP that were published on the Minnesota Housing website. These materials oriented the community to the funding opportunity including a description of the qualified populations and eligible activities, what feedback is needed and how input would be used for program creation. Community members were provided multiple methods and spaces to provide detailed feedback in the consultation methods below.

- 1. Virtual Listening Sessions.** Eleven virtual listening sessions were held between December 7, 2022, and January 31, 2023. Each lasted up to one hour in length using virtual interactive and accessible engagement tools such as Mentimeter and/or JamBoard to gather and document insights from participants. Each session began with an overview of HOME ARP funding, followed by a guided discussion focused on the needs and gaps related to the HOME ARP qualifying populations and eligible activities allowing for in-depth feedback and opportunities to engage on issues key to the select representatives.
- 2. Historically Excluded Partners Interviews.** To incorporate the voice of marginalized community members, Minnesota Housing conducted informational interviews with various representatives from historically excluded communities to gain additional insight on identified service gaps within the existing homelessness and housing systems related to HOME ARP eligible activities. In furthering the values of equity and inclusion in the planning process, community members engaged through trusted and culturally competent community experts to ensure all voices had a safe space to provide insights and solutions. Individual interviews included the same HOME ARP overview provided in the Virtual Listening Sessions to ensure equitable access to information.
- 3. Surveys.** To increase accessibility and ease providing input, a virtual survey was made available through Minnesota Housing's survey platform as an additional method for gathering feedback on the use of HOME ARP. The survey was distributed with the same HOME ARP overview included in Fact Sheets provided to consultation participants. Respondents could indicate which HOME ARP eligible activities exist within the state, activities that are most needed, recommended preferences for subsets of HOME ARP qualifying populations (QP), and potential collaborations for administering HOME ARP. Respondents were invited to share their views on the impact of those activities within their communities and the statewide systems. To expand public input and participation, the survey was also translated into Hmong, Spanish, and Somali. The survey questions are in the appendix of this Plan.

## Consultation Summary

Collectively, through 11 consultations with over 170 organizations and over 400 individuals, community organizations and required consultation groups were informed of the funding opportunities and asked for feedback regarding unmet needs, cultural and racial disparities, preferred eligible activities and potential preferences for qualifying populations. Organizations and individuals participated from throughout Minnesota, resulting in clear urban and rural engagement and feedback. These consultations were all conducted virtually to increase accessibility for interested organizations and individuals to attend. A full list of organizations can be found in the Appendix.

## Consultation Meeting Schedule and Summaries

Date	Types of Organizations	Top 2 Activities	Feedback from Participants
<b>12/7/2022: Minnesota Interagency Council on Homelessness</b>	<ul style="list-style-type: none"> <li>Continuums of Care Leadership</li> <li>Domestic violence service providers</li> <li>Homeless services provider</li> <li>Public agency that addresses the needs of the qualifying populations (All QPs)</li> </ul>	1. Affordable Rental Housing	Affordable housing was the highest priority need for this group, followed by supportive services overall. However, when focused on specific qualifying populations like those experiencing homelessness the need for tenant-based rental assistance outpaced supportive services as the second priority.
	<ul style="list-style-type: none"> <li>Public or private organizations that address civil rights</li> <li>Public or private organizations the address fair housing</li> <li>Public or private organizations that address the needs of persons with disabilities</li> <li>Public housing authority</li> <li>Veterans Groups</li> <li>Public housing authority</li> </ul>	2. Supportive Services & Tenant Based Rental Assistance (tied)	
<b>12/21/2022: Minnesota Housing's Equity Action Committee</b>	<ul style="list-style-type: none"> <li>Public agency that addresses the needs of the qualifying populations (All QPs)</li> </ul>	1. Affordable Rental Housing	Increasing affordable housing was a top need in this group especially deeply affordable units for those with the lowest incomes in safe and amenity rich areas. Increasing housing stock can provide choice on where people would like to live based on their support systems and community. Supportive services should be made broadly available that are culturally and linguistically appropriate.
		2. Supportive Services	

Continued) Date	Types of Organizations	Top 2 Activities	Feedback from Participants
<b>12/29/2022 &amp; 1/13/23: Continuum of Care Leadership</b>	<ul style="list-style-type: none"> <li>Continuums of Care that covers the State of Minnesota</li> </ul>	1. Affordable Rental Housing	<p>The lack of affordable housing and low barrier shelter is a significant concern as the needs of those experiencing homelessness continue to increase. The development of new housing units particularly with supportive services that are culturally specific would have a great impact. Rental assistance is an important tool to ending homelessness but hard to fully use without additional housing stock. Non-congregate shelter options are sparse and particularly difficult in remote and rural areas. Capacity building of non-profits to both expand services and retain current staff is desperately needed. Using funds to support Coordinated Entry systems can help with priority list management and assessment.</p>
		2. Supportive Services & Non-Congregate Shelter (tied)	
<b>1/3/23: Regional Experts Network</b>	<ul style="list-style-type: none"> <li>Persons with Lived Experience with Homelessness and Housing Instability</li> </ul>	1. Affordable Rental Housing	<p>This group discussed the need for supportive services and programs to focus on housing stability that can be flexible for housing crises and prevent returns to homelessness, including recognizing a person's friends and relatives as supports. The rehabilitation of current affordable housing to increase safety and the repurposing of abandoned buildings for potential shelters were also discussed.</p>
2. Supportive Services			

Continued) Date	Types of Organizations	Top 2 Activities	Feedback from Participants
<b>1/6/23: Family Homeless Prevention and Assistance Program Grantees</b>	<ul style="list-style-type: none"> <li>• Domestic violence service providers</li> <li>• Homeless services provider</li> <li>• Public agency that addresses the needs of the qualifying populations (All QPs)</li> <li>• Public or private organizations that address civil rights</li> </ul>	1. Affordable Rental Housing	<p>The group described a lack of affordable housing for people with barriers, low-income households, and young adults. People are struggling to find decent housing and have a long waitlist for available affordable housing. Feedback also mentions a lack of landlords willing to rent to people with high barriers and lack of support services such as transportation and case management. Additionally, there is a lack of funding for non-profits and a lack of culturally appropriate services in the community.</p>
	<ul style="list-style-type: none"> <li>• Public or private organizations the address fair housing</li> <li>• Public or private organizations that address the needs of persons with disabilities</li> <li>• Tribal Nation/Government</li> </ul>	2. Supportive Services	
<b>1/11/23: Homeless Service Providers</b>	<ul style="list-style-type: none"> <li>• Healthcare agency</li> <li>• Homeless services provider</li> <li>• Housing Developer</li> <li>• Persons with Lived Experience with Homelessness and/or Housing Instability</li> </ul>	1. Affordable Rental Housing	<p>The group described the need for affordable housing and related services for a variety of populations, including immigrants and refugees, single male headed households with children, people with justice involvement, and those experiencing homelessness. Specific issues mentioned include a lack of rental assistance, affordable units that accept vouchers, and non-congregate shelter space. Group members also highlighted a lack of affordable housing units, safe reentry housing for those leaving incarceration, and education for landlords. CE systems could use funding to keep up with need. There is also a need for services for those with severe mental health and physical conditions, and support for individuals with criminal backgrounds, poor credit, or housing references. Many cited rental amounts are often above fair market rent, making it difficult for people to use their vouchers.</p>
	<ul style="list-style-type: none"> <li>• Public agencies that address the needs of qualifying populations (All QPs)</li> <li>• Public or private organizations that address civil rights</li> <li>• Survivors of human trafficking service provider</li> <li>• Tribal Nation/Government</li> </ul>	2. Supportive Services	



Continued) Date	Types of Organizations	Top 2 Activities	Feedback from Participants
<b>1/18/23: Housing Stability Roundtable</b>	<ul style="list-style-type: none"> <li>Community Action Agency</li> </ul>	1. Affordable Rental Housing	<p>The group described the lack of affordable housing and available units is a major barrier for housing stability. Investing in existing housing stability services could help expand current services to meet the demand, especially with access to prevention funds or rental arrears that would allow households to maintain their current residence. Included in supportive service is the need for increased support for renters' rights and education. The group recognized a need for more shelters for all populations including single individuals, families, and youth.</p>
	<ul style="list-style-type: none"> <li>Continuums of Care</li> </ul>		
	<ul style="list-style-type: none"> <li>Domestic violence service provider</li> </ul>		
	<ul style="list-style-type: none"> <li>Homeless services provider</li> </ul>		
	<ul style="list-style-type: none"> <li>Public agency that addresses the needs of qualifying populations (All QPs)</li> </ul>		
<b>1/19/23: Housing Developers</b>	<ul style="list-style-type: none"> <li>Housing Developers</li> </ul>	1. Affordable Rental Housing	<p>Affordable housing is the highest need in the state as evidenced by the sheer number of calls for vouchers/affordable units that current properties receive that are unable to be placed. Federal payment standards for tenant based rental assistance and vouchers have not kept pace with the market rent. There is a need for long-term capital for construction gap financing and operating subsidies for supportive services. Providing capital funds to create housing that is not debt based would allow for a hold on low rent. Supportive services for housing developments with people with service needs are not well funded and difficult to access. Tenant based rental assistance could reduce rent burden.</p>
		2. Supportive Services	

Continued) Date	Types of Organizations	Top 2 Activities	Feedback from Participants
1/20/23: Public Housing Authorities	<ul style="list-style-type: none"> <li>Public housing agencies</li> </ul>	1. Affordable Rental Housing	<p>The need to increase the affordable housing stock is key to improving access to housing. Supportive services are necessary to increase success and stability once a person is housed, especially for those with disabilities.</p>
		2. Supportive Services	
1/25/23: Legal Services	<ul style="list-style-type: none"> <li>Homeless services provider</li> </ul>	1. Tenant-Based Rental Assistance	<p>Rental assistance in the form of TBRA is a top need identified by this group as many households continue to have increased rental arrears and face evictions with limited resources. Increasing affordable housing and being creative in the type of housing is a need, such as manufactured homes where residents can own rather than rent land. Supportive Services in the form of financial assistance as well as legal services can help households retain housing by assisting with linkages to services, navigating legal system, and increasing tenant education.</p>
	<ul style="list-style-type: none"> <li>Public agencies that address the needs of qualifying populations (All QPs)</li> </ul>		
	<ul style="list-style-type: none"> <li>Public or private organizations that address civil rights</li> <li>Public or private organizations the address fair housing</li> <li>Veterans Group</li> </ul>	2. Affordable Rental Housing	
1/31/23: Tribal Consultation	<ul style="list-style-type: none"> <li>Tribal Nation/Government</li> </ul>	1. Affordable Rental Housing	<p>This group identified the need for rental housing on Tribal lands as a large need as well as housing options for Elders, transitional housing, and rental houses and apartments. Supportive Services that can support those living in rural communities with needs like non-medical transportation. Non-congregate shelters or units would help fill a gap in shelter capacity.</p>
		2. Tenant-Based Rental Assistance	

## Summary of Unmet Needs

Below is a summary of the feedback received from virtual consultations that took place between December 7, 2022, through January 31, 2023, organized by eligible activities under HOME ARP funding. Consultations occurred with Tribal Nations' leadership, individuals with lived experience, Continuums of Care (CoCs) serving Minnesota, housing developers, homeless, domestic violence, human trafficking and sexual assault service providers, veterans' groups, public housing agencies, public, private and non-profit agencies that address the need of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities.

### Affordable Housing

Increased affordable housing is a priority need affecting communities across the State of Minnesota. According to the consultations, the affordable housing stock is not adequate to meet the increasing number of households within all qualifying populations in need of safe and stable housing. In addition to available units, providers struggle to spend down rental assistance funds or lease-up vouchers due to a shortage of deeply affordable units with low barrier application and resident selection processes. The current affordable housing stock has rehabilitation needs, a lack of variety in unit sizes to accommodate both large and small households, and locations that have limited amenities like grocery stores, public transit, etc. Admission criteria that is more flexible is critical to remove barriers to housing options for those with low credit scores, justice-involved backgrounds, lack of stable rental history and other requirements of traditional property management systems. More affordable housing stock that can meet the needs of seniors and persons with disabilities is also a need.

Deeply affordable units for those making less than 30% Area Median Income (AMI), where culturally appropriate support can be put into place, are in high demand. Culturally appropriate services include offering linguistically appropriate support (both orally and written), improving cultural competence of staff, and developing a diverse workforce that better reflects those served by the program. Due to the lack of affordable housing units, households looking for housing options in lower income brackets lose the privilege of choice, especially the ability to remain in areas where they have natural and culturally specific supports.

Current housing stock is aging and funds to improve and rehabilitate affordable housing are needed to provide safe and sustainable housing across the State.

### Supportive Services

Supportive services to assist households to reach and maintain housing stability are also a crucial need. Services focused on the Housing First and Harm Reduction models are needed, as well as increased culturally appropriate and language appropriate services for communities throughout the State of Minnesota. Communities in Greater Minnesota frequently cited geographic distance as a major barrier to services as there are often not enough participants in one area to justify a full-time staff member. However, the expansive geography in Greater Minnesota is a barrier for one full-time worker, resulting in more time spent traveling and high transportation costs. The distance is compounded when discussing the needs of specific cultural groups, as culturally appropriate services are not widely available in all areas. This creates a need for culturally sensitive and culturally competent supportive services for participants, with an additional strain in more rural areas where it is harder to support hiring full-time staff for specific geographic areas. Accessible transportation is a consistent concern of providers in Greater Minnesota.

## Tenant Based Rental Assistance (TBRA)

The need for Tenant Based Rental Assistance has been significantly felt throughout the pandemic with rising rents and inflation leading to households struggling to keep up with costs. With many pandemic funding sources nearing the end with continued demand, TBRA could provide relief on rent burden. TBRA funds focusing on prevention services to help support housing stability are critical. Increased landlord engagement and tenant education is needed for an increase in TBRA funds to be utilized effectively in Minnesota.

## Non-Congregate Shelter

According to consultation feedback, there are gaps in shelter that vary across the state, with Greater Minnesota and tribal lands experiencing a higher lack of shelter options. Emergency shelter needs also vary across the state, with some Greater Minnesota communities stating they have little to no low barrier shelter available in the community, while some metro areas explicitly named the non-congregate shelter model as an operational need. Many areas are seeing an increase in those experiencing homelessness, while the number of shelter beds has remained stagnant for some time. Non-congregate shelter beds could also provide emergency shelter needs to specified subpopulations like families, those fleeing domestic violence, dating violence, sexual assault or human trafficking, and individuals with severe mental health symptoms who may not be as comfortable in a congregate shelter program.

## Non-Profit Capacity Building

Throughout the State, non-profit providers are struggling to retain staff and maintain their capacity to match increasing needs. Staffing and capacity concerns were also discussed in many consultation meetings, with the need for livable wages for those serving the qualified populations that could use this program funding, as well as support, training, and education opportunities for staff.

## Racial and Ethnic Disparities

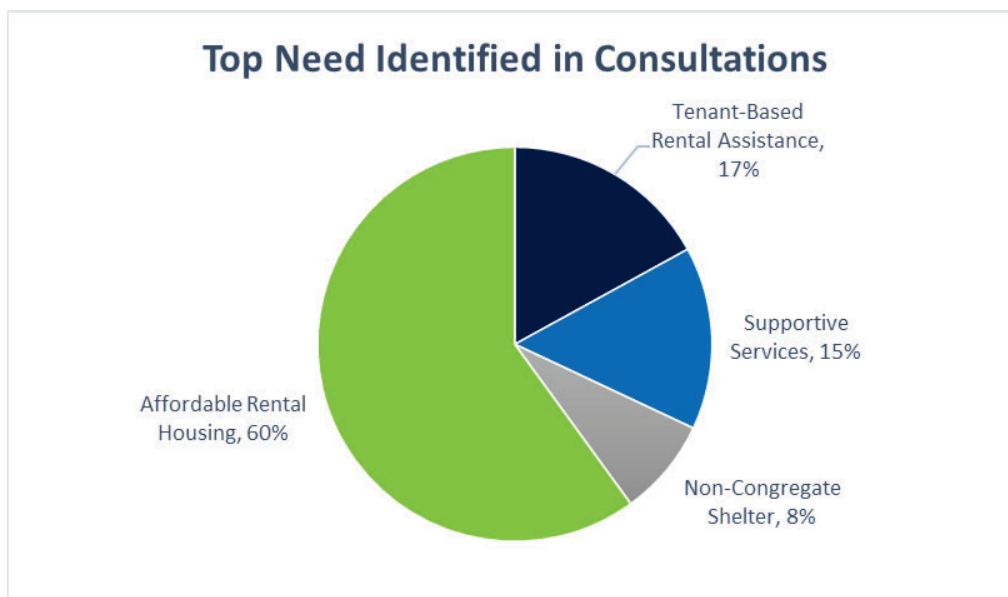
As a part of the consultation process, participants were asked to identify racial disparities that are not being addressed in their current system. The greatest disparities were noted for Black and Indigenous communities especially as it relates to their overrepresentation of the community in homeless services and the justice system. Minnesota has a rich diversity of communities across the State and a number of culturally specific services available to residents, yet there are noted gaps of culturally specific services evenly across the state. Compounded with the lack of affordable housing, some households move outside their region for housing and lose the cultural and linguistic community that enhances housing stability.

There are increased challenges in accessing housing with strict parameters on identification documents accepted and language barriers when applying for units. In some areas, unit sizes are not large enough to accommodate multi-generational or larger families. And when facing potential eviction, there is a lack of support in navigating tenant rights and the legal system.

## Prioritization of HOME ARP Eligible Uses

During consultations, participants were asked to prioritize eligible uses of HOME ARP specifically: affordable rental housing, tenant-based rental assistance, supportive services, non-congregate shelter, and non-profit operating and capacity building. Non-profit operating and capacity building can only be awarded to an eligible entity that is also awarded HOME ARP funds for another HOME ARP activity.

From these results affordable housing is the top-ranked eligible activity across all consultation groups accounting for 60% of all votes. Supportive Services and Tenant-Based Rental Assistance came in close second with approximately 15% each, followed by non-Congregate shelter. Affordable Rental Housing and Tenant-Based Rental Assistance are consistently important across all consultation groups, while Supportive Services and Non-Congregate Shelter have more varied levels of importance.



### Potential Preferences

Additionally, participants were asked to rank qualifying populations based on current needs and potential preferences that the State could use in allocating HOME ARP funds. Out of the eleven consultation groups, six groups identified those experiencing homelessness as a priority qualifying population. In addition, those at risk of homelessness and those fleeing domestic violence and human trafficking were also identified as potential qualifying populations where a preference would help fill gaps. Many participants highlighted the need for flexible options and tailored solutions for the diverse needs of individuals and families throughout Minnesota, therefore recommending the State not set a preference.

The feedback captured in all consultation sessions highlights that different groups have varying priorities regarding who should be prioritized for access to HOME ARP projects, especially as it relates to subpopulations of the qualifying populations. Themes emerged about the racial disparity in the experience of homelessness for both Black and Native identifying individuals. Additionally, individuals with mental health needs face difficulties in accessing assistance and would benefit from a preference. Finally, participants discussed the need to prioritize families, single adults, people of color, low-income families and individuals, and youth aging out of foster care. It was also mentioned that seniors and people with criminal backgrounds may require a preference.

## Community Survey

A survey was posted on the Minnesota Housing website to increase access for all interested parties to provide feedback. Questions mirrored those used during the virtual listening sessions. The survey was translated into Spanish, Somali and Hmong to improve access to those who are most comfortable in languages other than English. The survey link was also sent via eNews on January 13, 2023, and was open for responses until January 31, 2023. Minnesota Housing received over 180 responses.

### Summary of Unmet Needs

The survey structure asked about unmet needs based on the HOME ARP qualifying population definitions to identify any themes or differences in need across the populations. An overview of the responses is in the table below.

Highest Unmet Need	Those Experiencing Homelessness (QP1)	Those At Risk of Experiencing Homelessness (QP2)	Those Fleeing or Attempting to Flee DV/Human Trafficking (Qp3)
Access to Immediate Emergency Shelter	19%	4%	45%
Access to Rental Assistance	10%	31%	6%
Access to safe and affordable housing	52%	41%	33%
Access to supportive services for housing stability	19%	24%	15%

According to the survey results, the top need identified by respondents for persons experiencing homelessness was affordable rental housing, which accounted for over 50% of responses. Supportive services and access to immediate emergency shelter were also identified as important needs for this population.

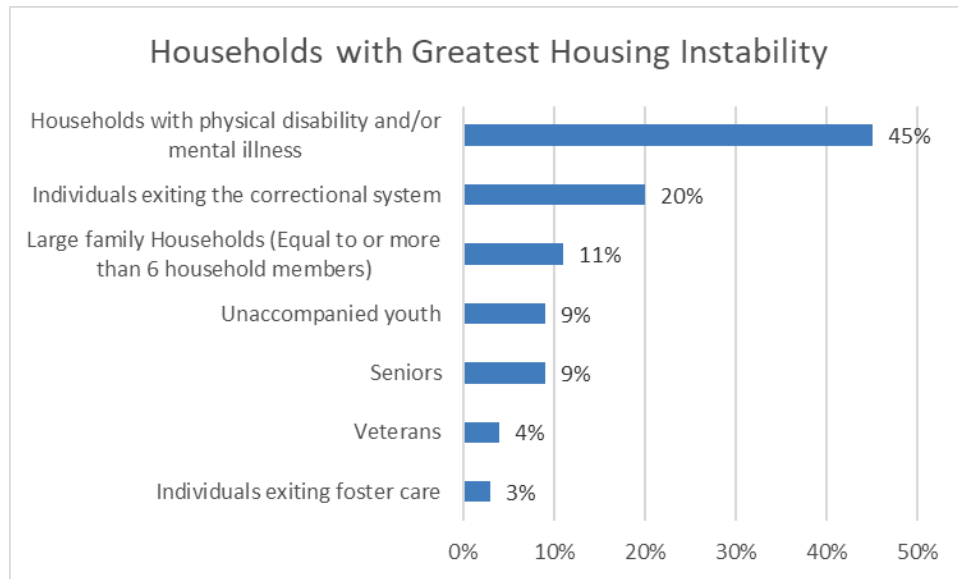
For individuals at risk of experiencing homelessness, respondents reported the top need was also affordable rental housing. However, it was noted that the need for rental assistance was significantly greater for this population when compared to individuals experiencing homelessness or those fleeing or attempting to flee domestic violence/human trafficking. 10% of respondents identified rental assistance as a top need for individuals experiencing homelessness, and 6% for those fleeing or attempting to flee domestic violence/human trafficking. The third highest unmet need for individuals at risk of experiencing homelessness was ongoing supportive services.

The survey results indicated that the needs of respondents fleeing or attempting to flee domestic violence, dating violence, sexual assault, and/or human trafficking, differed significantly from the other two populations. Access to immediate emergency shelter was identified as the top need by 45% of respondents for this population, followed by affordable rental housing, which is a markedly different

trend from the other two populations where access to emergency shelter was only identified as a top need by 4% and 19% of respondents, respectively.

### Subpopulation Needs

In addition to the unmet services and housing needs, survey respondents were asked to identify subpopulations that face the greatest risk of housing instability from a predetermined list. The population identified as facing the greatest housing instability is households with physical disabilities and/or mental illness.



### Racial and Ethnic Disparities

Additionally, survey respondents were asked to identify racial and ethnic disparities in service delivery. Lack of affordable housing development in neighborhoods with accessible amenities was the top need to be addressed in the community with over 46% of respondents selecting this option. There was a noted issue of lack of supportive services for both non-white populations and households who are non-English speaking.

Survey respondents added feedback for a range of issues related to affordable housing and access to housing for marginalized populations. One common issue identified is discrimination in the housing market, including difficulties in access and approval of households on fixed budgets or low incomes, discrimination against those with criminal records, and discrimination against populations who identify as Black, Indigenous or a Person of Color by property management. Other issues include limited oversight of landlords, which can lead to poor property conditions, and historic and on-going disparities in income between white and non-white populations.

Other challenges identified include the lack of affordable housing overall, which disproportionately affects non-white populations, and the need for more affordable housing with larger numbers of bedrooms. Respondents also highlighted the importance of providing supportive services for non-white populations, veterans, and those who have experienced violence, as well as increasing opportunities for smaller Naturally Occurring Affordable Housing (NOAH) units and supporting home ownership models.

Frustrations were also expressed that the issues facing white populations were not being sufficiently addressed.

### Barriers to Accessing and Developing Affordable Housing

The largest barrier identified for accessing affordable housing is the lack of housing stock and inventory (52%). In addition, the ability to develop more affordable housing is difficult to navigate with the high development costs (29%), high cost or low availability of land (19%), and community opposition to new projects in their area (18%).

Choices	Responses
Other:	18 (9.8%)
Lack of accessible amenities in areas (transportation, grocery stores, etc.)	21 (11.4%)
Community Opposition (“NIMBYism”)	33 (17.9%)
Development Costs (I.e., labor shortage, materials costs, etc.)	53 (28.8%)
Lack of Developers / Developer Capacity	12 (6.5%)
Lack of gap financing	28 (15.2%)
Cost or availability of land	34 (18.5%)
Local government approval process	33 (17.9%)
Lack of housing stock or inventory	95 (51.6%)
Zoning or land use requirements	4 (2.2%)

### Prioritization of HOME ARP Eligible Uses

Based on the eligible uses that can be funded in the HOME ARP notice, survey respondents were asked to indicate which two activities Minnesota Housing should prioritize funding. Affordable rental housing was selected as one of the two most important activities in 132 (71%) responses for Minnesota Housing to fund. The second most selected activity was Tenant Based Rental Assistance with 61 (33%) responses, followed by Supportive Services (55 responses, 29%), non-congregate shelter (44 responses, 24%) and non-profit capacity and operating assistance (37 responses, 20%).

### Potential Preferences

Survey respondents were asked to identify qualifying populations who would benefit from being prioritized for HOME ARP funded projects. Respondents were able to select up to two qualifying populations. 45% of responses supported a preference for those experiencing homelessness, 38% for those at risk of homelessness, 30% for other populations who face housing instability and 21% for those fleeing or attempting to flee domestic violence/human trafficking. The survey results further supported the needs assessment and gaps analysis as well as the rankings of the consultations with support for a homeless QP preference.



## Public Participation

Minnesota Housing held one public hearing to gather public input on eligible uses of the HOME ARP funds and held a public comment period for feedback on the draft Allocation Plan.

<b>Dates of Public Notices</b>	January 24, 2023 March 1, 2023
<b>Public Comment Period 1</b>	March 1-16, 2023
<b>Public Comment Period 2</b>	May 25-June 9, 2023
<b>Date of public hearing</b>	February 1, 2023, 4:00-5:30 p.m.

## Public Hearing

Minnesota Housing held a public hearing to solicit feedback on the local use of HOME ARP funds on Wednesday, February 1, 2023. Notice of the public hearing and a survey were sent using Minnesota Housing's eNews participants distribution list on January 24, 2023, and again on January 31, 2023. The Public Hearing Notice included Minnesota Housing contact information (email and phone) to help ensure persons with disability(ies) or Limited English Proficiency who wished to participate could request needed accommodations. The meeting was held virtually with 74 participants representing over 50 organizations. (Organizations present can be found in the Appendix). Participants joined online or by phone.

At the public hearing, information about the HOME ARP program was presented, including an overview of the qualifying populations and the range of activities that could be funded. Participants were asked for their comments on the needs of the qualifying populations and the gaps in housing and services in their region. Questions raised during the Public Hearing were primarily focused on when the funds would become available, how funds would be allocated, what priorities or preferences will be made, the timeline and details about HOME ARP allowable activities, and the local process for allocation funding. A sign language translator attended the public hearing meeting signing for the hearing impaired. The hearing was recorded and posted to the webpage.

## Public Comment Period

In accordance with Section V.B of the HOME ARP Notice, Participating Jurisdictions (PJs) must provide for and encourage citizen participation in the development of the HOME ARP allocation plan. HUD defines Participating Jurisdictions as any State or local government that has been designated by HUD to administer a HOME program grant. Minnesota has 7 PJs: State of Minnesota, through Minnesota Housing, the cities of Minneapolis, St. Paul and Duluth, and the counties of Hennepin, Dakota and St. Louis. The public comment period was held from March 1, 2023 through March 16, 2023. Three comments were received.

## Public Comment Summary

Round One: During the first public comment period, three comments were received. These comments collectively recognized the need for long-term affordable housing. In the implementation phase, Minnesota Housing will look to further define what "affordable" housing means as one comment highlighted a clarification need. Commenters also raised the need for emergency shelter construction, rehabilitation, and operation. Another comment raised awareness regarding data specific to those

experiencing sexual assault and need of long-term housing. Relevant data from this comment was incorporated in the Gaps Analysis section. Additionally, the funding need for Coordinated Entry priority list management was a theme in consultations but was missing in the draft Plan as noted by another comment. Minnesota Housing added language to highlight this need to the Consultation section of this Plan. Finally, a suggested preference for those experiencing sexual assault was named. Minnesota Housing recognizes the needs of all the qualifying populations and the significant increase in risk for those experiencing homelessness then experiencing sexual assault. Minnesota Housing remains hopeful that the QP1 preference may help to serve those who are also facing this trauma.

Round Two: For the second public comment period, three additional comments were received. Two comments received brought forward perspective from housing staff currently supporting households in maintaining housing stability. One reiterated the need for deeply affordable housing for the qualifying households and noted the significant barriers posed by current admissions policies as well as the need for improved maintenance of subsidized buildings. The second called for livable wages for those supporting households in housing. The third comment offered additional consultation feedback and edits which have been incorporated in the consultation section and appendix accordingly.

### **Comments Accepted**

Minnesota Housing accepted all six comments captured through public participation efforts which helped inform the Minnesota HOME ARP Allocation Plan and proposed activities.

### **Comments Not Accepted**

The six comments received were accepted. There were no comments not accepted.

### **Efforts to Broaden Public Participation**

The notice regarding the availability of the draft allocation plan, the public comment period, and the public hearing to all interested community organizations and partners for the HOME ARP funding was sent via Minnesota Housing's eNews list which encompasses over 950 municipalities, counties, and Tribal nations. These units of local government, which may be eligible to apply for HOME ARP are also aware of the needs of the qualifying populations in their community. Minnesota Housing's eNews list also utilizes and targets Community Action Agencies, Housing and Redevelopment Authorities, and other non-profits that serve individuals and families who are homeless or living in poverty. Additionally, Minnesota Housing translated the feedback survey into Spanish, Hmong, and Somali to broaden access for participation in the HOME ARP consultation process. Minnesota Housing elected to hold a public hearing virtually outside of business hours to maximize access across the State and accommodate different working schedules.

### **Needs Assessment and Gaps Analysis**

In addition to data gathered through consultations, the following data sources were used or consulted to determine the size and demographic composition of qualifying populations in Minnesota, their needs, and gaps within the current shelter, housing inventory, and service delivery system:

- **Housing Inventory Count (HIC)**, 2022 reports for all Minnesota Continuums of Care (CoCs)
- **Point in Time (PIT) Count**, 2022 reports for all Minnesota CoCs

- **Minnesota Core Homeless Programs Report (MN CHPR)**, FY2021 summary data for all Minnesota CoCs also disaggregated for CoCs in Twin Cities Metro Minnesota and Greater Minnesota
- **American Community Survey (ACS)**, 2020 5-Year Estimates Data Profiles, Table DP05 Demographics and Housing Estimates, S1071 Poverty Status in the Past 12 months
- **Comprehensive Housing Affordability Strategy (CHAS)**, 2015-2019 for Minnesota
- **Department of the Treasury, Emergency Rental Assistance Program (ERA1) Interim Report (RentHelpMN)**, January 1 – June 30, 2022
- **211 Housing Data 2022, Greater Twin Cities United Way**, January 2023
- **Coordinated Entry Monitoring Report, FY2021** summary data for all Minnesota CoCs also disaggregated for CoCs in Twin Cities Metro Minnesota and Greater Minnesota
- **State of the State’s Housing 2021**, Minnesota Housing Partnership
- **2021 Program Assessment Report**, Minnesota Housing
- **2022-23 Affordable Housing Plan**, Minnesota Housing
- **Minnesota Housing Measures 2021**, HousingLink
- **2021 Housing Counts Report**, HousingLink
- **Housing Needs by State—Minnesota**, National Low Income Housing Coalition
- **16th Annual Domestic Violence Counts Report for Minnesota**, National Network to End Domestic Violence
- **2021 Annual Report**, Cornerstone Minnesota
- **An Evaluation of the Safe Harbor Initiative in Minnesota – Phase 4**, Minnesota Department of Health, April 1, 2019 – June 30, 2021
- **Office of Victims of Crime Report**, Breaking Free, 1/1/2018-12/31/2021
- **National Human Trafficking Hotline, data for Minnesota**, 2021

## Data Limitations

When American Community Survey data were utilized, 5-year estimates have been used. According to the [US Census Bureau](#), “the 5-year estimates from the ACS are “period” estimates that represent data collected over a period of time. The primary advantage of using multiyear estimates is the increased statistical reliability of the data for less populated areas and small population subgroups.”

Comparatively, other data sources used in this needs assessment/gaps analysis are for one-year, different years, and across different geographies. Though the parameters are not consistent across data sources, data collected from different sources for different time periods provided a useful framework for understanding the size of qualifying populations (QPs).

## Definitions of the Qualifying Populations

### Qualifying Population 1 (QP1): Homeless

For the purposes of the allocation plan, all references to “homeless”, “homeless individuals”, “households experiencing homelessness”, “QP1” means “Homeless”, as defined in [24 CFR 91.5](#) Homeless (1), (2), or (3) adopted in the [HOME-ARP Implementation Notice](#) (Pg. 3-4):

“(1) An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

(i) An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;

(ii) An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); or

(iii) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;

(2) An individual or family who will imminently lose their primary nighttime residence, provided that: (i) The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance; (ii) No subsequent residence has been identified; and (iii) The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks needed to obtain other permanent housing;

(3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:

(i) Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)), or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);

(ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;

(iii) Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and

(iv) Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment.”

## Qualifying Population 2 (QP2): At-Risk of Homelessness

For the purposes of the allocation plan, all references to “individuals at-risk of homelessness”, “households at -risk of homelessness”, “QP2” means “Homeless”, as defined in [24 CFR 91.5 At risk of homelessness](#) adopted in the [HOME-ARP Implementation Notice](#) (Pg. 4-5)

“(1) An individual or family who:

- (i) Has an annual income below 30 percent of median family income for the area, as determined by HUD;
- (ii) Does not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the “Homeless” definition in this section; and
- (iii) Meets one of the following conditions:
  - a. Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
  - b. Is living in the home of another because of economic hardship;
  - c. Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
  - d. Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by federal, State, or local government programs for low-income individuals;
  - e. Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 people per room, as defined by the U.S. Census Bureau;
  - f. Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or
  - g. Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan;

(2) A child or youth who does not qualify as “homeless” under this section, but qualifies as “homeless” under section 387(3) of the Runaway and Homeless Youth Act (42 U.S.C. 5732a(3)), section 637(11) of the Head Start Act (42 U.S.C. 9832(11)), section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6)), section 330(h)(5)(A) of the Public Health Service Act (42 U.S.C. 254b(h)(5)(A)), section 3(l) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(l)), or section 17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(15)); or

(3) A child or youth who does not qualify as “homeless” under this section but qualifies as “homeless” under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)), and the parent(s) or guardian(s) of that child or youth if living with her or him.”

### Qualifying Population 3 (QP3): Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking

For the purposes of the allocation plan all references to qualifying population 3 or QP3 refer to the definition in the [HOME-ARP Implementation Notice](#) (Pg. 6-7) and as follows:

“For HOME-ARP, this population includes any individual or family who is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking. This population includes cases where an individual or family reasonably believes that there is a threat of imminent harm from further violence due to dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual’s or family’s primary nighttime residence or has made the individual or family afraid to return or remain within the same dwelling unit. In the case of sexual assault, this also includes cases where an individual reasonably believes there is a threat of imminent harm from further violence if the individual remains within the same dwelling unit that the individual is currently occupying, or the sexual assault occurred on the premises during the 90-day period preceding the date of the request for transfer.

**Domestic violence**, which is defined in [24 CFR 5.2003](#) includes felony or misdemeanor crimes of violence committed by:

- 1) A current or former spouse or intimate partner of the victim (the term “spouse or intimate partner of the victim” includes a person who is or has been in a social relationship of a romantic or intimate nature with the victim, as determined by the length of the relationship, the type of the relationship, and the frequency of interaction between the persons involved in the relationship);
- 2) A person with whom the victim shares a child in common;
- 3) A person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner;
- 4) A person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving HOME-ARP funds; or 5) Any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction.

**Dating violence** which is defined in [24 CFR 5.2003](#) means violence committed by a person:

- 1) Who is or has been in a social relationship of a romantic or intimate nature with the victim; and
- 2) Where the existence of such a relationship shall be determined based on a consideration of the following factors:
  - a. The length of the relationship;
  - b. The type of relationship; and
  - c. The frequency of interaction between the persons involved in the relationship.

**Sexual assault** which is defined in [24 CFR 5.2003](#) means any nonconsensual sexual act proscribed by Federal, Tribal, or State law, including when the victim lacks capacity to consent.

**Stalking** which is defined in [24 CFR 5.2003](#) means engaging in a course of conduct directed at a specific person that would cause a reasonable person to:

- 1) Fear for the person's individual safety or the safety of others; or
- 2) Suffer substantial emotional distress.

**Human Trafficking** includes both sex and labor trafficking, as outlined in the Trafficking Victims Protection Act of 2000 (TVPA), as amended ([22 U.S.C. 7102](#)). These are defined as:

- 1) *Sex trafficking* means the recruitment, harboring, transportation, provision, obtaining, patronizing, or soliciting of a person for the purpose of a commercial sex act, in which the commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age; or
- 2) *Labor trafficking* means the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery."

#### **Qualifying Population 4 (QP4): Other Populations**

For the purposes of the allocation plan all references to qualifying population 4 or QP4 refer to the definition in the [HOME-ARP Implementation Notice](#) (pg. 7-8) and as follows:

"Other Populations where providing supportive services or assistance under section 212(a) of NAHA (42 U.S.C. 12742(a)) would prevent the family's homelessness or would serve those with the greatest risk of housing instability. HUD defines these populations as individuals and households who do not qualify under any of the populations above but meet one of the following criteria:

(1) **Other Families Requiring Services or Housing Assistance to Prevent Homelessness** is defined as households (i.e., individuals and families) who have previously been qualified as "homeless" as defined in 24 CFR 91.5, are currently housed due to temporary or emergency assistance, including financial assistance, services, temporary rental assistance or some type of other assistance to allow the household to be housed, and who need additional housing assistance or supportive services to avoid a return to homelessness.

(2) **At Greatest Risk of Housing Instability** is defined as household who meets either paragraph (i) or (ii) below:

(i) has annual income that is less than or equal to 30% of the area median income, as determined by HUD and is experiencing severe cost burden (i.e., is paying more than 50% of monthly household income toward housing costs);

(ii) has annual income that is less than or equal to 50% of the area median income, as determined by HUD, AND meets one of the following conditions from paragraph

(iii) of the "At risk of homelessness" definition established at 24 CFR 91.5:

- (A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
- (B) Is living in the home of another because of economic hardship;
- (C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
- (D) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by Federal, State, or local government programs for low-income individuals;
- (E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 persons reside per room, as defined by the U.S. Census Bureau;
- (F) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or
- (G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan."

## **QP1: Homelessness**

### **Data Utilized: Homelessness**

Data from the most recently submitted Point in Time (PIT) Count (2022), Housing Inventory Count (HIC) (2022) and Minnesota Core Homeless Programs Report (CHPR) (10/1/2021 – 09/30/2022) reports were utilized to determine the size and demographics of the population experiencing homelessness according to the [McKinney Vento definition](#). The [HOME ARP definition of homelessness](#) includes only paragraphs (a)(1)-(3) of the McKinney Vento definition and for the purposes of this plan we adopt the HOME ARP definition as outlined in the [Definitions of the Qualifying Populations](#) section of this plan. Despite the definition differences, these sources provide the most accurate data available to evaluate the size and demographic composition of the HOME ARP homeless QP.

### **Size and Demographic Composition: Homelessness**

#### **Size of Population**

Two main sources provide data on the total number of people experiencing homelessness in Minnesota: the PIT Count and the CHPR report. Taken together, they provide a picture of the daily and annual number of people in this population.



Size: Point in Time (PIT) Count

The PIT Count provides a snapshot of homelessness in a community. It represents the number of people identified as experiencing homelessness on a single night in January. CoCs across Minnesota conducted the Point in Time Count on January 26, 2022. **The combined 2022 PIT Counts across all ten CoCs in Minnesota identified 7,917 people experiencing homelessness on the night of the counts**, including:

- 6,148 persons sleeping in a sheltered location (56% in emergency shelter and 22% in transitional housing).
- 1,769 persons unsheltered; sleeping in a place not meant for human habitation.
- People in adult-only households made up 62% of the PIT count, followed by persons in households with adults and children (37%) and persons in child-only households (1%).

2022 Point in Time Count Minnesota Summary of Persons			
	Persons in household with adults and children	Persons in adult only households	Persons in child-only households
Emergency Shelter	1,644	2,767	32
Transitional Housing	1,032	639	34
Unsheltered	284	1,474	11
<b>Total</b>	<b>2,960</b>	<b>4,880</b>	<b>77</b>

The PIT Count was further disaggregated into two regional levels of Twin Cities Metro Minnesota (Twin Cities Metro MN) and Greater Minnesota (Greater MN). Twin Cities Metro includes the urbanized CoCs of MN-500, MN-501, and MN-503 and the Greater MN region consists of the less urbanized regions of MN-502, MN-504, MN-505, MN-506, MN-508, MN-509, and MN-511.

- Twin Cities Metro identified 5,137 people (65% of state total) as experiencing homelessness on the night of the PIT.
- Greater Minnesota identified 2,780 people experiencing homelessness on the night of the PIT. (35% of the state total).

2022 Point in Time Count for Twin Cities Metro Minnesota (aggregate for MN-500, MN-501, MN-503), Summary of Persons			
	Persons in household with adults and children	Persons in adult only households	Persons in child-only households
Emergency Shelter	1,138	2,018	10
Transitional Housing	526	452	26
Unsheltered	42	925	0
<b>Total</b>	<b>1,706</b>	<b>3,395</b>	<b>36</b>

2022 Point in Time Count for Greater Minnesota (aggregate for MN-502, MN-504, MN-505, MN-506, MN-508, MN-509, MN-511), Summary of Persons			
	Persons in household with adults and children	Persons in adult only households	Persons in child-only households
Emergency Shelter	506	749	22
Transitional Housing	506	187	8
Unsheltered	242	549	11
<b>Total</b>	<b>1,254</b>	<b>1,485</b>	<b>41</b>

Size: Minnesota Core Homeless Programs Report (MN CHPR)

The MN CHPR is a system-wide report that draws upon annualized data about homelessness available in each community's Homeless Management Information System (HMIS). The MN CHPR was developed to report demographic characteristics, family types, subpopulations, and outcomes. This report is used by CoCs to understand programs' characteristics and assist with program evaluation and monitoring.

The MN CHPR defines homelessness as all individuals in HMIS-participating projects who were contacted during street outreach or spent at least one day in emergency shelter or transitional housing. The MN CHPR is limited to providers who enter data into HMIS and therefore may undercount the number of people experiencing sheltered and unsheltered homelessness in the state. The aggregate number of households experiencing homelessness (served in street outreach, emergency shelter, transitional housing) captured in the MN CHPR statewide was 26,872 in FY2021 (October 1, 2021-September 30, 2022), as shown in the table below.

2021-2022 MN CHPR Persons Experiencing Homelessness				
	Total persons	Persons in households with adults and children	Persons in adult-only households	Persons in child-only households
Sheltered (emergency and transitional)	20,952	6,370	14,048	534
Unsheltered (street outreach)	5,920	635	5,043	242
Total (unduplicated)	<b>26,872</b>	<b>7,005</b>	<b>19,091</b>	<b>776</b>

Further aggregation of the MN CHPR is needed to understand the annual extent of homelessness in each region. The tables below show the aggregate number of persons by household type served in the Twin Cities Metro and Greater Minnesota Regions.

- 66% of persons experiencing homelessness received services in the Twin Cities Metro CoCs
- 34% of people experiencing homelessness received services from the Greater MN CoCs.

<b>2021-2022 MN CHPR Persons Experiencing Homelessness for Twin Cities Metro Minnesota</b>				
	<b>Total persons</b>	<b>Persons in households with adults and children</b>	<b>Persons in adult-only households</b>	<b>Persons in child-only households</b>
<b>Sheltered (emergency and transitional)</b>	13,613	3,473	9,838	302
<b>Unsheltered (street outreach)</b>	4,396	312	3,980	104
<b>Total (unduplicated)</b>	<b>18,009</b>	<b>3785</b>	<b>13,818</b>	<b>406</b>
<b>2021-2022 MN CHPR Persons Experiencing Homelessness for Greater Minnesota</b>				
	<b>Total persons</b>	<b>Persons in households with adults and children</b>	<b>Persons in adult-only households</b>	<b>Persons in child-only households</b>
<b>Sheltered (emergency and transitional)</b>	7,687	2,944	4,509	234
<b>Unsheltered (street outreach)</b>	1,534	323	1,073	138
<b>Total (unduplicated)</b>	<b>9,221</b>	<b>3267</b>	<b>5582</b>	<b>372</b>

The percent of persons served in each region differ significantly:

- People in households with adults and children make up 21% of the total persons experiencing homelessness in the Twin Cities Metro CoCs and 35% of the total persons experiencing homelessness in Greater MN's CoCs.
- Adult-only households make up 77% of the total persons experiencing homelessness in the Twin Cities Metro CoCs and 61% of the total persons experiencing homelessness in Greater MN's CoCs.
- Child only households make up 2% of the total persons experiencing homelessness in the Twin Cities Metro CoCs and 4% of the total persons experiencing homelessness in Greater MN's CoCs.

2021-2022 MN CHPR Persons Experiencing Homelessness by Region		
	Twin Cities Metro	Greater MN
Persons in households with adults and children	3,785 (21%)	3,367 (35%)
Persons in adult only households	13,818 (77%)	5,582 (61%)
Persons in child only households	406 (2%)	372 (4%)
<b>Total</b>	<b>18,009 (100%)</b>	<b>9,221 (100%)</b>

### Household Composition

PIT and MN CHPR data indicate that most people in Minnesota experiencing homelessness are in adult-only households. Of the 5,425 total households identified as experiencing homelessness in the PIT count, 83% were adult-only households living in emergency shelters, transitional housing, and unsheltered living situations. Households with adults and children made up 17% and child-only households made up 1% of total households experiencing homelessness on a given night.

2022 Point in Time Count Minnesota Households				
	Total households	Households with adults and children	Adult-only households	Child-only households
Emergency Shelter	3,208	472	2,709	27
Transitional Housing	978	332	622	24
Unsheltered	1,239	83	1,145	11
<b>Total Households</b>	<b>5,425</b>	<b>887 (17%)</b>	<b>4,476 (83%)</b>	<b>62 (1%)</b>

Annualized data from the MN CHPR shows a slight difference in the percentage of households, with increased percentages for adult-only and child-only households over the year compared to PIT. Of the 21,608 households experiencing literal homelessness (unsheltered, living in emergency shelter, living in a place not meant for human habitation) served through the year, 87% were adult-only households and 3% were child only households, an increase from the point in time viewpoints. Households with adults and children comprised 10% of the annual number of those experiencing homelessness.

2021-2022 MN CHPR Households				
	Total households	Households with adults and children	Adult-only households	Child-only households
Sheltered (emergency and transitional)	16,182	1,922	13,768	492
Unsheltered (street outreach)	5,426	203	5,005	218
<b>Total (unduplicated)</b>	<b>21,608</b>	<b>2,125 (10%)</b>	<b>18,773 (87%)</b>	<b>710 (3%)</b>

### Subpopulations

On the night of the PIT Count, 1,781 persons self-identified as having a severe mental illness and 976 persons self-identified chronic substance abuse. Veterans accounted for 290 people experiencing homelessness, 11% of whom were sleeping in unsheltered locations on the night of the PIT count. There were 772 persons who identified as survivors of domestic violence (DV), with 9% of them sleeping in unsheltered locations on the night of the PIT count.

2022 Point in Time Count Subpopulations Minnesota			
	Sheltered	Unsheltered	Total
Severe Mental Illness	1,286	495	<b>1,781</b>
Chronic Substance Abuse	650	326	<b>976</b>
Veterans	257	33	<b>290</b>
Survivors of Domestic Violence	706	66	<b>772</b>

## Race

Nearly 38% of people experiencing homelessness on the night of the PIT count were White (2,979 individuals). Thirty seven percent were Black or African American (2,925). Fourteen percent were American Indian or Alaska Native (1097). Smaller percentages of persons were multiple races (9%), Asian (2%). Native Hawaiian or Pacific Islander (<1%).

2022 Point in Time Count, Race Minnesota				
	Sheltered	Unsheltered	Total	Percentage
American Indian or Alaska Native	633	464	1,097	14%
Asian				
Black or African American	2,483	442	2,925	37%
Native Hawaiian or Pacific Islander				
White	2,231	748	2,979	38%
Multiple races				
<b>Total</b>	<b>6,148</b>	<b>1,769</b>	<b>7,917</b>	<b>100%</b>

2021-2022 MN CHPR, Race Minnesota				
	Sheltered	Unsheltered	Total	Percentage
American Indian or Alaska Native	2,506	1,237	3744	13%
Asian	365	139	504	2%
Black or African American	7,645	2,138	9,783	35%
Native Hawaiian or Pacific Islander	104	24	128	<1%
White	8,640	2,639	11,279	40%
Multiple races	1,879	639	2,518	9%
<b>Total</b>	<b>21,139</b>	<b>6,816</b>	<b>27,956</b>	<b>100%</b>

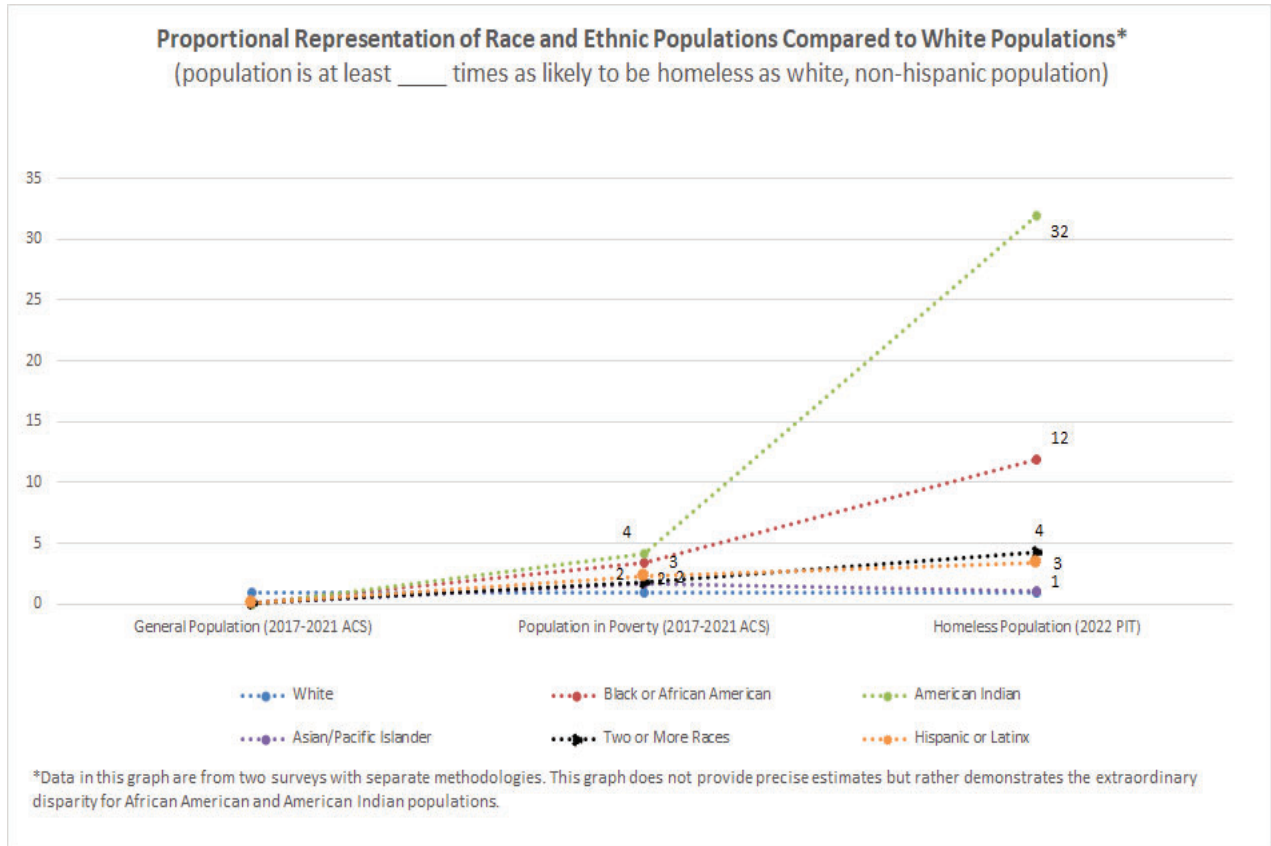
*Missing or refused race date from MN CHPR was extrapolated to align with the HUD PIT requirements for missing demographic data.*

To understand the meaning of the PIT data to racial demographics, it is necessary to place it in the context of Minnesota's general population, and the demographics of the population in poverty. Compared to their share of the general population, both Black and American Indian or Alaskan Native residents are disproportionately represented in the homeless system. According to American Community Survey (ACS), the general population of the people in Minnesota is 81% white, 7% Black, and 1% Native American or Alaskan Native. The graph below shows that Black and Native American or Alaskan Native residents experience homelessness at a greater rate than white residents, as compared to their share of the general population:

- American Indian residents in Minnesota are at least 4 times as likely to be living in poverty and 32 times as likely to be homeless as the white, non-Hispanic population.

- Black or African American residents in Minnesota are at least 3 times as likely to be living in poverty and 12 times as likely to be homeless as white, non-Hispanic population.

These disproportionate rates of homelessness as compared to the total population for Black and Native America or Alaskan residents are found nationwide and in nearly every CoC across the country.



% Demographics of General Population compared to Point in Time of those Experiencing Homelessness				
	State Population	Point in Time	Twin Cities Metro PIT	Greater MN PIT
American Indian or Alaska Native	1%	14%	8%	25%
Asian	5%	2%	3%	1%
Black or African American	7%	37%	49%	15%
Native Hawaiian or Pacific Islander	<1%	<1%	<1%	<1%
White	81%	38%	31%	50%
Multiple races	5%	9%	10%	8%

\*The experience of homelessness should reflect the demographic breakdown of the State population, what the table shows is an overrepresentation of Black, Indigenous and Multi-racial residents experiencing homelessness.

## Unmet Housing and Service Needs: Homelessness

The following is a summary of the Housing Inventory Count (HIC) combined across Minnesota's CoCs:

2022 HIC for all MN CoCs combined								Subset of Total Bed Inventory	
	Family units	Family beds	Adult only beds	Child only beds	Year-round beds (total)	Seasonal beds	Overflow / Voucher beds	Veteran beds*	Youth beds*
<b>Emergency Shelter/Transitional Housing</b>									
<b>Emergency Shelter</b>	803	2,438	3,058	76	5,572	290	281	55	316
<b>Transitional Housing</b>	480	1,446	833	28	2,307	0	0	141	520
<b>Total Temporary Beds</b>	<b>1,283</b>	<b>3,884</b>	<b>3,891</b>	<b>104</b>	<b>7,879</b>	<b>290</b>	<b>281</b>	<b>196</b>	<b>836</b>
<b>Permanent Housing</b>									
<b>Permanent Supportive Housing</b>	1,357	4,231	7,031	0	11,262	0	0	1,166	402
<b>Rapid Re-Housing</b>	580	1,914	559	3	2,476	0	0	98	269
<b>Other Permanent Housing</b>	1,262	3,912	3,327	10	7,249	0	0	79	272
<b>Total Permanent Beds</b>	<b>3,208</b>	<b>10,057</b>	<b>10,917</b>	<b>13</b>	<b>20,987</b>	<b>0</b>	<b>0</b>	<b>1,343</b>	<b>943</b>
<b>Total:</b>	<b>4,491</b>	<b>13,941</b>	<b>14,808</b>	<b>117</b>	<b>28,866</b>	<b>290</b>	<b>281</b>	<b>1,539</b>	<b>1,779</b>

\*Veterans and youth are a subset of the total count of people experiencing homelessness on the night of the PIT Count.



The following is a summary of the Housing Inventory Count (HIC) combined across Twin Cities Metro Minnesota's CoCs:

2022 HIC for all Twin Cities Metro Minnesota (MN-500, MN-501, MN-503)								Subset of Total Bed Inventory	
	Family units	Family beds	Adult only beds	Child only beds	Year- round beds (total)	Seasona l beds	Overflow / Voucher beds	Veteran beds*	Youth beds*
<b>Emergency Shelter/Transitional Housing</b>									
<b>Emergency Shelter</b>	456	1,509	2,253	33	3,795	88	211	43	204
<b>Transitional Housing</b>	242	768	577	20	1,365	0	0	115	230
<b>Total Temporary Beds</b>	<b>698</b>	<b>2,277</b>	<b>2,830</b>	<b>53</b>	<b>5,160</b>	<b>88</b>	<b>211</b>	<b>158</b>	<b>434</b>
<b>Permanent Housing</b>									
<b>Permanent Supportive Housing</b>	980	3,174	5,792	0	8,966	0	0	978	316
<b>Rapid Re- Housing</b>	379	1,314	341	0	1,655	0	0	74	208
<b>Other Permanent Housing</b>	647	2,264	2,243	0	4,507	0	0	34	211
<b>Total Permanent Beds</b>	<b>2,006</b>	<b>6,752</b>	<b>8,376</b>	<b>0</b>	<b>15,128</b>	<b>0</b>	<b>0</b>	<b>1,086</b>	<b>735</b>
<b>Grand Total:</b>	<b>2,704</b>	<b>9,029</b>	<b>11,206</b>	<b>53</b>	<b>20,288</b>	<b>88</b>	<b>211</b>	<b>1,244</b>	<b>1,169</b>

\*Veterans and youth are a subset of the total count of people experiencing homelessness on the night of the PIT Count.

The following is a summary of the Housing Inventory Count (HIC) combined across Greater Minnesota's CoCs:

2022 HIC for all Greater Minnesota (MN-502, MN-504, MN-505, MN-505, MN-606, MN-508, MN-509, MN-511)								Subset of Total Bed Inventory	
	Family units	Family beds	Adult only beds	Child only beds	Year-round beds (total)	Seasonal beds	Overflow / Voucher beds	Veteran beds*	Youth beds*
<b>Emergency Shelter/Transitional Housing</b>									
<b>Emergency Shelter</b>	347	929	805	43	1,777	202	70	12	112
<b>Transitional Housing</b>	238	678	256	8	942	0	0	26	290
<b>Total Temporary Beds</b>	<b>585</b>	<b>1,607</b>	<b>1,061</b>	<b>51</b>	<b>2,719</b>	<b>202</b>	<b>70</b>	<b>38</b>	<b>402</b>
<b>Permanent Housing</b>									
<b>Permanent Supportive Housing</b>	377	1,057	1,239	0	2,296	0	0	188	86
<b>Rapid Re-Housing</b>	201	600	218	3	821	0	0	24	61
<b>Other Permanent Housing</b>	615	1,648	1,084	10	2,742	0	0	45	61
<b>Total Permanent Beds</b>	<b>1,193</b>	<b>3,305</b>	<b>2,541</b>	<b>13</b>	<b>5,859</b>	<b>0</b>	<b>0</b>	<b>257</b>	<b>208</b>
<b>Grand Total:</b>	<b>1,778</b>	<b>4,912</b>	<b>3,602</b>	<b>64</b>	<b>8,578</b>	<b>202</b>	<b>70</b>	<b>295</b>	<b>610</b>

\*Veterans and youth are a subset of the total count of people experiencing homelessness on the night of the PIT Count.

Per the 2022 PIT Count, the number of people experiencing sheltered and unsheltered homelessness in Minnesota is 7,917 people while the current inventory of year rounds temporary beds is 7,879. Statewide, there was an unmet need of 1,183 shelter beds for persons in adult only households. Twin Cities Metro has an unmet need of 690 shelter beds for persons in adult only households and Greater MN had an unmet need of 431 beds for persons in adult only households.

### Gaps Analysis: Homelessness

The homeless response system provides both crisis response (emergency shelter and transitional housing) and housing interventions. Therefore, the gaps analysis in this report considers the current availability of project beds on the night of the PIT for persons experiencing homelessness, equity in the types of interventions offered to different groups experiencing homelessness, and the efficacy of the homeless response system in assisting those groups in resolving their homeless crises. Additionally, it should be noted that in January 2022, Minnesota experienced a COVID-19 surge. Some communities

had specific funding for isolation beds for people experiencing homelessness who tested positive for COVID-19. These beds were accounted in the HIC as seasonal beds and not an ongoing emergency bed resource.

PIT and MN CHPR data shows that Minnesota has a high number of sheltered and unsheltered adult only households experiencing homelessness. The state has an insufficient capacity for emergency shelter beds for adult-only households to meet the needs of those experiencing homelessness. Increasing shelter beds is unlikely to have a significant impact on reducing unsheltered homelessness, as shelter is not a housing solution and all persons experiencing unsheltered homelessness are not able to utilize it. Increasing shelter is not a long-term solution for safe and secure housing. Therefore, a combination of additional shelter beds and permanent housing is likely to have more impact in reducing homelessness.

Data from Minnesota’s State HIC and PIT were consolidated to perform a statewide analysis of gaps in the homeless crisis response system. The table below compares current emergency shelter inventory, the number of families/individuals experiencing sheltered and unsheltered homelessness, and the gap in available inventory. This table shows both the total available inventory (total inventory minus occupied inventory) and the gap in inventory (available inventory minus the number of unsheltered families/individuals). Because inventory categorized as seasonal or overflow is not identified by household type on the HIC, it is not included in the tables below.

Minnesota Shelter Gaps Analysis					
	Current Inventory (HIC)	Sheltered homelessness (PIT)	Unsheltered homelessness (PIT)	Available inventory	Gap in Inventory
Persons in adult-only households	3,058	2767	1474	291	-1,183
Households with adults and children	803	472	83	331	248 (surplus)
Persons in child-only households	76	32	11	44	33 (surplus)

The following two tables show the statewide shelter gaps broken down by regions:

<b>Twin Cities Metro Minnesota CoC Shelter Gaps Analysis MN-500, MN-501, MN-503)</b>					
	Current Inventory (HIC)	Sheltered homelessness (PIT)	Unsheltered homelessness (PIT)	Available Inventory	Gap in Inventory
Persons in households with only adults	2,253	2,108	925	235	-690
Households with adults and children					(surplus)
Persons in child-only households	33	10	0	23	23 (surplus)

<b>Greater Minnesota CoC Shelter Gaps Analysis MN-502, MN-504, MN-505, MN-506, MN-508, MN-509, MN-511)</b>					
	Current Inventory (HIC)	Sheltered homelessness (PIT)	Unsheltered homelessness (PIT)	Available Inventory	Excess Inventory
Persons in households with only adults	805	687	549	118	-431
Households with adults and children	347	156	67	191	124 (surplus)
Persons in child-only households	43	22	11	21	10 (surplus)

In addition to looking at data from those who have accessed the homelessness system, it is useful to examine data for those who have attempted to access the homelessness system via Coordinated Entry (CE) but were unsuccessful. Each of Minnesota’s 10 CoCs utilizes an integrated CE process through the State’s HMIS system. CE is designed to provide a consistent, community-wide intake process that matches people experiencing homelessness to community resources that are the best fit for their situation. Thus, CE is the “front door” to the state’s homelessness system and the mechanism by which households are referred to housing solutions. However, not all those who are assessed via the system are able to gain access to appropriate housing. Between 10/1/21 and 9/30/22, across Minnesota’s CoCs, 17,594 households who were assessed via coordinated entry were prioritized for a housing referral. Of those, nearly 53% (9,262) were offered a housing referral. Among referred clients, only 34% (3,112 of 9,262) of households referred by CE for housing were able to access non-emergency housing because of that referral. Overall, this represents a 17.7% successful referral rate when compared against

the total number of prioritized households accessed via coordinated entry. This results in 14,482 households that were prioritized who were not successfully referred for housing during this period. It should also be noted that not all communities in the state routinely utilize the CE “front door” when seeking housing assistance. As such, the extent of need indicated by analyzing CE data likely undercounts the total amount of unmet need statewide.

<b>Minnesota Coordinated Entry Data and Unmet Housing Need</b>			
	<b>Metro Twin Cities</b>	<b>Greater Minnesota</b>	<b>Statewide</b>
Households prioritized for referral	8,554	9,238	17,594
Total Housing referrals	4,493	4,767	9,262
Successful Housing Referrals	2,003	1,108	3,112
% of referrals that were successful	44.6%	23.2%	33.6%
<b>Unmet need (total prioritized HHs less successful referrals)</b>	<b>6,551</b>	<b>8,130</b>	<b>14,482</b>

### Minnesota Shelter Gaps Summary

- 62% of people experiencing homelessness are from adult-only households.
- A gap of 1,183 shelter beds for persons in adult-only households exists if the gap is based on a 1:1 ratio of unsheltered persons to beds. This is represented by totaling the surplus of 291 additional beds plus 1,474 persons in adult-only households who were homeless on the night of the PIT count.
- Minnesota had a surplus of 248 shelter units for households with adults and children on the night of the PIT count. There were 331 units available on the night of the PIT count; however, there were 83 families in unsheltered locations on the night of the PIT count.
- Minnesota has a surplus of 33 shelter beds for households with only children. There were 44 units available on the night of the PIT count, however there were 11 persons in child-only households in unsheltered locations on the night of the PIT count.
- To note: surplus beds could mean an over-availability of beds in some areas, and lack of availability in other areas of need. Available data sets limited the ability to determine the reasons for surplus.

### Minnesota Coordinated Entry Referral Gaps Summary

- In the Twin Cities Metro region (MN-500, MN-501 and MN 503), 8,554 households were prioritized for housing referrals, of which 4,493 received a referral. Of these housing referrals, 44.6% (2,003) were successful, leaving a gap of 6,551 prioritized households (76.7%) that did not have a successful referral.
- In the Greater Minnesota region (MN-502, MN-504, MN-505, MN-506, MN-508, MN-509 and MN 511), 9,238 households were prioritized for housing referrals, of which 4,767 received a referral. Of these housing referrals, 23.3% (1,108) were successful, leaving a gap of 8,130 prioritized households (88.0%) that did not have a successful referral.

## QP2: At-risk of Homelessness

### Data: At-risk of Homelessness

The HOME ARP program identifies individuals and families at risk of homelessness as the second eligible QP. The program utilizes the McKinney Vento definition for at-risk of homelessness with no changes (see [Definitions of the Qualifying Populations](#) section for full definition).

A valuable source of data regarding housing needs for the at-risk population is provided through Minnesota's 211 system, administered across the state by four providers (Greater Twin Cities United Way, First Call for Help, First Link and Great Rivers 211). For the purposes of this analysis, data was collected from regions covered by Greater Twin Cities United Way (GTCUW) and First Call for Help, which covers over 97% of the state's population for 211 purposes. According to their 2022 annual data, GTCUW/First Call for Help 211 received a total of 162,788 requests for housing related assistance. Of these, the most common referral type was for rental payment assistance, constituting 70.6% of all requests made statewide in 2022. Note that requests made to 211 may include more than one assistance category, so it is possible that an individual requester will appear in more than one category. Additionally, it is noted that Minnesota's 211 system has a remarkably low no referral rate: only 1,862, or 1.1%, of housing assistance requests statewide did not receive a referral for assistance. While this low no referral rate does not ensure that every 211 caller is ultimately assisted, it does suggest that an exceptionally high majority of those requesting assistance are able to reach a program/resource that can potentially resolve their housing issue.

GTCUW /First Call 211 Annual Report 2022			
	Twin Cities Metro	Greater Minnesota	Statewide
<b>Total Housing and Shelter Requests</b>	<b>132,813</b>	<b>29,975</b>	<b>162,788</b>
<b>Housing Expense Assistance/Homelessness Prevention</b>	94,320	35,879	114,862
<b>Utility Assistance/Connection/Repair</b>	13,841	5,044	18,328
<b>Emergency Shelter</b>	11,225	2,563	13,380
<b>Residential Housing Options/Subsidized Housing</b>	9,604	1,205	11,457
<b>Housing Search and Information</b>	1,352	412	1,664
<b>Transitional/Supportive Housing</b>	1,268	307	1,561
<b>Other Housing Requests</b>	1,203	262	1,536

### Size and Demographic Composition: At-risk of Homelessness

Data from the Comprehensive Housing Affordability Strategy (CHAS), 2015-2019 for Minnesota indicates that 137,000 renter households with income at less than 30% of Area Median Income (AMI) have one or more severe housing problems, which the CHAS defines as incomplete kitchen facilities, incomplete plumbing facilities, more than one person per room, or cost burden greater than 30%.

## **Unmet Housing and Service Needs: At-risk of Homelessness**

The total number of rental units in Minnesota is approximately 648,545, as reported in the 2015-2019 CHAS report. Of these, approximately 119,500 units are considered affordable to households with income less than 30% of AMI. However, further analysis in the CHAS report analyzed by Minnesota Housing also shows that there are 176,855 households with income less than 30% AMI in Minnesota of which approximately 74% are living in rental units that are either substandard or are considered “rent-burdened” (meaning that rent is 30% or more of their total income) and of those, 57% (100,770) are considered severely cost burdened (paying more than 50% of their income towards housing costs).

## **Gaps Analysis: At-risk of Homelessness**

An analysis of American Community Survey (ACS) and CHAS data suggest a significant shortage in affordable housing in Minnesota based on estimated need. CHAS data analyzed by Minnesota Housing shows that there are 176,855 households with income less than 30% AMI in Minnesota while there are only 119,500 rental units across the state that are considered affordable to households under 30% of AMI. This leaves an affordable rental unit gap of at least 57,355 units. However, this problem is further exacerbated by the fact that of the total number of available units for this population, over 43% (51,755) are occupied by renters making more than 30% of AMI. This situation has the effect of widening the practical gap for those in the below 30% of AMI population as units that might be affordable to them are rented by households with higher incomes. Therefore, this analysis concludes that there are 109,130 households in Minnesota with incomes below 30% of AMI that cannot find homes they can afford. A similar analysis undertaken by the National Low Income Housing Coalition suggests that there is a shortage of 99,661 rental homes affordable and available for extremely low-income households (at or below 30% AMI). Based on this analysis, it is estimated that there are only 41 affordable and available units for every 100 households in the income category. Overall, Minnesota Housing Partnership’s 2021 State of the State Report indicated that 554,272 Minnesota households pay more than 30 percent of their income toward housing costs, and 232,840 are severely cost burdened and pay more than 50 percent of their income on housing.

When considering racial disparities in cost burden, the 2021 State of the State Report also notes that the gaps between renters who are white and Black renters remains significant. In Minnesota, 44 percent of white renters are cost burdened (paying more than 30% of the income for housing) while 58 percent of Black renters — 82,364 renter households — are cost burdened across the state.

Additional analysis by Minnesota Housing also suggests that a radical shift in housing development trends will be needed to address this affordable unit gap. Based on housing construction data in the Twin Cities Metro region from 2016-2020, only 1.5% of new unit construction was developed for affordability by households below 30% of AMI. To effectively address the current gap in available affordable units for this population, a full 29% of new unit development would need to be dedicated to affordability for households below 30% (based on 10,000 units of new construction). The most recent data on housing development shows progress for reducing this gap. According to HousingLink’s MN Housing Measures report, 3,880 additional subsidized units came online in 2021. Likewise, their 2021 Housing Counts report indicates that new affordable housing development in the Twin Cities Metro increased in 2021. Minnesota saw the highest numbers of new affordable housing (60% or below AMI) units built (3,065) since 2002. Of these new, 8% (246) were affordable at 30% AMI. This progress is important but remains below the pace of affordable housing development that is necessary to

accommodate the need. In order to reach the full 29% for new unit development dedicated to affordability for households below 30% AMI, nearly 900 units would need to have been targeted for affordability in this income category – that is more than 3.5 times the number of units created.

<b>At-risk Housing Needs and Gaps Analysis Table</b>	
	<b>Total Households/Units</b>
Total Rental Units	648,545
Rental Units Affordable to HH at 30% AMI	119,500
Households with Income 0-30% AMI	176,855
0-30% AMI Affordable units occupied by HHs in other AMI brackets	51,775
<b>Affordable Rental Unit Gap</b>	<b>57,355</b>

### **QP3: Domestic Violence/Sexual Assault/Trafficking**

#### **Data: Domestic Violence/Sexual Assault/Trafficking**

While there are some local and statewide data sources available on the Domestic Violence/Sexual Assault/Trafficking QP (defined fully under the [Definitions of the Qualifying Populations](#) section), the data are generally aggregated and do not include consistent demographic or household level information. In cases where demographic data is present, the majority of reported cases list “unknown” in most categories. However, between statewide data sources and information available from CoC data sources, a useful picture of the scope of the domestic violence (DV) situation across the state takes shape.

According to the National Network to End Domestic Violence’s (NNEDV) 16th Annual Domestic Violence Counts Report for Minnesota (“NNEDV Report”), 2,421 victims/survivors of DV were served across 49 programs statewide in one day on September 9, 2021. This includes 779 adult and child victims/survivors who were served in emergency shelters, transitional housing, hotels, motels, or other housing provided by Victim Service Providers (VSPs). On this same day, 859 DV hotline calls were received across Minnesota. It is noteworthy that the number of DV victims/survivors in the CoC Point in Time count conducted on January 26, 2022, reported a similar number of DV victims/survivors (772) across the emergency shelter, transitional housing and unsheltered persons counts. While this data represents only 2 single day counts, it does suggest that the need for DV housing resources in Minnesota may be relatively consistent throughout the year based on the two one-day counts recorded.



## Size and Demographic Composition: Domestic Violence/Sexual Assault/Trafficking

	Total actively fleeing DV population by Region (10/1/2021-9/30/2022)					
	Twin Cities Metro		Greater Minnesota		Statewide**	
	All Housing Programs*	Emergency Shelter	All Housing Programs*	Emergency Shelter	All Housing Programs*	Emergency Shelter
Total	1,407	969	1,059	626	2,425	1,554
% of total adults served	9.7%	8.8%	13.3%	12.1	11.0%	9.9%
DV beds as % of total	3.7%	10.4%	8.4%	18.5%	5.0%	13.0%

\*Includes Emergency Shelter, Transitional Housing and Permanent Housing

\*\*Statewide totals are unduplicated

Annual data on domestic violence victims/survivors provided by the Statewide HMIS lead agency, Institute for Community Alliances (ICA) paints a mixed picture regarding unmet need for this population within the homeless system. According to this data, approximately 11% of all persons served during the period 10/1/2021 and 9/30/2022 across the state's CoCs identified as someone who was actively fleeing domestic violence, and looking only at emergency shelters, the proportion is just under 10%. When we compare this data against the most recent housing inventory count, we can see that in both regions (Twin Cities Metro and Greater Minnesota), the percentage of dedicated DV beds is slightly higher than the percentage of persons actively fleeing DV within the shelter system but is somewhat lower when looking at the same ratio across all housing programs. Further analysis reveals that the primary bed shortage for this population is in permanent housing: During the reporting period (10/1/2021-9/30/22), there were 648 persons actively fleeing domestic violence served in permanent housing programs statewide while the 2022 housing inventory only lists 161 dedicated Rapid Re Housing (RRH) or Permanent Supportive Housing (PSH) beds for this population. It should also be noted that these data only reflect those persons actively fleeing domestic violence that are served in HMIS participating programs. Because there are additional persons being served in domestic violence-specific projects that are not included in these totals, these figures likely do not represent all homeless persons fleeing domestic violence statewide.

As previously noted, according to the NNEDV 2,421 victims/survivors of DV were served across 49 programs statewide in one day on September 9, 2021. This includes 779 adult and child victims/survivors who were served in emergency shelters, transitional housing, hotels, motels, or other housing provided by Victim Service Providers (VSPs). On this same day, 859 DV hotline calls were received across Minnesota.

Data from Cornerstone Minnesota, a Domestic Violence service provider and advocacy group, reported that in 2021 1,877 victims/survivors of criminal domestic assault had direct contact with Criminal Justice Intervention staff and they assisted 155 victims/survivors with accessing Civil Orders for Protection. Their statewide hotline also received over 30,000 contacts in 2021.

Violence Free Minnesota, a statewide coalition of service providers for victims of domestic violence reports that more than 65,000 adults in Minnesota receive domestic violence services from programs each year and less than 50% of people who experience domestic violence ever reach out for services.

As noted in the previous section, available data resources for this qualifying population often do not include consistent demographic or household level information. However, according to national research conducted by the National Coalition Against Domestic Violence (NCADV), people who identify as Black experience DV at a disproportionately high rate, with 45.1% of Black women and 40.1% of Black men experiencing intimate partner violence or stalking in their lifetimes. NCADV also points out that American Indian and Alaska Native women experience domestic violence at much higher rates than any other ethnicity, with 55.5% experiencing intimate partner violence and 66.6% experiencing psychological abuse in their lifetimes. According to the Centers for Disease Control and Prevention (CDC), Hispanic women experience domestic violence at similar rates as the overall female population but may experience more severe barriers to services when culturally and linguistically appropriate programs are not available.

Furthermore, Minnesota has devoted substantial resources to understanding and combating the prevalence of sexual violence against Indigenous/Native American women and girls. In 2020, the State commissioned the Missing and Murdered Indigenous Women Task Force, which found that while Indigenous/Native American women and girls comprise just 1% of the population, they account for more than 8% of all murdered women/girls in the state between 2010 and 2018.

### **Human Trafficking Data**

Minnesota has devoted significant policy and financial resources to addressing human trafficking issues across the state. In 2011, the state passed the Safe Harbor Law, which, in its current implementation:

- Protects youth from being arrested or prosecuted for prostitution;
- Added the definition of sexually exploited youth to Minnesota law;
- Funded protocol development, training, and evaluation, and provides services, housing, and outreach for youth ages 24 and under, utilizing “no wrong door” approach through the deployment of regional navigators.

Safe Harbor’s No Wrong Door system is a comprehensive, multidisciplinary, and multi-state agency approach. It helps ensure that communities across Minnesota have the knowledge, skills, and resources to effectively identify sexually exploited and at-risk youth. Youth are provided with victim-centered trauma-informed services and safe housing.

During the period from 4/1/2021 through 1/11/2023, Safe Harbor conducted intake assessments on 6,402 individuals seeking services. Of these, 1,924 individuals met the eligibility requirements (ineligibility was mostly due to age) and were enrolled with grantees under the program. (While the program is restricted to only those ages 24 or younger, the program conducted assessments on individuals up to 62 years old.) Of the 1,924 individuals who were enrolled in services, about 2/3<sup>rd</sup> (66.2%) was Black, Indigenous, or Persons of Color, including 10% (183) who specifically identified a Tribal nationality. Safe Harbor grantees provided or referred 32% of enrolled individuals to housing services and 39% to housing advocacy services during this reporting period.

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As part of statewide consultations, Minnesota Housing also met directly with providers offering services to individuals coming from a human trafficking situation. One such organization, Breaking Free (located in St. Paul), provides both emergency shelter and permanent supportive housing specifically for sex trafficking victims/survivors, in addition to operating a Drop-In center and other services.

Breaking Free served 286 people in their various programs between 10/1/2021 and 9/30/22. Additionally, data from 1/1/2018 through 12/31/2021 shows total of 770 persons served of which 422 reported as being homeless and 128 experienced a disability (Cognitive/Physical/Mental). Data provided by Breaking Free also shows a wide range of victimization types, including physical assault, kidnapping, and stalking among others. On average, each person served by Breaking Free during this period reported an average of 7 forms of victimization.

Breaking Free has also emphasized the challenges that its clients face attempting to secure permanent independent housing stemming from historic criminalization of sex work in Minnesota. In many cases, victims/survivors of sex trafficking/prostitution have criminal records which is often a negative factor in their ability to rent their own units. This creates a bottleneck within their own permanent housing program whereby clients who might be ready to move on from the Break Free dedicated facility are not able to and thus newer clients with acute housing needs cannot access this vital resource. While it is acknowledged that policy changes initiated by the Safe Harbor Law are beginning to address this, it is not necessarily removing this barrier for non-youth victims/survivors attempting to re-enter the private housing market.

Other research has highlighted the troubling prevalence of trafficking among native/indigenous women and girls in Minnesota, the 2011 report, "Garden of Truth: The Prostitution and Trafficking of Native Women in Minnesota", conducted extensive interviews with 105 Native women who were prostituting in Minneapolis, Duluth and Bemidji, Minnesota. Among those interviewed, their ages ranged from 18-60 years old, and they reported an average length of time in prostitution as 14 years. Additionally, 98% of these women reported experiencing current or past homelessness and 65% had been diagnosed with a mental health condition. Significantly, among those interviewed, 75% reported that they knew of others who were being trafficked.

Additional trafficking data from the National Human Trafficking Hotline shows that in 2020, 98 new human trafficking cases were recorded statewide for Minnesota. Given that there are other state and local level resources for human trafficking already in place and available for victims/survivors in the State, Minnesota residents may be less likely to use this national hotline than in other locations.

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### Unmet Housing and Service Needs: Domestic Violence/Sexual Assault/Trafficking

According to the HIC reported on January 26, 2022, there are 7,879 emergency shelter and transitional housing beds statewide in Minnesota. Of those beds, 6,967 are specified as non-DV beds, indicating that there are 912 beds statewide dedicated for people fleeing or attempting to flee domestic violence. Of the 912 statewide beds for DV, 723 of them are emergency shelter. Approximately 53% of total dedicated DV beds statewide are in Metro Twin Cities, and the remaining 47% found across Greater Minnesota.

2022 Point in Time DV Bed Utilization						
	Twin Cities Metro		Greater Minnesota		Total	
	Shelter & Transitional	Shelter Only	Shelter & Transitional	Shelter Only	Shelter & Transitional	Shelter Only
DV dedicated beds	487	394	425	329	912	723
Reported DV population	396	298	310	225	706	523
Utilization %	81%	76%	73%	68%	77%	72%

Additionally, while there is overlap in those experiencing domestic violence and human trafficking with those who experience sexual assault, survivors of sexual assault present with slightly different needs. According to the Minnesota Coalition Against Sexual Assault, survivors of sexual assault often struggle to meet the eligibility requirements for survivors of violence resources and require long term housing programs rather than emergency shelter. Nationally, 50% of survivors who seek housing services do not receive them (National Sexual Violence Center, 2020).

### Gaps Analysis: Domestic Violence/Sexual Assault/Trafficking

As shown in the table discussed earlier (Total DV survivor population by region), the percentage of clients reporting that they actively fleeing domestic violence outpaces the percentage of dedicated DV beds that are reported statewide and regionally in permanent housing projects, but it appears that the supply of emergency shelter and transitional housing beds is sufficient to meet current demand. This tracks reasonably well with an analysis of DV bed utilization for the night of the 2022 Point in Time Count. On the night of the count, 72% of dedicated DV emergency shelter beds and 77% of all shelter and transitional beds were in use on the night of the count. This data suggests that if HOME ARP resources are to be directed to additional housing options for those fleeing domestic violence, emphasis should be given to added additional permanent housing beds as the state's emergency shelter and transitional housing projects seem to be meeting the needs of this qualifying population with the current inventory.

## QP4: Other Populations

### Data: Other Populations

The fourth eligible QP under HOME ARP is other populations where providing HOME ARP supportive services or assistance would prevent the family's homelessness or would serve those with the greatest risk of housing instability. The full definition is referenced in this plan under [Definitions of the Qualifying Populations](#) and is available in the [Notice CPD-21-10: Requirements for the Use of Funds in the HOME ARP Program](#). Data sources on Other Populations is less robust than for the other QPs. However, local 211 data, the statewide [Emergency Rental Assistance Program \(ERAP\)](#), and information gathered through HOME ARP consultation meetings triangulated with statewide Comprehensive Housing Affordability Strategy (CHAS) data, provide a strong understanding of the size, demographic makeup, and needs of this population.

ERAP is a U.S. Department of Treasury program funded through states and other local administrators. Minnesota Housing's ERAP program, known locally as RentHelpMN, was established in early 2021 to help at-risk populations mitigate the financial impacts of the COVID-19 pandemic. While the federally defined eligibility criteria for ERAP do not match those of HOME ARP, utilization of the program provides a useful source of data to help quantify housing instability across the jurisdiction. ERAP-eligible households must meet the following criteria:

- A household must be responsible to pay rent on a residential property, and;
- One or more people within the household have qualified for unemployment benefits, had a decrease in income, had increased household costs, or experienced other financial hardship due directly or indirectly to the COVID-19 pandemic;
- One or more individuals in the household can show a risk of experiencing homelessness or housing instability; and
- The household has an income at or below 80% of AMI.

Size and Demographic Composition: Other Populations From January 2021 through June 2022, across the state of Minnesota (including state, county and city assistance) a total of 258,311 instances of assistance were provided to households via the ERAP program. Of this total, approximately 79% (203,308) of those receiving payments received them for rent or rent arrears.

Minnesota ERAP Assistance*				
	HHs assisted with rent/rent arrears	HHs assisted with utilities/utility arrears	HHs receiving other assistance	Total
ERAP1	118,812	36,560	18	155,390
ERAP2	84,496	18,083	342	102,921
<b>Total</b>	<b>203,308</b>	<b>54,643</b>	<b>360</b>	<b>258,311</b>

\* U.S. Department of Treasury Report - Household counts are reflective of the combined total of households served in each of the 6 quarters (Q1 2021 through Q2 2022) and are not unduplicated. It is acknowledged that these data a) count HHs in each Q they received assistance and b) the same HH could have received assistance in any/all of these three categories.

### Unmet Housing and Service Needs: Other Populations

As stated above in [Unmet Housing and Service Needs: At-risk of Homelessness](#), the total number of rental units in Minnesota is approximately 648,545 units (according to the 2015-2019 CHAS report). Of these, approximately 263,640 units are considered affordable to households with incomes at greater than 30% but less than 50% AMI. CHAS identified 86,290 households with income between 30-50% AMI and one or more housing problems defined as incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, or cost burden greater than 30% (including 20,480 with severe housing cost burden), and of 125,075 renter households overall, there are estimated to be 251,230 units across the state affordable to households in that income bracket.

### Gaps Analysis: Other Qualifying Populations

At first glance, the figures noted above would suggest that there is not an affordable housing shortage for households earning between 30 and 50% of AMI. However, this data is complicated by the fact that many of the units considered affordable for households in this income bracket are being rented by households with higher (or lower) incomes. CHAS data indicates that nearly 75% of units affordable in the 30-50% AMI range are rented by households in other income categories. When rented by households with lower incomes, these households will be experiencing additional cost burden (as discussed in the “At-Risk of Homelessness” section), and when rented by those in higher income categories who could likely afford more expensive units, it reduces the available housing stock for households in this income target range.

Data from the National Low Income Housing Coalition’s Minnesota Affordable Housing 101 report shows that households in this income bracket have better access to affordable housing than those considered at-risk of homelessness (less than 30% of AMI), but housing availability is still low. For households between 30% and 50% of AMI NLIHC estimates that there are only 74 affordable units available for every 100 households.

Other Populations Housing Needs and Gaps Analysis Table	
	Total Households/Units
Total Rental Units	648,545
Rental Units Affordable to Households at 30-50% AMI	251,230
Households with Income 30-50% AMI	125,070
30-50% AMI Affordable units occupied by Households in other AMI brackets	187,210
<b>Affordable Rental Unit Gap</b>	<b>61,050</b>

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## **HOME ARP Activities**

### **Methods for Soliciting HOME ARP Applications**

Minnesota Housing will solicit HOME ARP applications from local government units, developers, and/or service providers to implement eligible activities that are identified and prioritized in this plan.

Minnesota Housing will hold a separate RFP process specific for and tailored to HOME ARP activities. Minnesota Housing will provide notice of request for proposal to interested applicants and it will include information on requirements, selection criteria, timelines, and process, including those who provided public feedback for the allocation plan. The notice of the RFP will be posted on the Agency's website, and we will pursue additional methods to reach potential applicants that may include: targeting parts of the state that have not historically participated in the grant application process, culturally specific and community-based organizations, e-mail, agency distribution lists, and the Minnesota State Register. The Agency will also create a webinar ahead of the application deadline to provide guidance and information about the RFP. Selections would be required to be approved by the Minnesota Housing Board of Directors.

### **Administration of Funds**

Minnesota Housing will not utilize a subrecipient or contractor for the administration of the PJ's entire HOME ARP grant. Minnesota Housing will oversee the administration of HOME ARP funding but will not administer activities directly. Written agreements will be executed with selected developers that will undertake and administer the funded projects. A portion of Minnesota Housing's administrative funds will be used for staffing, contracting with ICF, International for allocation plan and implementation planning support.

## Use of HOME ARP Funding

Activities	Funding Amount	Percent of the Grant	Statutory Limit
Development of Affordable Rental Housing	\$27,710,000	89%	
Non-Profit Capacity Building	\$310,000	1%	5%
Administration and Planning	\$3,117,836	10%	15%
<b>Total HOME ARP Allocation</b>	<b>\$31,137,836</b>		

## Rationale for Planned Activities

The State of Minnesota faces a significant affordable housing crisis, with a significant number of individuals and families struggling to afford safe and decent housing. Addressing this issue will require a comprehensive approach that prioritizes the construction of deeply affordable housing and the strengthening of non-profit organizations' capacity to operate and comply with the funding regulations. Consultations highlighted the limited availability of affordable housing units has resulted in an increasing number of households experiencing homelessness, and even those with rental assistance struggle to secure deeply affordable units with low barrier entry. Moreover, the current affordable housing stock suffers from rehabilitation needs, lacks variety in unit sizes to cater to both large and small households, and is often located in areas with limited amenities. Expanding the supply of affordable housing would facilitate the broader and more convenient utilization of existing rental assistance and housing voucher programs by investing in affordable housing, we can provide families with safe, healthy, and affordable homes, which will have a positive impact on their overall well-being. Ultimately, investing in affordable housing and non-profit capacity to implement the HOME ARP funding is the only viable path forward to create long-term lasting change and improve the lives of those most in need in the State of Minnesota.

Besides the engagement and data results that prioritized affordable rental development, the Agency also considered proposed resources included in the Governor's 2023 budget for Minnesota Housing and the anticipated resources associated that will be available at the end of the Legislative session. These include significant and potentially on-going resources for emergency rental assistance, rental assistance, capacity building and affordable housing development. The Governor's budget would increase state appropriations by \$726.5 million for nearly every existing agency program. The agency's base budget is \$115.6 million. The agency expects to have new resources for all the HOME-ARP eligible activities.

## Production Housing Goals

Based on the HOME ARP allocation, Minnesota Housing estimates the development of approximately 80 rental units with a per unit average cost of \$395,000. Minnesota Housing is prioritizing rental housing development, with a preference for the first qualifying population – those experiencing homelessness. These numbers continue to increase throughout the State, and both the quantitative and qualitative data gathered through the HOME ARP allocation plan process confirm the need for this priority.



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## Preferences

Minnesota Housing intends to give preferences to the following: QP1: Homeless.

While Minnesota Housing acknowledges the substantial needs across the state for all qualifying populations, based on the gaps analysis showing significant need of rental housing units to meet demand, combined with the feedback from consultation, surveys, and public comment, the greatest unmet needs are in the population experiencing homelessness, or QP1.

HOME ARP funds will be dispersed through a separate RFP process described in [Methods of Soliciting Application](#) section of this plan. Preference points will be given to projects that propose to prioritize QP 1.

## Methods of Prioritization and Referral Methods

Minnesota Housing will instruct projects to use Coordinated Entry with other referral methods or project specific waitlists for tenant selection based on a local jurisdiction's needs and capacity. For projects that allow for Coordinated Entry as a referral method, CE referrals will be indirect and added to a project specific waitlist that is in chronological order of receipt. All qualifying populations will have access to be referred to the projects. Minnesota Housing will not adopt the method of prioritization of the various CE systems statewide. Projects not using the preference will use project specific waitlists for all QPs in a chronological order, insofar as practicable.

## Limitations

All qualifying populations will have access to HOME ARP funded projects. Minnesota Housing does not intend to impose a limitation on any of the qualifying populations in any HOME ARP projects.

## Statement of Commitment to Fair Housing

Minnesota Housing is committed to the principles of fair housing and to ensuring that all individuals, regardless of their race, color, national origin, religion, sex, familial status, or disability, have equal access to housing and related services. We are dedicated to promoting diversity, inclusion, and equity in all aspects of our operations.

Minnesota Housing shall ensure adherence to all pertinent Fair Housing and nondiscrimination statutes and regulations as described in 24 CFR 5.105(a) while referring individuals for HOME ARP services. Furthermore, any and all collaborators who receive HOME ARP funding will comply with all relevant fair housing, civil rights, and nondiscrimination regulations, which shall include, but not be limited to, those delineated in 24 CFR 5.105(a). Such regulations shall comprise the Fair Housing Act, Title VI of the Civil Rights Act, section 504 of the Rehabilitation Act, HUD's Equal Access Rule, and the Americans with Disabilities Act.

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## Appendices

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### **Contents:**

- A. Organization List for Consultations**
- B. Organization Attendee List for the Public Hearing**
- C. State Register Public Hearing Notice**
- D. Public Hearing and Survey Enews**
- E. Public Comment Notice: Round One**
- F. Public Comments Received: Round One**
- G. Public Comment Notice: Round Two**
- H. Public Comments Received: Round Two**

## A. Organization List for Consultations

Organization Name	Organization type
Bi-County Community Action Programs, Inc.	Community Action Agency
Community Action Partnership of Scott Carver & Dakota Counties	Community Action Agency
Kootasca Community Action Inc.	Community Action Agency
Lakes & Prairies Community Action Partnership	Community Action Agency
Lakes and Pines Community Action Council	Community Action Agency
Minnesota Valley Action Council	Community Action Agency
Three Rivers Community Action	Community Action Agency
Tri-County Action Program (Tri-CAP)	Community Action Agency
Tri-Valley Opportunity Council, Inc	Community Action Agency
United Community Action Partnership	Community Action Agency
We Can MN	Community Action Agency
West Central Minnesota Communities Action Inc	Community Action Agency
Mahube-Otwa Community Action Partnership, Inc.	Community Action Agency
Prairie Five Community Action Council, Inc.	Community Action Agency
Dakota, Anoka, Washington, Scott, Carver Counties Continuum of Care	<b>Continuum of Care</b>
Duluth/Saint Louis County Continuum of Care	Continuum of Care
Minneapolis/Hennepin County Continuum of Care	Continuum of Care
Moorhead/West Central Minnesota Continuum of Care	Continuum of Care
Northeast Minnesota Continuum of Care	Continuum of Care
Northwest Minnesota Continuum of Care	Continuum of Care
Rochester/Southeast Minnesota Continuum of Care	Continuum of Care
Saint Paul/Ramsey County Continuum of Care	Continuum of Care
Southwest Minnesota Continuum of Care	Continuum of Care
St. Cloud & Central Minnesota Continuum of Care	Continuum of Care
River Valleys Continuum of Care	Continuum of Care
Minnesota Tribal Collaborative	Continuum of Care (pending)
360 Communities	<b>Domestic violence/victims of sex and human trafficking service provider</b>
Anna Marie's Alliance	Domestic violence/victims of sex and human trafficking service provider
Asian Women United of Minnesota	Domestic violence/victims of sex and human trafficking service provider
Breaking Free	Domestic violence/victims of sex and human trafficking service provider

Organization Name (Continued)	Organization type
Esperanza United	Domestic violence/victims of sex and human trafficking service provider
Minnesota Coalition Against Sexual Assault	Domestic violence/victims of sex and human trafficking service provider
Relationship Safety Alliance	Domestic violence/victims of sex and human trafficking service provider
Sexual Violence Center	Domestic violence/victims of sex and human trafficking service provider
Violence Free Minnesota	Domestic violence/victims of sex and human trafficking service provider
Women's Advocates	Domestic violence/victims of sex and human trafficking service provider
EMERGE MN	Economic development services
Northside Economic Opportunity Network	Economic development services
SOAR Career Solutions	Economic development services
StartAnew	Economic development services
Workforce Development, Inc	Economic development services
R.A.I.N. Homes	Faith-based organization
Health Access MN	Healthcare
Centra Care Health Systems	Healthcare provider
Minnesota Community Care	Healthcare provider
Rainbow Health Minnesota	Healthcare provider
Institute for Community Alliances	HMIS provider
AI - Maa'uun	<b>Homeless service provider</b>
Alluma Cares	Homeless service provider
American Indian Community Housing Organization	Homeless service provider
Amerst H. Wilder Foundation	Homeless service provider
Avivo	Homeless service provider
Catholic Charites of St Paul and Minneapolis	Homeless service provider
CHUM	Homeless service provider
Family Promise of Kandiyohi County	Homeless service provider
Haven Housing	Homeless service provider
Heading Home Minnesota Funders Collaborative	Homeless service provider
Jeremiah Program	Homeless service provider
Minnesota Dakota Woodlands	Homeless service provider
Missions Inc. Programs	Homeless service provider
Mn Engagement on Shelter & Housing (MESH)	Homeless service provider
Open Your Heart to the Hungry and Homeless	Homeless service provider
Our Saviour's Community Services	Homeless service provider
Partners for Housing	Homeless service provider
People Serving People, Inc.	Homeless service provider
Range Transitional Housing	Homeless service provider
Sakan Community Resource	Homeless service provider

Organization Name (Continued)	Organization type
Stepping Stones Emergency Housing	Homeless service provider
The Link Minnesota	Homeless service provider
The Salvation Army USA	Homeless service provider
Volunteers of America	Homeless service provider
Center City Housing Corporation	Homeless service provider, Housing developer
Catholic Charities - St Cloud Diocese	Homeless service provider, Mental health services, <b>organization that addresses the needs of persons with disabilities</b>
Pursuit Hometel, Inc.	Homeless service provider, Mental health services, organization that addresses the needs of persons with disabilities
House of Refuge	Homeless service provider, social services, youth education
One Day at a Time	Homeless service provider, supportive services
Anishinaabe Endaad	Homeless service provider, Tribal organization
Bois Forte Band of Chippewa	Homeless service provider, Tribal organization
Red Lake Nation	Homeless service provider, Tribal organization
Sojourner Project Inc	Homeless service provider, victims of sex and human trafficking service provider
180 Degrees	Homeless youth service provider
Avenues for Youth	Homeless youth service provider
MoveFwd, MN	Homeless youth service provider
Youthprise	Homeless youth service provider
HousingLink	Homelessness prevention
Presentation Partners in Housing	Homelessness prevention, homeless service provider
Isuroon	Homelessness prevention, social services
Integrated Community Solutions	Housing assistance, social services
Beacon Interfaith Housing Collaborative	Housing developer
Bremer Bank	Housing developer
Central Minnesota Housing Partnership, Inc.	Housing developer
CommonBond Communities	Housing developer
Duffy Development Group	Housing developer
Front Door Development	Housing developer
JB Vang	Housing developer
Mn National Association of Housing Redevelopment Organizations	Housing developer
One Roof Housing	Housing developer
Project for Pride in Living, Inc	Housing developer
RE/Max Real Estate Company	Housing developer
Rebuilding Together, MN	Housing developer
Ripley Richard Real Estate Development Services, LLC	Housing developer
Sand Development, LLC	Housing developer

<b>Organization Name (Continued)</b>	<b>Organization type</b>
<b>Southwest Minnesota Housing Partnership</b>	Housing developer
<b>Tapestry Companies</b>	Housing Developer
<b>Twin Cities Habitat for Humanity</b>	Housing Developer
<b>Wellington Management, Inc.</b>	Housing developer
<b>Woda Cooper Companies, Inc.</b>	Housing developer
<b>Goodhue County Habitat for Humanity</b>	Housing developer, social services
<b>Habitat for Humanity, MN</b>	Housing developer, social services
<b>Minnesota Indian Womens Resource Center</b>	Housing developer, social services
<b>Anoka County Department of Community and Governmental Relations</b>	<b>Local government, public agency that served the needs of the qualifying populations (All QPs)</b>
<b>Anoka County Department of Community Social Services &amp; Behavioral Health</b>	Local government, public agency that served the needs of the qualifying populations (All QPs)
<b>Anoka County, Minnesota</b>	Local government, public agency that served the needs of the qualifying populations (All QPs)
<b>Benton County, Minnesota</b>	Local government, public agency that served the needs of the qualifying populations (All QPs)
<b>Carver County, Minnesota</b>	Local government, public agency that served the needs of the qualifying populations (All QPs)
<b>City of Adrian, MN</b>	Local government, public agency that served the needs of the qualifying populations (All QPs)
<b>City of Mankato, MN</b>	Local government, public agency that served the needs of the qualifying populations (All QPs)
<b>City of Minneapolis, MN</b>	Local government, public agency that served the needs of the qualifying populations (All QPs)
<b>City of Saint Paul, MN</b>	Local government, public agency that served the needs of the qualifying populations (All QPs)
<b>Dakota County, MN</b>	Local government, public agency that served the needs of the qualifying populations (All QPs)
<b>Hennepin County Library</b>	Local government, public agency that served the needs of the qualifying populations (All QPs)
<b>Hennepin County, Minnesota</b>	Local government, public agency that served the needs of the qualifying populations (All QPs)
<b>Mankato Economic Development Authority</b>	Local government, public agency that served the needs of the qualifying populations (All QPs)
<b>MN Department of Health</b>	Local government, public agency that served the needs of the qualifying populations (All QPs)
<b>Olmsted County, Minnesota</b>	Local government, public agency that served the needs of the qualifying populations (All QPs)
<b>Otter Tail County, Minnesota</b>	Local government, public agency that served the needs of the qualifying populations (All QPs)
<b>Ramsey County, MN</b>	Local government, public agency that served the needs of the qualifying populations (All QPs)

Organization Name (Continued)	Organization type
Scott County, Minnesota	Local government, public agency that served the needs of the qualifying populations (All QPs)
Sherburne County, Minnesota	Local government, public agency that served the needs of the qualifying populations (All QPs)
St Louis County, Minnesota	Local government, public agency that served the needs of the qualifying populations (All QPs)
Stearns County, Minnesota	Local government, public agency that served the needs of the qualifying populations (All QPs)
Washington County, Minnesota	Local government, public agency that served the needs of the qualifying populations (All QPs)
The Family Partnership	Mental health services, domestic violence or human trafficking victim service provider
Community Mediation & Restorative Services	Mental health services, organization that addresses the needs of persons with disabilities
HAVEN, INT'L	Mental health services, organization that addresses the needs of persons with disabilities
Human Development Center	Mental health services, organization that addresses the needs of persons with disabilities
Meridian Behavioral Health	Mental health services, organization that addresses the needs of persons with disabilities
Nivon Wellness Center	Mental health services, organization that addresses the needs of persons with disabilities
Northland Counseling Center	Mental health services, organization that addresses the needs of persons with disabilities
NUWAY Alliance	Mental health services, organization that addresses the needs of persons with disabilities
People Incorporated	Mental health services, organization that addresses the needs of persons with disabilities
Sandford Health	Mental health services, organization that addresses the needs of persons with disabilities
Stage by Staige	Mental health services, organization that addresses the needs of persons with disabilities
Tufts Health Plan	Mental health services, organization that addresses the needs of persons with disabilities
We Care Home Health Services, LLC	Mental health services, organization that addresses the needs of persons with disabilities
Affordable Housing Connections	<b>Organization that addresses fair housing and civil rights</b>
Home Line MN	Organization that addresses fair housing and civil rights, legal assistance to prevent homelessness
Housing Justice Center	Organization that addresses fair housing and civil rights, legal assistance to prevent homelessness

Organization Name (Continued)	Organization type
Legal Services of Northwest Minnesota	Organization that addresses fair housing and civil rights, legal assistance to prevent homelessness
Southern Minnesota Regional Legal Services Inc.	Organization that addresses fair housing and civil rights, legal assistance.
Age Well at Home	Organization that addresses the needs of persons with disabilities
Eva Sophia Project	Organization that addresses the needs of persons with disabilities
Metropolitan Interfaith Council on Affordable Housing	Other: Affordable housing advocacy group
Coldwell Banker Realty	Other: Real Estate Company
Security Bank & Trust Company	Other: Bank
Applebaum Consulting	Other: Company
Artspace	Other: Company
Boisclair Corporation	Other: Company
Liberty Packaging	Other: Company
UPS	Other: Company
Garcia Services, LLC	Other: Consultant
Northwest Minnesota Foundation	Other: Foundation
Minnesota Realty	Other: Real Estate company
National Financial Services/Real Estate	Other: Real Estate company
St Catherine University, University in Minnesota	Other: University
University of Minnesota	Other: University
MN Department of Corrections	Public agency that addresses the needs of the qualifying populations (All QPs)
MN Department of Human Services	Public agency that addresses the needs of the qualifying populations (All QPs)
United States District Court District of Minnesota	Public agency that addresses the needs of the qualifying populations (All QPs)
Clay County Housing/Redevelopment Authority	Public Housing Authority
Fergus Falls Housing/Redevelopment Authority	<b>Public Housing Authority</b>
Hutchinson Housing & Redevelopment Authority	Public Housing Authority
Minneapolis Public Housing Authority	Public Housing Authority
Montevideo Housing/Redevelopment Authority	Public Housing Authority
Moorhead Public Housing Agency	Public Housing Authority
Red Wing Housing & Redevelopment Authority	Public Housing Authority
Community Mediation Minnesota	Social services
Comunidades Latinas Unidas en Servicio	Social services
Freedom Works	Social services
Greater Minneapolis Council of Churches	Social services
Greater Twin Cities United Way	Social services
Harm Reduction Sisters	Social services



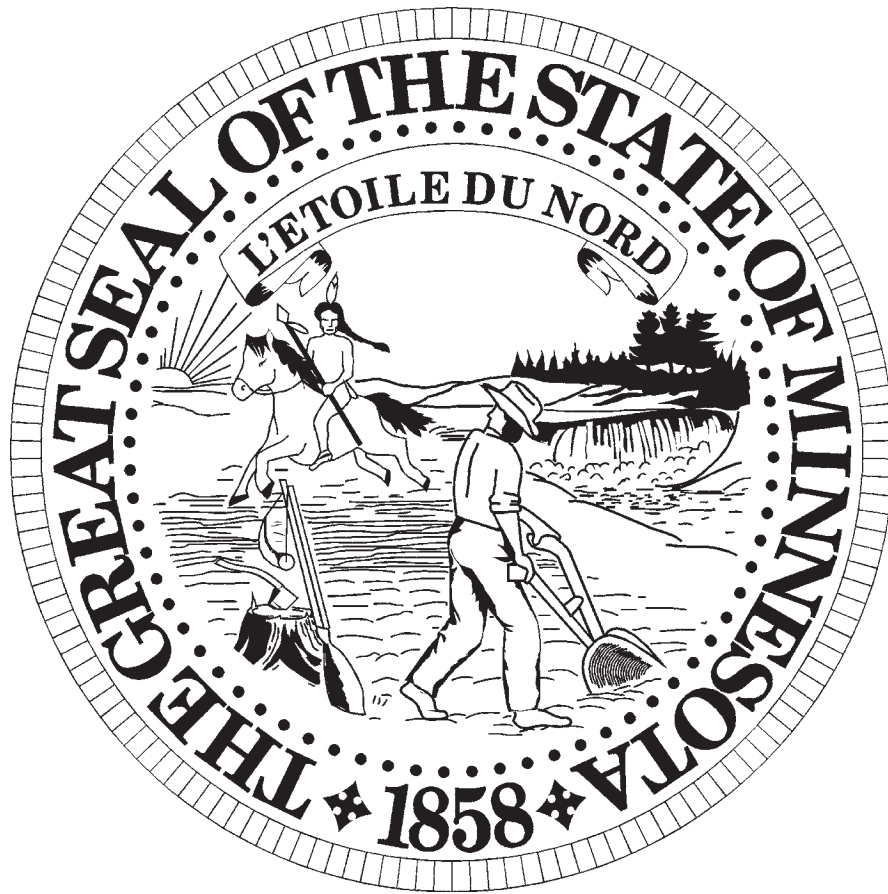
Organization Name (Continued)	Organization type
Hope Care PCA, Inc	Social services
Lutheran Social Services of Minnesota	Social services
Neighborhood House	Social services
North Homes Children and Family Services	Social services
Restorative Justice Community Action	Social services
Stair Step Foundation	Social services
Ostara Initiative	Supportive services, re-entry, legal assistance
Boise Forte Band of Chippewa	Tribal Nation/Government
Lower Sioux Indian Community	Tribal Nation/Government
Red Lake Band of Chippewa	Tribal Nation/Government
Upper Sioux Community Pezihutazizi Oyate	Tribal Nation/Government
White Earth Nation	Tribal Nation/Government
Northwest Indian Community Development Center	Tribal Organization, community services
Minnesota Department of Veteran Affairs	<b>Veteran's group</b>
Minnesota Assistance Council for Veterans	Veteran's group

## B. Organization List of Public Hearing

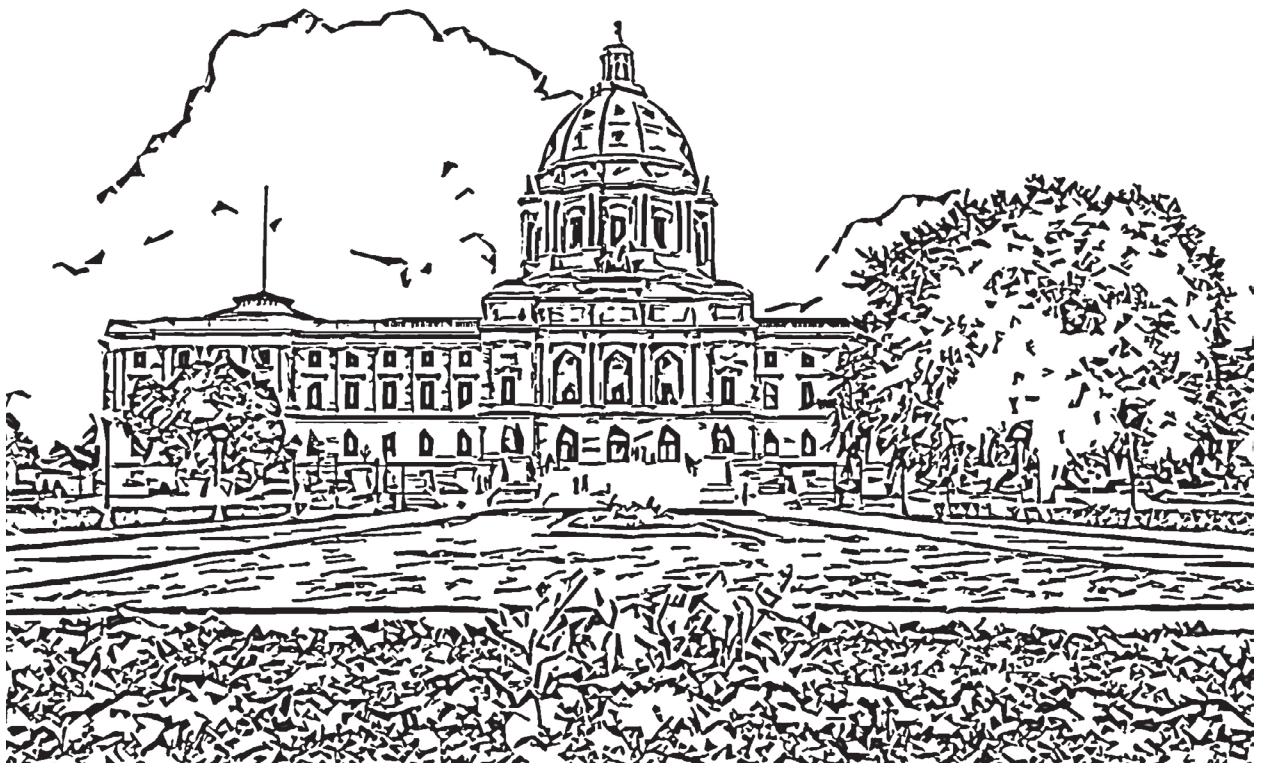
The following organizations attended the Minnesota Housing public hearing on February 1, 2023.

<ul style="list-style-type: none"> <li>• Applebaum Consulting</li> <li>• Boisclair Corporation</li> <li>• Coldwell Banker Realty</li> <li>• Front Door Development</li> <li>• Artspace</li> <li>• Kootasca Community Action</li> <li>• Comunidades Latinas Unidas En Servicio</li> <li>• National Financial Services/Real Estate</li> <li>• Security Bank &amp; Trust Company</li> <li>• City of St Paul</li> <li>• Community Mediation Restorative Services</li> <li>• Fergus Falls Housing/Redevelopment Authority</li> <li>• Tri-Valley Opportunity Council, Inc</li> <li>• Montevideo Housing/Redevelopment Authority</li> <li>• Minnesota Valley Action Council</li> <li>• Neighborhood House</li> <li>• The Salvation Army USA</li> <li>• Simpson Housing Services</li> </ul>	<ul style="list-style-type: none"> <li>• Bois Forte Band</li> <li>• Catholic Charities of St Paul and Minneapolis</li> <li>• Habitat for Humanity, MN</li> <li>• Integrated Community Solutions</li> <li>• Metropolitan Interfaith Council on Affordable Housing</li> <li>• Rebuilding Together, MN</li> <li>• Jeremiah Program</li> <li>• Minnesota Coalition Against Sexual Assault</li> <li>• Affordable Housing Connections</li> <li>• Goodhue County Habitat for Humanity</li> <li>• Minnesota Realty</li> <li>• Women’s Advocates</li> <li>• Minnesota Assistance Council for Veterans</li> <li>• Project for Pride in Living, Inc</li> <li>• Lutheran Social Services, MN</li> <li>• City of Adrian, MN</li> <li>• Keller Williams Realty</li> <li>• RE/Max Real Estate Company</li> <li>• Stair Step Foundation</li> <li>• Ottertail County, Minnesota</li> </ul>	<ul style="list-style-type: none"> <li>• Sexual Violence Center</li> <li>• One Day at a Time</li> <li>• Presentation Partnership Housing</li> <li>• Community Resource Connections</li> <li>• Central Minnesota Housing Partnership</li> <li>• One Roof Housing</li> <li>• Eva Sophia Project</li> <li>• City of Minneapolis, MN</li> <li>• Dakota County, MN</li> <li>• Rainbow Health</li> <li>• Garcia Services, LLC</li> <li>• Sakan Community Resource</li> <li>• MoveFwd, MN</li> <li>• Age Well at Home</li> <li>• MN Housing Affairs</li> <li>• Twin Cities Habitat for Humanity</li> <li>• Hope Care PCA, Inc</li> <li>• Youthprise</li> <li>• Woda Cooper Companies, Inc.</li> <li>• We Can MN</li> </ul>
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C. State Register Public Hearing Notice















o 651.296.9825.

If you have any questions about registration for this community meeting, contact Heather Dillashaw, consultant with ICF International LLC, at [hdillashaw@icf.com](mailto:hdillashaw@icf.com).

40 CFR § 124.8 and 124.56 and Minn R. 7001.0100, subp. 3.

fact sheet has also been prepared according to











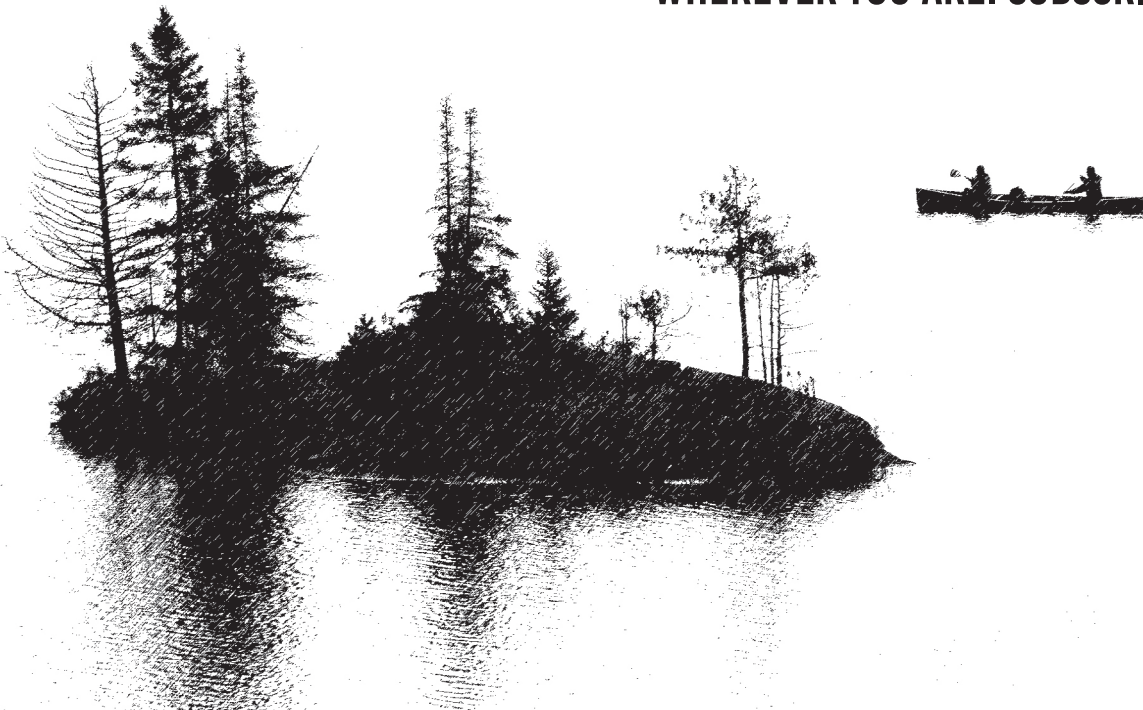








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## D. Public Hearing and Survey Enews

**From:** [Minnesota Housing](#)  
**To:** [Lindberg, Lori \(MHFA\)](#)  
**Subject:** HOME ARP Funding: Public Hearing and Survey  
**Date:** Tuesday, January 24, 2023 1:58:02 PM

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Minnesota Housing logo



## Minnesota Housing eNews

January 24, 2023

### **HOME American Rescue Plan Funding: Public Hearing and Survey**

Minnesota Housing wants your input on HOME American Rescue Plan (HOME ARP) funding.

#### **Public Hearing Notice**

A public hearing on the HOME ARP will be held on Wednesday, February 1, from 4 to 5:30 p.m.

The public hearing will provide background on the HOME ARP award and its potential uses and allow an opportunity for public comment.

**Note:** This hearing is not a workshop or training. It is intended to solicit the comments of the public.

**Register for the HOME ARP Public Hearing**

After registering, you will receive details about joining the webinar. The GoTo Webinar ID is 348-331-499.

Written comments may also be submitted to [mhfa.home-arp@state.mn.us](mailto:mhfa.home-arp@state.mn.us) and will be considered at the hearing.

**Accommodations for Language or Disability**

If you need an accessibility accommodation because of language or a disability, contact the Agency by January 26 at [mn.housing@state.mn.us](mailto:mn.housing@state.mn.us) or 651.296.9825.

Si necesita una adaptación de accesibilidad, envíenos un correo electrónico a [mn.housing@state.mn.us](mailto:mn.housing@state.mn.us) o llámenos al 651.296.9825.

Haddii aad u baahan tahay u fududaynta naafada, nagala soo xiriir [mn.housing@state.mn.us](mailto:mn.housing@state.mn.us) ama 651.296.9825.

Yog tias koj xav tau kev pab kom koj ua tau, tiv tauj peb ntawm tus [mn.housing@state.mn.us](mailto:mn.housing@state.mn.us) los yog 651.296.9825.

**Survey**

Minnesota Housing is looking for feedback on how to allocate approximately \$31M of HOME ARP funds. Please complete the survey by 5 p.m. (Central time) on Tuesday, January 31.

**Survey Links**

- [HOME-ARP Consultation Needs Survey for Minnesota Housing](#)
- [Encuesta de consulta de necesidades de HOME ARP para las viviendas de Minnesota](#)
- [Daraasadeynta Talabixinta HOME ARP ee Guriyeynta Minnesota](#)
- [Kev Ntsuam Xyuas Txog Cov Kev Xav Tau Fab Kev Pab Tswv Yim ntawm HOME ARP rau Haujlwm Vaj Tsev hauv Minnesota](#)

The survey should take no more than 5 to 10 minutes. You can remain anonymous or identify yourself or your organization. We will use responses to inform our funding allocation decisions.

Once we review all survey responses and other feedback, we will share the results in the draft HOME ARP Allocation Plan. We plan to publish this in March.

The survey is also available on our [HOME ARP webpage](#).

## What is HOME ARP?

Authorized by the American Rescue Plan Act of 2021, Minnesota Housing was awarded approximately \$31 million to increase housing stability. The one-time allocation will address the needs of individuals experiencing homelessness or at risk of homelessness.

The HOME ARP Allocation Plan describes how we intend to distribute HOME ARP funds, including how we will address the needs to HOME ARP qualifying populations.

Minnesota Housing is conducting engagement sessions with community partners to determine how best to use the funds. A gaps and needs analysis of the qualifying populations will help prepare the Allocation Plan.

## Questions?

To learn more, visit the [HOME ARP webpage](#) or email [mhfa.home-arp@state.mn.us](mailto:mhfa.home-arp@state.mn.us).

You can also request a HOME ARP overview by calling 651.297.5152 or sending a written request to:

Minnesota Housing  
400 Wabasha Street N., Ste. 400  
St. Paul, MN 55102

[www.mnhousing.gov](http://www.mnhousing.gov)

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## E. Public Comment Period Notice

---

**From:** Minnesota Housing <MNHousing@public.govdelivery.com>  
**Sent:** Wednesday, March 1, 2023 3:27 PM  
**To:** Ganani, Rachel (MHFA)  
**Subject:** Notice of Public Comment Period: HOME American Rescue Plan Draft Allocation Plan

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# Minnesota Housing eNews

March 1, 2023

## Notice of Public Comment Period: HOME American Rescue Plan Draft Allocation Plan

Minnesota Housing prepared a HOME American Rescue Plan (ARP) Draft Allocation Plan based on feedback from meetings with community members, an online survey and a public hearing.

The Draft Allocation Plan describes how HOME ARP funds will be distributed, including how the funds will address the needs of [qualifying populations](#).

Starting today, you can review the [Draft Allocation Plan](#) and send us your written comments.

Written comments must be received by Thursday, March 16, at 5 p.m. (Central time). You can submit feedback by:

- **Email:** [MHFA.HOME-ARP@state.mn.us](mailto:MHFA.HOME-ARP@state.mn.us), include “HOME ARP Draft Allocation Plan” in the subject line
- **Mail:** Minnesota Housing  
HOME ARP Draft Allocation Plan

400 Wabasha St. N., Ste. 400  
St. Paul, MN 55102

### **Accommodations for Language or Disability**

If you would like a hard copy of the Draft Allocation Plan or need an accessibility accommodation, email [MHFA.HOME-ARP@state.mn.us](mailto:MHFA.HOME-ARP@state.mn.us).

Si necesita una adaptación de accesibilidad, envíenos un correo electrónico a [MHFA.HOME-ARP@state.mn.us](mailto:MHFA.HOME-ARP@state.mn.us).

Haddii aad u baahan tahay u fududaynta naafada, nagala soo xiriir [MHFA.HOME-ARP@state.mn.us](mailto:MHFA.HOME-ARP@state.mn.us).

Yog tias koj xav tau kev pab kom koj ua tau, tiv tauj peb ntawm tus [MHFA.HOME-ARP@state.mn.us](mailto:MHFA.HOME-ARP@state.mn.us).

### **What happens to the written comments?**

A summary of comments and recommendations and Minnesota Housing's response to them will be included in the final HOME ARP Allocation Plan and will help finalize the planning document.

The final HOME ARP Allocation Plan will be submitted to the U.S. Department of Housing and Urban Development (HUD) by March 31, 2023.

### **What is HOME ARP?**

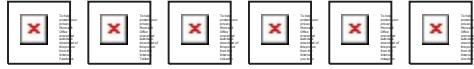
Authorized by the American Rescue Plan Act of 2021, Minnesota Housing was awarded approximately \$31 million to increase housing stability. The one-time allocation will address the needs of individuals experiencing homelessness or at risk of homelessness. HUD must approve the HOME ARP Allocation Plan before funds can be made available. Based on the results of the allocation plan and HUD's review, Minnesota Housing will then prepare an implementation plan that identifies how the funds will be made available for the eligible uses defined by HUD.

### **Questions?**

To learn more about HOME ARP, [visit the Home ARP webpage](#). You can also contact Rachel Ganani at 651.297.3120.

[www.mnhousing.gov](http://www.mnhousing.gov)

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## F. Public Comments Received

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**From:**  
**Sent:**  
**To:** MN\_MHFA\_HOME-ARP  
**Subject:** CAPI USA: Home ARP Draft Allocation Plan

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Minnesota Housing released an allocation plan draft that I want to offer a response to on behalf of CAPI. Wanted to get some clearance from you on the language

For starters let me say that nobody is upset about more affordable housing being made. This is clearly very well researched. However, the amount of proposed affordable housing will barely make a dent in the current demand and needs several years from now. What is more, this allocation doesn't commit to hard numbers or definitions on what an "affordable" property will be, we here at CAPI worry this will just be more of the same: too little, too late, and too detached from the actual needs of the most vulnerable communities.

1: The sample size of consultation is too small, especially when considering historically excluded communities and too much emphasis was given to institutional powers for consultation. All this illuminates why the polled priorities lined up with long term "affordable" housing projects without clearly defining its meaning nor proposing any adequate measures to show success or failure.

2: What will "affordable" mean beyond the AMI (which is already a faulty metric)? How many units per building will be required, and what will the average number of beds and baths be?

3: Furthermore; where are the tiny homes and permanent safe spaces for those unhoused who get turned away from shelters and need space to meet with providers? I would gladly skip out on the chance for another grant if it meant even 1 or 2 permanent spaces could be created in the Twin Cities to allow for unhoused to congregate without being harassed by state and local law enforcement

**CAPI Immigrant Opportunity Center:** 5930 Brooklyn Blvd., Brooklyn Center, MN 55429  
**Lake Street:** 3702 East Lake St., Minneapolis, MN 55406

[www.capiusa.org](http://www.capiusa.org)

## **Re: HOME ARP Allocation Plan Public Comment**

*Via Electronic Delivery*

The Minnesota Coalition Against Sexual Assault supports the overall HOME ARP plan to focus on the development of affordable rental housing. However, we are deeply concerned that individuals and families fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, and/or human trafficking are not a priority group for this housing. While there was some analysis of this qualifying population, sexual violence victims/survivors were almost entirely left out of the analysis for the plan. The qualifying population includes sexual assault victims/survivors, yet the allocation plan only includes domestic violence and human trafficking data. No data specific to sexual violence was included. While sexual violence can intersect with domestic violence and trafficking, it is a unique crime. Victims/survivors of sexual violence have distinct housing needs, which this allocation plan does not analyze or address.

Homelessness and sexual violence are often connected. Homelessness significantly increases the risk for experiencing sexual violence for women, trans people (especially trans people of color), and youth. While there is limited Minnesota-specific data, nationally 11% of women who are victims/survivors of sexual violence experience that violence in their home. Of the women who seek housing services, 50% do not receive those services (National Sexual Violence Resource Center, 2020). In our meetings with victim service providers, MNCASA has heard of victims/survivors in Minnesota being denied housing services from providers, because they were asked to “prove” their survivor status and provide additional details of their victimization. These victims/survivors were being supported by victim service providers who provided letters of support, which is all the proof that is required to qualify for the services.

The CDC estimates the economic impact of sexual violence per victim is \$122,461 (Peterson et al, 2017), with wide ranging consequences across the lives of victims/survivors, including their ability to access stable housing. Finally, we also know that sexual violence victims/survivors are less likely to need emergency shelter compared to domestic violence or trafficking victims/survivors, and more likely to need supportive services and long-term housing options (Resource Sharing Project, 2011).

The COVID-19 pandemic has exacerbated the housing needs of sexual violence victims/survivors. The pandemic forced many people to move in and quarantine with family and friends. The isolation of quarantine increased the risk of experiencing sexual violence at home. Additionally, the pandemic has put a strain on many victim service providers across Minnesota, with some needing to close their emergency shelters due to lack of staff. For this reason, it is very concerning that the allocation plan

concludes that sexual violence, domestic violence, and trafficking victims/survivors' need for emergency shelter is being met and allocates such a small amount for capacity building.

Finally, MNCASA is disappointed that we were not included in a Virtual Listening Session. We participated in the survey that was part of the consultation process, however the survey was very limited and had no open questions for additional comments related to the needs of specific qualifying populations.

We understand that HOME ARP is limited, one time funding for the state of Minnesota, and that the overall consultation process identified affordable rental housing as the highest need. For these reasons, we support the plan to focus on development of affordable rental housing. However, we ask that individuals and families fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, and/or human trafficking be prioritized along with others experiencing homeless as defined by 24 CFR 91.5. Currently only 24 CFR 91.5 paragraphs (1), (2) and (3) are included in the plan, but the full definition of Homeless in 24 CFR 91.5 includes victims/survivors in paragraph (4). Given the unique link between sexual violence and housing instability, MNCASA strongly encourages the inclusion of the full definition of Homeless, including victims/survivors of sexual violence, in the priority populations for this plan.

Citations:

[https://www.nsvrc.org/sites/default/files/2020-12/Whatarethelinks\\_Final508.pdf](https://www.nsvrc.org/sites/default/files/2020-12/Whatarethelinks_Final508.pdf)

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5438753/>

[http://resourcesharingproject.org/wp-content/uploads/2021/11/SASP-Shelter and Sexual Violence 0.pdf](http://resourcesharingproject.org/wp-content/uploads/2021/11/SASP-Shelter_and_Sexual_Violence_0.pdf)

In Community,

The Minnesota Coalition Against Sexual Assault

**161 Saint Anthony Avenue  
Suite 1001  
Saint Paul, Minnesota 55103**

**[www.mncasa.org](http://www.mncasa.org)  
651-209-9999  
[info@mncasa.org](mailto:info@mncasa.org)**

---

**From:**  
**Sent:**  
**To:** MN\_MHFA\_HOME-ARP  
**Subject:** Public Comments

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- 
- 1 Affordable housing development, particularly for persons with the lowest income is indeed the highest need in rural and tribal areas of Minnesota.
  - 2 Emergency Shelter construction, rehabilitation, and operations funding are critical needs in rural and tribal areas.
  - 3 The need for State of Minnesota funding for Coordinated Entry System (CES) infrastructure (priority list management, assessors, and housing navigators) was identified as a high need by Continuum of Care leadership and other organizations that were consulted for this plan, but was never mentioned in this report. State agencies required the development of Coordinated Entry Systems and many still require that homeless persons who want to access state-funded homeless programs go through Coordinated Entry. No state funds have ever been allocated to CES priority list management or participant assessment. Very few state resources support housing navigation. This need should be reflected in the the HOME-APR Plan and CES administration should be an eligible use for HOME-ARP social service funds.

## G. Public Comment Notice: Second Round

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**From:** Minnesota Housing <[MNHousing@public.govdelivery.com](mailto:MNHousing@public.govdelivery.com)>  
**Sent:** Thursday, May 25, 2023 2:27 PM  
**To:** Ganani, Rachel (MHFA) <[Rachel.Ganani@state.mn.us](mailto:Rachel.Ganani@state.mn.us)>  
**Subject:** Notice of Second Public Comment Period: HOME ARP Draft Allocation Plan

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**Minnesota Housing eNews**

May 25, 2023

### **Notice of Second Public Comment Period: HOME American Rescue Plan Draft Allocation Plan**

Minnesota Housing prepared a HOME American Rescue Plan (ARP) Draft Allocation Plan based on feedback from meetings with community members, an online survey and a public hearing.

The Draft Allocation Plan describes how HOME ARP funds will be distributed, including how the funds will address the needs of [qualifying populations](#).

Starting today, you can review the [Draft Allocation Plan](#) and send us your written comments. Written comments must be received by Friday, June 9, at 5 p.m. (Central time).

You can submit feedback by:

- **Email:** [MHFA.HOME-ARP@state.mn.us](mailto:MHFA.HOME-ARP@state.mn.us), include “HOME ARP Draft Allocation Plan” in the subject line
- **Mail:** Minnesota Housing  
HOME ARP Draft Allocation Plan  
400 Wabasha St. N., Suite 400  
St. Paul, MN 55102

### **Accommodations for Language or Disability**

If you would like a hard copy of the Draft Allocation Plan or need an accessibility accommodation, email [MHFA.HOME-ARP@state.mn.us](mailto:MHFA.HOME-ARP@state.mn.us).

Si necesita una adaptación de accesibilidad, envíenos un correo electrónico a [MHFA.HOME-ARP@state.mn.us](mailto:MHFA.HOME-ARP@state.mn.us).

Haddii aad u baahan tahay u fududaynta naafada, nagala soo xiriir [MHFA.HOME-ARP@state.mn.us](mailto:MHFA.HOME-ARP@state.mn.us).

Yog tias koj xav tau kev pab kom koj ua tau, tiv tauj peb ntawm tus [MHFA.HOME-ARP@state.mn.us](mailto:MHFA.HOME-ARP@state.mn.us).

### **What happens to the written comments?**

A summary of comments and recommendations and Minnesota Housing’s response to them will be included in the final HOME ARP Allocation Plan and will help finalize the planning document.

Comments received and changes made from the first comment period have been incorporated into the Allocation Plan for this second public comment period.

The final HOME ARP Allocation Plan will be submitted to the U.S. Department of Housing and Urban Development (HUD).

### **What is HOME ARP?**

Authorized by the American Rescue Plan Act of 2021, Minnesota Housing was awarded approximately \$31 million to increase housing stability. The one-time allocation will address the needs of individuals experiencing homelessness or at risk of homelessness. HUD must approve the HOME ARP Allocation Plan before funds can be made available. Based on the results of the allocation plan and HUD’s review,

Minnesota Housing will then prepare an implementation plan that identifies how the funds will be made available for the eligible uses defined by HUD.

### Questions?

To learn more about HOME ARP, [visit the Home ARP webpage](#). You can also contact Rachel Ganani at 651.297.3120.

[www.mnhousing.gov](http://www.mnhousing.gov)

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## H. Public Comments Received: Second Round

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Hello,

As a Housing Support person, who is tasked with housing homeless and nearly homeless folks (those living in substandard conditions or being evicted or not being able to afford the horrendous increase in rent, since lock down ended), I am writing with what I would hope that the money being put forward is not put into the hands of the landlords, who have done their level best to make it harder for working folks and those on fixed incomes, to even get a toe into the housing/rental market here in Minneapolis. St Paul to a lesser degree, but still, 1050.00/month for folks working full time at minimum is unsustainable, when you factor in utilities, which are more and more being stacked ON TOP of rent, which includes water, heat (for those complexes with boilers) trash, et cetera, instead of building that into the rent. So they expect folks at the bottom (actually they don't, that is the point of the maneuver) to be able to afford the egregious rents, with utilities on top.

And let's not forget the newest stunt, the "Administrative FEE" which is just a bald faced pay to apply scheme, on top of the application fee. Most of these apartment complexes are not WORTH either fee, honestly and folks who have nothing left over are expected to fork over even more they do not have for just the honor of applying for these places.(150.00 and 250.00 just to apply).

I want bigger vouchers, the median income needs to be figured downward for the Metro Area, as it is such a SMALL population that forces the number up, and does not include homeless folks at the bottom, in most instance or figures them disproportionately.

Our clients need money to afford housing, and many are leaving situations of abuse, either by a partner, or by a predatory landlord, and need help, not the endless string of you're not good enough go away, they get on a daily basis by many landlords. Also background checks, I get the necessity, but 60 for a background check, that is abusive as well, as they use their credit histories against them.

A bigger voucher and any property that has currently accepted or previously accepted a Section 42 or other tax rebates should be FORCED to accept vouchers, without background checks on financial/credit histories, that is the point of the voucher, is it not? Given the hoops these folks hop through just to get a place to live, I think the onus needs to be put back onto the landlords/management companies, to come through, since they are making bank on the backs of Minnesotans, it is time they profit LESS and the people profit MORE.

Also, make landlords upkeep the apartments, not let them run down into unhabitable or unsafe/sanitary conditions, just because of the population that lives there, without repercussions to the tenant, but repercussions for the property owners, as it should be. I have several clients who are afraid to say anything is wrong, because they are met with retaliation by managers and management, for their reasonable requests to have things in their units fixed.



I had a client in Minneapolis Housing unit, have their doctor's work order ignored for almost two years, to get their carpet removed, due to lung issue, until I stepped in and got the property manager to get it done. The same client was being bullied by the maintenance man as well. When does this abuse of folks stop?

There needs to be WAY more rental assistance programs and not just with non-profits who are running out of money faster than the need can be met.

The need will only go up at this rate and the monies are not making it down to the folks who can actually benefit from them.

Also, for those living in encampments, stop the rousting of those. These folks don't want to live, in some cases, in an apartment, they want a space to live. The ones that honestly want housing, turn old empty buildings into apartments for them, with leases and rules.

The folks that want to free range, get them land to do so, so they can pitch their tents and live as they want to live.

As for the drugs, they are where they are with that, until they want to be off of the drugs, there is nothing you can do for them to get them to stop. Most of these folks get benefits, usually SSDI, which would pay for housing, if they were not using. These folks need Rep-Payee's who oversee where their money goes, so that they can live in housing and not on the street, if that is their desire. So a mandatory rep payee for drug abusers would be a good first step in that process, in regards to that population.

While money is a good thing and is desperately needed, I think the whole system needs to be looked at and readdressed, and not just bandaid the symptoms, but get to the root of it and fix that. It starts with landlords and rental rates, property values and legislation on the top of the chain, then the bottom will stabilize and the money you pour into the broken system that is housing in Minnesota, can be addressed honestly and with real impact and results.

Thank you,

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Hello,

I support the statement from the Home American Rescue Plan: Allocation Plan that states, "Supportive services to assist households to reach and maintain housing stability are also a crucial need." Unfortunately, some of us support staff are struggling to maintain our own housing stability, because our wages aren't increasing along with the cost of living. Employee morale at our organization is low, employee turnover is high, and this compromises the functioning of the entire organization. I request MN HOME ARP funds go towards higher wages and/or bonuses for all staff that contribute to the important work of getting people housed. We need higher wages we can collectively do a better job for the folks we serve.

Thanks,

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Subject: Metropolitan Interfaith Council on Affordable Housing- MICAHA and Integrated Community Solutions ICS comments on the HOME ARP Draft Allocation Plan

Thank you for opportunity to comment:

Overall, I think it accurately incorporated the excellent data and information you received through your extensive listening sessions and surveys

Specific Comments are in **bold**

1. Affordable Housing: **Please add need for a variety and diversity of housing opportunities from tiny homes to 6-8 bedroom units, manufactured homes, home ownership, intergenerational, shared housing, ADUs , etc. to serve the diversity of people , their wants and needs for affordable housing.**
2. Supportive Services : **Your summary did not clearly spell out the comments to fund " non traditional supportive services" utilizing HUD funds. These Non -HUD typically funded supportive services include culturally diverse family (as defined by the person , friends, elders which many folks in our general society see as there primary support systems .**
3. Tenant Based Rental Assistance (TBRA - MICAHA and ICS **agree with this summary and we have supported TBRA use for over 28 years.**
4. Non-Congregate Shelter- **Needs to be low barrier and 24 hours/ 7 days/week. All year.**
5. Non-Profit Capacity Building- **Agree this is a concern; but no more than 1% of these funds should go to meet this need from these resources.**
6. Affordable Rental Housing and Tenant-Based Rental Assistance are consistently important across all consultation groups, while Supportive Services and Non-Congregate Shelter have more varied levels of importance. **MICAHA and ICS support this statement.**
7. Survey: **While MICAHA and ICS supported and advertised the survey it is important to identify the limitations of the data in your summary. Limitations include: to be able to complete survey you would need to: be able to read at or above 6 grade level (only 46% of American population read at that level) , have access to Internet and know how to use a computer, and have the time to do it, believe their voice would be heard and counted and/or know how to find out about the survey.**
8. Prioritization of HOME ARP Eligible Uses Based on the eligible uses that can be funded in the HOME ARP notice, survey respondents were asked to indicate which two activities Minnesota Housing should prioritize funding. Affordable rental housing was selected as one of the two most important activities in 132 (71%) responses for Minnesota Housing to fund. The second most selected activity was Tenant Based Rental Assistance with 61 (33% responses- **Again MICAHA and ICS support this prioritization**

## Second Round: Public Comment 3

9. The public comment period was held from March 1, 2023 through March 16, 2023. Three comments were received . **MICAH and ICS again appreciates MN Housing outreach with the survey and Listening sessions. Traditional public comments periods do not tend to provide the diversity and/or volume of information that you received through your outreach.**

10. Data utilized: **Please describe the limitations of this data. Homeless data is inaccurate and very archaic due to very limited definition of Homelessness by HUD and lack of statistically based systems utilized ( such as statistical sampling) to count people experiencing homelessness not just people who access the system. Definition does not include people experiencing homelessness utilizing Rapid Re-Housing or Supportive Housing- even though these two systems use up to 75-80% of the HUD Homeless funding every year.**

11. Use of HOME ARP Funding Activities	Funding Amount	Percent of the Grant	Statutory Limit
Development of Affordable Rental Housing	\$27,710,000	89%	
Non-Profit Capacity Building	\$310,000	1%	5%
Administration and Planning	\$3,117,836	10%	15%
Total HOME ARP Allocation	\$31,137,836		

**MICAH and ICS support these allocation amounts, especially in light of, our great MN 2023 Legislative successes in obtaining significant funding for rental assistance and prevention funding( which also provides rental assistance and support services .**

11. Statement of Commitment to Fair Housing: **MICAH and ICS appreciate this statement being included in this document. MICAH and ICS would like you to describe how your allocation plan of these resources specifically meet the goals in Minnesota' current Affirmatively Furthering Fair Housing Plan**

12. Organization List for Consultations and Organization Attendee List for the Public Hearing: **Please include MICAH- Metropolitan Interfaith Council on Affordable Housing. I was representing both MICAH and Integrated Community Solutions at these meetings**

13. 2024-2025 Self-Scoring Worksheet November 2022 Housing Tax Credit and Deferred Projects. **MICAH and ICS have concerns this standard form does not address all concerns and priorities received in the public comment period.**

**Application for Federal Assistance SF-424**

\* 1. Type of Submission:

- Preapplication  
 Application  
 Changed/Corrected Application

\* 2. Type of Application:

- New  
 Continuation  
 Revision

\* If Revision, select appropriate letter(s):

\* Other (Specify):

\* 3. Date Received:

03/24/2023

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

**State Use Only:**

6. Date Received by State:

7. State Application Identifier:

**8. APPLICANT INFORMATION:**

\* a. Legal Name:

Minnesota Housing Finance Agency

\* b. Employer/Taxpayer Identification Number (EIN/TIN):

411599130

\* c. UEI:

KGAPBAMK58L3

**d. Address:**

\* Street1:

400 Wabasha Street North

Street2:

Suite 400

\* City:

St. Paul

County/Parish:

\* State:

MN: Minnesota

Province:

\* Country:

USA: UNITED STATES

\* Zip / Postal Code:

55102-1147

**e. Organizational Unit:**

Department Name:

Division Name:

**f. Name and contact information of person to be contacted on matters involving this application:**

Prefix:

\* First Name:

Rachel

Middle Name:

\* Last Name:

Ganani

Suffix:

Title:

Director of Federal Affairs

Organizational Affiliation:

\* Telephone Number:

651-297-3120

Fax Number:

\* Email:

rachel.ganani@state.mn.us

**Application for Federal Assistance SF-424**

**\* 9. Type of Applicant 1: Select Applicant Type:**

A: State Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

**\* 10. Name of Federal Agency:**

Housing and Urban Development

**11. Catalog of Federal Domestic Assistance Number:**

14.239

CFDA Title:

HOME Investment Partnerships Program (14.239)

**\* 12. Funding Opportunity Number:**

M21-SP270100

\* Title:

HOME-ARP Funding

**13. Competition Identification Number:**

Title:

**14. Areas Affected by Project (Cities, Counties, States, etc.):**

Add Attachment

Delete Attachment

View Attachment

**\* 15. Descriptive Title of Applicant's Project:**

HOME Investment Partnerships American Rescue Plan Funding

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424**

**16. Congressional Districts Of:**

\* a. Applicant

\* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

**17. Proposed Project:**

\* a. Start Date:

\* b. End Date:

**18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="31,137,836.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text"/>
* g. TOTAL	<input type="text" value="31,137,836.00"/>

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- a. This application was made available to the State under the Executive Order 12372 Process for review on
- b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- c. Program is not covered by E.O. 12372.

**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

- Yes
- No

If "Yes", provide explanation and attach

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)**

\*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:  \* First Name:   
Middle Name:   
\* Last Name:   
Suffix:

\* Title:

\* Telephone Number:  Fax Number:

\* Email:

\* Signature of Authorized Representative: 

\* Date Signed:

## ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**


**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee- 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.



9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Deputy Commissioner
APPLICANT ORGANIZATION Minnesota Housing Finance Agency	DATE SUBMITTED 3-23-2023

## ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009  
Expiration Date: 02/28/2025

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.


**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
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11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Deputy Commissioner
APPLICANT ORGANIZATION Minnesota Housing Finance Agency	DATE SUBMITTED 3-23-23

## HOME-ARP CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the participating jurisdiction certifies that:

**Affirmatively Further Fair Housing** --The jurisdiction will affirmatively further fair housing pursuant to 24 CFR 5.151 and 5.152.

**Uniform Relocation Act and Anti-displacement and Relocation Plan** --It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It will comply with the acquisition and relocation requirements contained in the HOME-ARP Notice, including the revised one-for-one replacement requirements. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42, which incorporates the requirements of the HOME-ARP Notice. It will follow its residential anti-displacement and relocation assistance plan in connection with any activity assisted with funding under the HOME-ARP program.

**Anti-Lobbying** --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

**Authority of Jurisdiction** --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations and program requirements.

**Section 3** --It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.

**HOME-ARP Certification** --It will use HOME-ARP funds consistent with Section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2) and the CPD Notice: *Requirements for the Use of Funds in the HOME-American Rescue Plan Program*, as may be amended by HUD, for eligible activities and costs, including the HOME-ARP Notice requirements that activities are consistent with its accepted HOME-ARP allocation plan and that HOME-ARP funds will not be used for prohibited activities or costs, as described in the HOME-ARP Notice.

  
Signature of Authorized Official

3-23-2023  
Date

Deputy Commissioner  
Title