From: Amanda Novak
To: MN_MHFA_PreservationFramework
Subject: Strengthening Asset Management Capacity to Advance Preservation
Date: Thursday, January 29, 2026 2:19:59 PM

As reflected in the Minnesota Housing Preservation Framework, long-term affordability depends not only on access to capital and recapitalization tools, but on the day-to-day stewardship of existing housing. From that lens, I see a clear asset management talent and knowledge gap in the Twin Cities. While there are strong national training opportunities—including excellent offerings through CHAM—locally grounded training, peer learning, and visible career pathways for asset managers remain limited. National programs are invaluable, but they do not always reach emerging talent or fully reflect Minnesota's specific regulatory, funding, and operating environment.

The implications of this gap are significant. Minnesota's preservation goals are increasingly at risk not only from development constraints, but from avoidable portfolio challenges—deferred capital investment, compliance and regulatory risk, missed reinvestment opportunities, and thin succession pipelines within asset management teams. While developers and property managers often benefit from local peer networks and skill-building infrastructure, asset management remains less visible and less clearly defined as a professional pathway at the regional level.

The opportunity I see—building directly on the Preservation Framework—is to strengthen a regional asset management ecosystem that complements national training with shared local standards, practical tools, peer learning, and intentional talent development rooted in Minnesota's realities. Doing so would support organizations like TCHDC, while more importantly advancing the Framework's core objective: ensuring that preserved housing remains financially stable, compliant, and affordable for the long term across the state.

Amanda C. Novak
Executive Director

Twin Cities Housing Development Corporation
1360 Energy Park Drive, Suite 210
St. Paul, MN 55108
651 292-0211 Ext. 222
anovak@tchdc.org

Memo

To: Preservation Framework Team, Minnesota Housing

From: Julia Welle Ayres, Director, Housing Development
Abbie Loosen, Development Manager, Multifamily Housing

Date: February 2, 2026

Re: Hennepin County comment on "DRAFT Preservation Framework for the Targeted Stabilization of Regulated Affordable Housing: Public Comment Period: January 20, 2026, to February 3, 2026"

Minnesota Housing published the DRAFT Preservation Framework on January 20, 2026 to meet the requirements of Minnesota Laws 2025, chapter 32, article 3, section 14, as well as to benefit Minnesota's affordable housing ecosystem. This memo outlines comments and recommendations from Hennepin County's Housing Development department, in consultation with its Housing Stability department. This memo is organized by overall insights, then chapter-by-chapter.

Overall

- The report deserves an "executive summary" - both for lay-people and for the technicians – to understand how everything is inter-related.
- The County recommends the report define ISG 1) more clearly/accurately 2) earlier in the framework (i.e. as a sidebar or footnote) and 3) throughout. Many owners don't know about ISG, and many others have misunderstandings (i.e. that the meat of problem solving happens "at ISG" instead of simply "among funders who also attend ISG", and thus that owners need to bring their problems "to ISG" instead of just "to their funders" as well described elsewhere. For example:
    - ISG is a collaboration of public and private affordable housing funders including representation from the state, counties, cities, the "Housing Funds", Federal Home Loan Bank, the Minnesota branch of the National Association of Housing and Redevelopment Officers, and HUD. The Group is split into "Metro" and "Greater Minnesota" sections. The Group meets monthly to review and update its inventory of regulated affordable housing properties with stress indicators, identify trends across portfolios, regions, or typology, determine where deeper problem-solving is needed, and develop and share best practices in preservation. Projects are added

to, and removed from, the list based on funder identification (typically via notification from the owner). The deeper problem-solving occurs with all relevant funders, together with the owner, but outside of ISG. ISG does not have funding or decisional authority outside of each member's jurisdiction. Trends and policy issues are elevated to the "Super-ISG" for additional analysis.

Chapter 2: Housing Data

- Including statistics on the age of properties and/or their LIHTC commitments would be a helpful indicator of general / ongoing preservation need.

Chapter 3: Diagnostic Workflow Template

- Rename the chapter: "Diagnostic Workflow Overview"
- Before outlining the six steps, note that each is described in great detail in Appendix D. Folks will jump in right away to the work at Step 1, missing excellent context, without this early note.

Chapter 4: Setting Priorities: Considerations for Targeted Stabilization Resources

- "Depth and Durability of Affordability": Add consideration of area market rents. Given area market rents, how much affordability would be lost in the near term without the targeting and restriction?
- "Feasibility and Cost Effectiveness": Depending on the diagnosis, not all interventions will be on the project/property level - some might need to be on the organizational level (i.e. staffing concerns, training concerns, etc). Can this section acknowledge this possibility, and the need to develop collective expertise to build ownership/management capacity?
- "Ownership, Management and Execution Capacity": Add content (or an action) to assess the buyer for feasibility of complying with affordability restrictions and being able to prevent foreclosure? What levers do we have?

Chapter 6: Targeted Stabilization Recommendations

- Paragraph 2, Sentence 2 (Stabilization is rarely achieved…): Add why not (e.g. A single program/funder often cannot afford the full stabilization, but also there is harm in a single entity in a collaboratively funded project acting alone). Developers often "pressure" single funders to solve their problem solo. Adding more "why not" to this sentence supports funders in bringing in other funders, but also reminds funders of the importance of working collaboratively.
- Remove the "Summary" section (or only include the headers). Good place to save on space, and folks will jump into action before getting to the details.

- Throughout, note where the recommendation will help develop or impact stages of the Diagnostic Workflow or determine prioritization for Targeted Stabilization.
- "A: Collaboration and Engagement"
  - A.1: Can we define objective examples / indicators of when the owner should raise concerns? Perhaps using shared early indicators of success?
  - A.4.: Ensure that indicators are easy to collect and monitor (or develop resources to support both).
- "B: Establish Clear Entry Points and Strengthen Coordination"
  - B.1.: Could the RFA automatically include a request to release information and referral to ISG and/or the related funders (including service funders)?
  - B.2.: Broaden from "public funders". Include service funders plus any other subordinate lien holders?
  - B.3:
    - Perhaps either a) also "Develop clear, public-facing information" on extra-ISG cross-jurisdictional problem-solving, or b) we could define that any cross-jurisdictional problem-solving that occurs outside of ISG meetings *IS* ISG (which not describe the current reality), then apply these recommendations and actions to those as well?
    - Regarding "Aligning ISG discussions with funder-specific entry points" and "Develop...information that explains...how property owners bring an issue to public funders attention to advance an issue to ISG": currently, owners bring issues to public funders, then public owners determine whether or not the issue a) needs to include other funders, and/or b) needs to go to ISG. Recommend these bullets points be amended to:
      - Create streamlined referrals and data sharing from the RFA process to relevant funders to support consistent analysis and reduce duplicative information requests to owners.
      - Developing clear, public-facing information that explains: ... How property owners can bring an issue to a public funders attention, and funders' processes to include other funders and/or advance to ISG;
- "C: Strengthen and Coordinate Financial Tools"
  - Add a recommendation to review potential statutory, session law and rule updates to support targeted stabilization, then link to "Chapter 9" as an appendix.
  - C.2.:
    - Would the year-round property funding be similar to Distressed Properties? If yes, could these two implementation actions be combined? With a focus on "long-term stabilization" over "emergency relief"?
    - Would this tool support both capital and operating reserves?

        - Examples of when short-term operating subsidies would be considered would help with scoping and planning.
    - C.5 and C6: Combine these two and focus on comparative lessons to develop a model for an ongoing resource. Could also add other local interventions (e.g. Hennepin County and Ramsey County)
- "D: Align Regulatory, Financing, and Underwriting Tools"
    - D.1: Instead of engaging ISG for multi-funder requests, owners should engage specific funders (with our new entry points and protocol for information-sharing). Using ISG meetings for each request would take more time than available, including from funders not involved on specific projects, and take away from portfolio-level conversations.
    - D.3: Add content (or an action) to assess the buyer for feasibility of complying with affordability restrictions and being able to prevent foreclosure? What levers do we have?
- "E: Support Operations of Permanent Supportive Housing"
    - Paragraph 2 / Sentence 3: Consider this edit: "friction between referral systems, service providers, Housing Authorities, and/or property management"
    - E.1:
        - Add a recommendation to consider coordination with rental assistance funding agencies. "Operating" gets at this but typically operating funding comes via rental assistance.
        - Bullet 1: Assuming "align" doesn't mean "combine", could we further define as something like: underwrite capital operating, and service assumptions at the same time, require adherence to funded assumptions, and ensure that our mechanisms and requirements aren't contradictory?
        - Bullet 2: Important to balance identifying front desk, services, and admin as essential, while also defining them clearly. For example: front desk staffing = 'concierge' / milieu management by the service provider (not security), required only when the building is more than x% supportive housing, and funded by the service provider. Clearly defining these three items will clarify what funding is needed, from which funder, and for which entity.
    - E.3:
        - Bullet 1: could emphasize importance for these activities to be undertaken by the property manager, owner, service provider together to strengthen coordination between parties and ensure both have clear understanding of their projects' regulatory requirements.
        - Add another recommendation similar to F.2.: Strengthening coordination between service providers and property managers.
    - E.4.

        - Pre-amble paragraph 2 (starting “Coordinated Entry”...) is potentially misleading. In most CoCs, CE is not an entity, but is a process/system in which multiple actors participate. While there is typically a CE referral team (or teams) who match the clients of outreach and shelters to the vacancies that housing providers report to them, any ‘interface’ is primarily between outreach and shelter workers and PSH service providers and property managers.
        - Bullet 2: Good to define all of the parties involved in CE, such as: "...including accountability to number of days from request to referral (CE referral team), number of days from referral to move in (service provider/property manager), and portion of tenants complying with the lease (service provider), and allowing providers to fill PSH ... (CE referral team)"
        - Bullet 2: Recommend replacing “appropriate” with an objective term (i.e. ‘no eligible referral under the terms of the PSH service funding ’).
        - Bullet 3: Consider adding economic vacancies in addition to physical.
        - Bullet 4: Consider first identifying and measuring the performance of each as part of the CE process (i.e. shelter/outreach, CE referral team, PSH service providers, property managers, PHAs etc.), then recognizing performance of each of these entities as an operational factor in housing stability. The way this is currently written risks perpetuating misunderstandings of what CE is and obfuscating rather than illuminating where bottlenecks and breakdowns actually occur in the housing process
- “F: Strengthen Asset and Property Management Capacity”
    - F.2.: Considering adding: Encourage or require an asset management reporting tool, such as CSH's PAT, for information sharing amongst teams and measurement against benchmarks.

Chapter 7: Comprehensive Long-Term Preservation

- Note how the Diagnostic Workflow comes into play here.
- Organize the recommendations similar to Chapter 6 for each reference.

Chapter 9: Potential Statutory, Session Law and Rule Updates to Support Targeted Stabilization

- Could this be an appendix referred to in Chapter 6? It’s confusing coming after the Comprehensive Long-Term Preservation and NOAH chapters, and “appendicizing” this content might reinforce that existing programs are our primary focus.

Appendix D: Diagnostic Workflow Template

- Page 71 / Service Providers Section. Service providers are also responsible for timely tenant screening/approval/lease-up.
- 1. Identify and Define the Problem:
    - Add to first key activity: "internal or external safety concerns" and/or "loss of services or rent assistance funding".
- 2. Investigate:
    - Property-level review: also review tenant selection plan and practices, vacancy rate and rent payment trends
    - Financial and ownership review: review proposed and actual operating budgets
    - Regulatory and Funder Commitments: When confirming restrictions and obligations, also confirm whether the commitments are being met (or unnecessarily surpassed).
    - At this stage and each stage thereafter, funders should also ask about the risk of *action* - of committing further staff resource to explore preservation compared with letting the project go.
- 3. Collaborate, Align, and Frame Options
    - In this section, tie people back to prioritization (Chapter 4) and tools (Chapter 5) to guide these decisions.

Appendix E: Targeted Stabilization: Existing Tools

- Could Appendices E and F be combined?
    - In Table 1 and throughout, differentiate between “funding sources/programs” and “tools” (similar to how Appendix F is separate from Appendix E), and use the format of Table 2 (Appendix F) to show where tools and funds can be used for Targeted Stabilization, Comprehensive Long-term Preservation, or both.
- “Tools Administered by Entities Other Than Minnesota Housing”: Consider combining “Local Housing Trust Funds” with “Local and Statewide Affordable Housing Aid”. The programs function generally the same, and also similar to jurisdictions’ HOME, CDBG, and other housing finance sources, and typically have the same “door” to access and learn more about them.
- “Tools Administered Exclusively by Minnesota Housing”: Move “Coordinated Portfolio Review” to “Tools Administered Jointly by Minnesota Housing and Other Entities”?

Closing

Overall, we are grateful for the Agency’s thoughtfulness in compiling this powerful document. Some notes of appreciation:

- This work represents extensive research and engagement and commitment to the goals and requirements of the legislative directive (i.e. organizations, buildings, and people).
- The outlining of the state's history of commitment to preservation plus existing tools, together with national research revealing no "silver bullet", sets a great basis for the "diagnostic workflow" approach to recommendations.
- Distinguishing between "targeted stabilization" and "comprehensive long-term preservation" was elegant and crucial, as was focusing the bulk of recommendations on targeted stabilization where we have so many more levers.
- The overall message is collaborative. This builds on our strengths and points us in the right direction.

Thank you for considering our recommendations. Don't hesitate to reach out with questions to me at julia.welleayres@hennepin.us or 612.543.4342.

Minnesota Housing Finance Agency
400 Wabasha Street North, 400
St. Paul, MN 55102

February 6, 2026

CSH Public Comment on MN Housing's DRAFT Preservation Framework for the Targeted Stabilization of Regulated Affordable Housing

The Corporation for Supportive Housing (CSH) is a national non-profit that advances affordable housing with intensive services to help people with disabilities thrive in their communities.

In dozens of studies across the country over the last 20 years, supportive housing has proven to be an effective intervention that improves housing stability, reduces the use of expensive crisis care, and improves outcomes even for individuals with complex needs. Based on this body of research, the Substance Abuse and Mental Health Services Administration (SAMHSA) has long regarded supportive housing as an evidence-based practice that is "the most potent" intervention to impact housing stability and help people with disabilities and other barriers to housing achieve their desired goals.

The CSH Upper Midwest Regional Office advocates for effective policies and funding, invests in communities through our role as a CDFI, and strengthens the supportive housing field through technical assistance and training in South Dakota, North Dakota, Minnesota, Iowa, and Wisconsin.

CSH appreciates the opportunity to provide comments as MN Housing considers how to respond to preservation needs across the housing continuum.

In 2025, CSH launched a number of supportive housing preservation tools in response to increased operating and preservation needs we were seeing in the sector. These include:

- **Project Assessment Tool (PAT):** This dynamic, Excel-based tool streamlines performance tracking, risk analysis, and decision-making for supportive housing owners, asset managers, and property managers. The Project Assessment Tool can be seamlessly integrated into your current operations reporting to monitor key metrics and financial health. The tool can help you proactively assess risk, identify action steps that support operational stability, and visualize performance through an intuitive dashboard.
- **Operations Clinic:** The CSH Operations Clinic is a hands-on three-day program designed to boost the sustainability and performance of aging supportive housing properties. Teams will gain practical strategies to improve operations, build sustainable practices, and foster tenant stability and success.

- **Housing Preservation Guides on:**
  - How to Access Additional Subsidies for Supportive Housing
  - How to Request Rental and Operating Subsidy Increases
  - Supporting Tenants to Make Timely Rent Payments; and
  - Strategies for Thinking Beyond the Replacement Reserve - A Case Study on Deborah's Place
- **A 3-Part Webinar Series on Navigating Operational Challenges in Supportive Housing**
  - Part 1: From Crisis to Stability
  - Part 2: Diagnosing Property Challenges – Data Collection & Analysis
  - Part 3: Responding to Unhealthy Properties

We will specifically refer to some of the above CSH preservation tools in our public comments, but we also want to highlight that these tools could be valuable to the MN supportive housing community, and we (CSH) welcome their use. My colleagues and I would be happy to answer any questions you may have about the tools or learn about other states/regions that have implemented them.

I also want to note that I am writing in support of the letter submitted by the Minnesota Housing Stability Coalition, of which CSH is a member. The three areas of opportunity highlighted in the Minnesota Housing Stability Coalition letter also align with CSH comments. 1) the need for a greater systemic focus (rather than one-by-one solutions to distress, 2) the need for dedicated funding and capacity at Minnesota Housing to implement the Framework, and 3) the need to better articulate the partnership with affordable housing and supportive housing providers and to include them in the decision-making process.

CSH Recommendations:

1) We appreciate the use of the six-stage Diagnostic Workflow and believe the CSH Project Assessment Tool (PAT) could help providers as they move through the stages – specifically with stage 1-Identify and Define the Problem and 2-Investigate.
   - *Stage 1 Identify the problem:* We think projects may still struggle or it might take them some time to identify problems without having an objective tool to use like the PAT. Many of the larger operators are probably already using a tool similar to the PAT but for smaller operators (<20) they likely haven't invested in a tool.
   - *Stage 2 Investigate:* The PAT could also be helpful in the investigate stage. The number of metrics in the PAT tool dashboard allows a project to drill down to the cause of an issue, not just the symptoms. For example, if a project is reporting significant vacancies there are many reasons why that might be happening. The PAT looks at physical occupancy, economic occupancy, turn rate, days vacant, make-ready days, evictions, and then service delivery, which all impact on vacancy.

Additionally, the Diagnostic Workflow also asks projects to consider some questions. For many of the questions, if the PAT has been used, leadership and staff would have all the information they would need to answer those questions.

2) The CSH Operating Clinic would provide either 6 or 10 projects selected by MN Housing to delve deeper into the data in their PAT tools during an intensive 3-day training program that covers:
    - Supportive Housing Foundations, Understanding Property Types, and Engaging Residents Perspective for Long-Term Property Sustainability
    - Building a Strong Foundation for Property Operations
    - Ensuring Excellence in Asset Management
    - Strengthening and Enhancing Maintenance Practices
    - Increasing Workforce Development for Supportive Services and Property Management Staff
    - Increasing Funding for Supportive Services and Property Management Staff
    - Increasing and Maintaining Rental Revenue
    - Increasing Rent Collection and Reducing High Vacancy Rates
    - Expenses and Addressing Lack of Cash Flow
    - Addressing Financial Concerns – Project Reserves, Financial Indicators, and Addressing Long-Term Capital Needs
    - Finalizing an Action Plan

   The PAT tool provides projects with a risk rating as well as the ability to track their projects data across a 5-year time span, which would also help MN Housing understand areas of need, trends and where to focus funding and capacity building. We have used the PAT tool in Michigan with 10 supportive housing providers, and it provided details that were not previously understood on what the operations challenges actually were – both economic factors and stress in developments.

3) The Supportive Housing Alliance, formerly known as the Stewardship Council, is an interagency working group of housing funders whose purpose is to directly impact the creation, preservation, and stabilization of supportive housing through strategic coordination and policy and administrative changes. CSH currently chairs the Supportive Housing Alliance.

In 2022 the Supportive Housing Alliance undertook a series of engagement sessions with supportive housing providers and tenants to better understand what was working well and what was more challenging in site-based supportive housing. These engagement sessions were the foundation for creating Minnesota-specific Supportive Housing Standards.

We recommend that either MN Housing or the Supportive Housing Alliance reevaluate the standards and update them to reflect current needs in the field and alignment with CSH's updated quality standards and the recently issued AHIC Permanent Supportive Housing Underwriting Guidance. CSH's updated quality standards and the new AHIC guidance are closely aligned, and on February 5th CSH and AHIC co-led a webinar on the new AHIC underwriting guidance for supportive housing. The recording of that webinar will be available online in the coming weeks.

4) We recommend that the following be added to the Preservation Framework and the updated Minnesota – specific Supportive Housing Standards:
    - ***Strengthen Governance & Role Clarity in Supportive Housing***
      Require owners, property managers, and service providers to participate in structured, recurring coordination meetings and adopt clear communication protocols. Add supportive housing-specific role guidance distinguishing the responsibilities of owners, property managers, and service providers.

    - ***Add Supportive Housing-Specific Documentation Requirements***
      Require annual submission of service budgets, staffing schedules, and supportive housing eligibility documentation, with clear assignment of responsibility for maintaining accurate records.

    - ***Establish Minimum PSH Training Requirements***
      Incorporate mandatory training for property management and services staff on supportive housing operations, Housing First, trauma-informed care, de-escalation, Fair Housing, and coordinated entry workflows.

    - ***Create a Standardized Supportive Housing Eviction-Prevention Protocol***
      Include a required, structured eviction-prevention flow with case conferencing, reasonable accommodations, and mandatory property management–services coordination prior to eviction filings.

    - ***Add Screening & Lease-Up Standards***
      Limit overly restrictive screening (e.g., excessive lookback of criminal checks, credit requirements). Require TSPs to match the real-world process and outline clear appeal procedures.

- ***Establish Clear Change-Management Requirements***
  Require partners to notify MN Housing when major operational changes occur (property management, service provider, and subsidy changes). Define an approval pathway and incorporate this into monitoring.

- ***Add Target Population Fidelity Monitoring***
  Ensure supportive housing units annually demonstrate fidelity to intended population targeting, with corrective action triggers if drift occurs.

5) Lastly, we recognize that implementation of the Preservation Framework will take significant staff capacity, and so we recommend MN Housing propose an MOU between industry partners and intergovernmental units on who owns what and how partners will work together and create a public facing dashboard to report on progress and share resources.

Thank you for all the time and effort MN Housing put forward in producing this Framework. This document represents a significant undertaking and does an excellent job capturing the nuance and distinction in different preservation strategies. We are especially pleased to see the focus on permanent supportive housing in the document and are here to support the implementation of it in all the ways we can.

Sincerely,

Amy Stetzel, Director
CSH, Upper Midwest Region
amy.stetzel@csh.org

Strengthening and Scaling Supportive Housing
CSH Industry Survey Results

We must act quickly to address the challenges facing supportive housing providers in order to meet the urgent need for more units.

Research has repeatedly proven that supportive housing works to end homelessness and reduce the unnecessary use of institutional settings. It is a solution centered on providing people with what they actually want (housing + services), which is also a cost-effective and streamlined approach for systems. Yet more than 1 million people who need supportive housing are still living on the streets and in institutions today. **There is an urgent need to preserve and scale supportive housing, but to do so we must also address the significant operational challenges providers are currently facing.**

To better understand these challenges and how supportive housing providers view them, **CSH recently conducted a survey** and received **more than 500 responses from 44 states**, D.C. and Puerto Rico. Nearly 35% of respondents have operated supportive housing for 25 years or more.

Providers have done heroic work to support people in crisis, but increased demand and inconsistent funding have created **significant organizational strain**. Organizations are struggling to hire, retain and provide adequate compensation to staff. Skyrocketing costs for utilities, insurance and other operational costs are shrinking already thin margins and making it difficult to do needed repairs to buildings. Services are underfunded and misaligned, leaving people without the support they need to thrive. **These responses make it clear that we must act quickly to strengthen the supportive housing field.**

This report walks through the challenges that were elevated by respondents and concludes with ideas about solutions. To learn more about the industry survey and share your own ideas, visit www.csh.org/industrysurvey

Industry Survey Results: Supportive Services

Supportive services are critical for quality supportive housing, but lack of funding and coordination means that people struggle to access them.

Services aligned with housing can help people move into and sustain a home of their choice. Unfortunately, **there is not enough funding either for services that support tenants in sustaining housing** or for clinical services such as those for behavioral health. Lack of integrated or even coordinated systems means that people struggle to access the supports that they need when they need them.

In our survey, **approximately 3 out of 4 respondents rated funding for tenancy support services and meeting the increasingly acute service needs of supportive housing tenants as significant challenges**. Each row below shows the % of total respondents who said a given challenge was with very much or somewhat of a challenge for them.

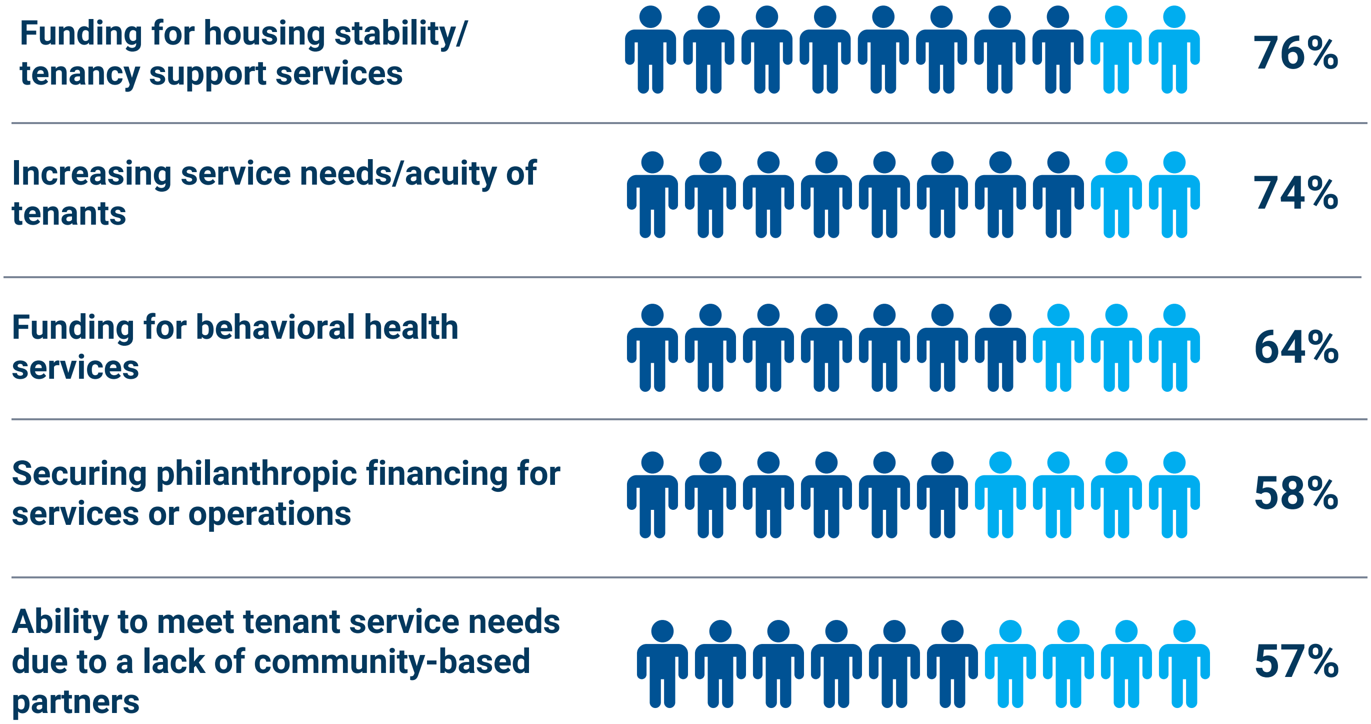
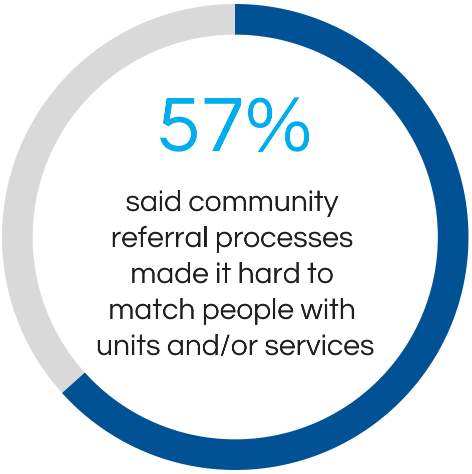


Figure 1: % of respondents rating the topic as a significant challenge, services

Supportive housing providers face significant challenges with both flow into and out of their units.

Community referral processes (often called coordinated entry systems) **can delay rent-up of developments** resulting in increased number of vacant units and related financial losses. Nearly **3 out of 5 respondents said that they faced significant challenges related to how community referral processes** (such as coordinated entry or PHA processes) match of potential clients with available units/services.



While many tenants stay in supportive housing indefinitely, others would like to move on to affordable housing. However, lack of affordable housing in the community can make this nearly impossible. In our survey, **nearly 3 out of 4 respondents called out the inability to move people on to other affordable housing options due to lack of available units** or move-on vouchers in the community as a significant challenge. Nearly 20% said this was one of their top 3 challenges.

Notable Quotes

The coordinated entry system just isn't very coordinated.

Community referral processes, often called coordinated entry systems, **can delay rent-up of developments** resulting in increased number of vacant units and related financial losses. Nearly **3 out of 5 respondents said that they faced significant challenges related to how community referral processes** (such as coordinated entry or public housing authority processes) match of potential clients with available units/services.

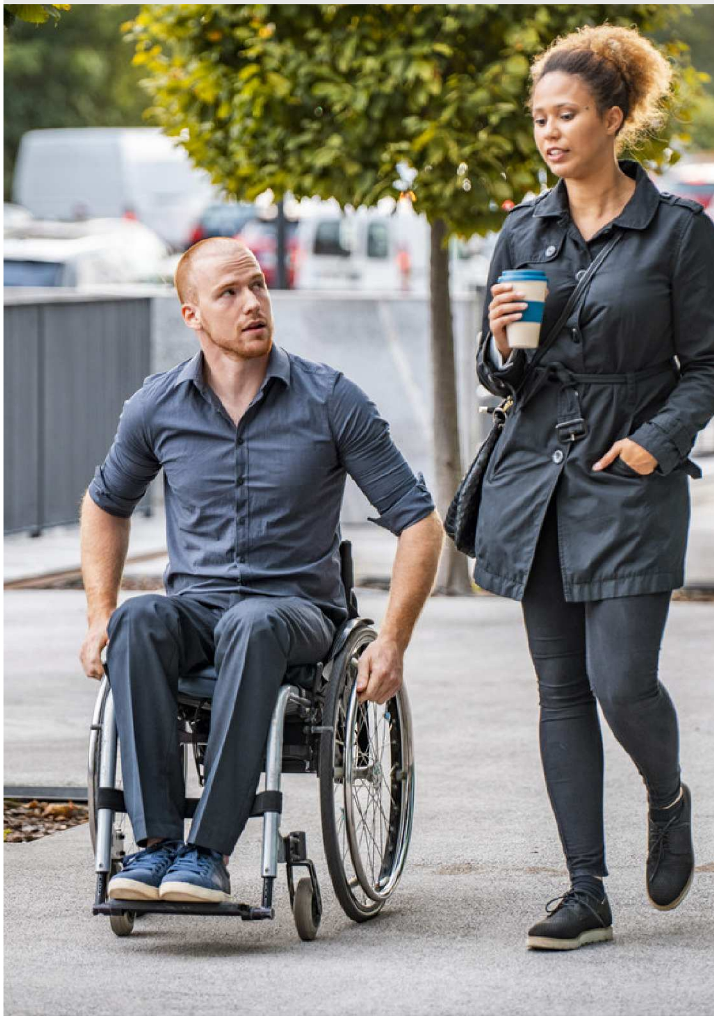
Greater than 50% of respondents also said that these were **significant property related challenges:**

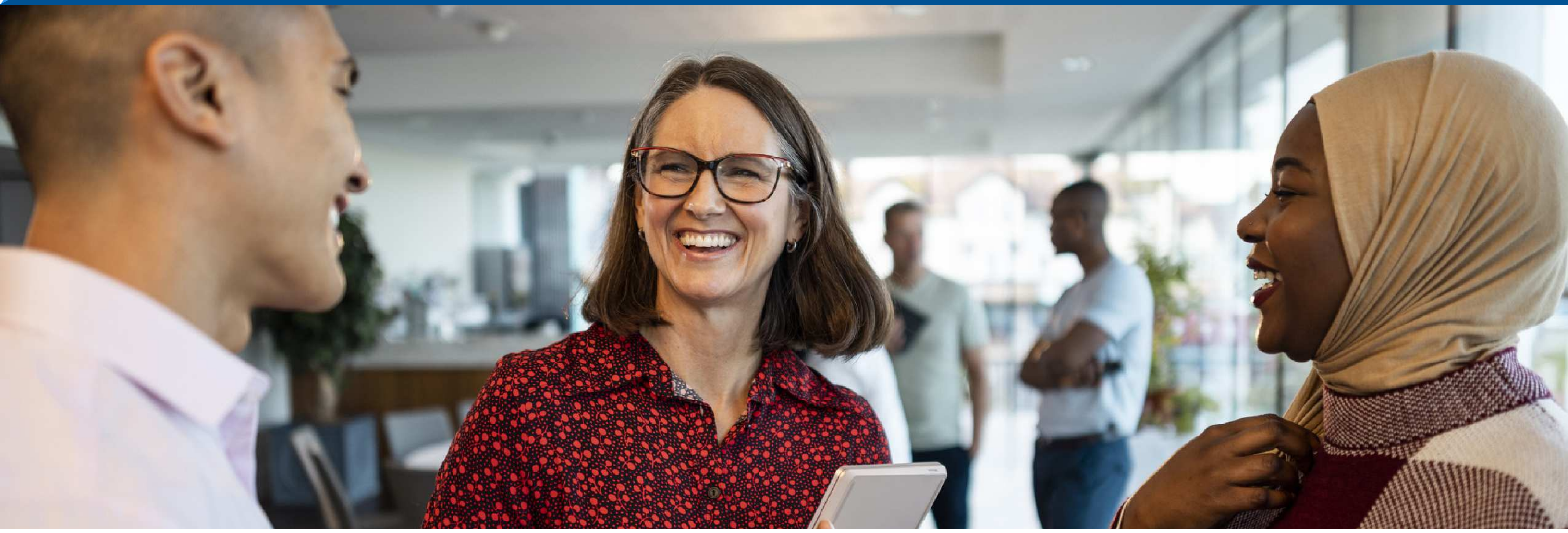
- Funding for operations and/or property management.
- Increases in the cost of utilities
- Funding for necessary repairs or upgrades to aging buildings
- Increasing insurance premiums
- Not enough front desk staff or other safety related support

Notable Quotes

All we want is for our rate to reflect the cost of keeping our Businesses open. Our cost of doing business keeps rising faster than our rate increase. That is not sustainable.

Lack of overall funding for operations and property management, coupled with skyrocketing costs of utilities and insurance premiums, is straining supportive housing providers.





Hiring, retaining and adequately compensating staff is an ongoing challenge.

Insufficient funding across the board for organizations involved in providing supportive housing means that too often **adequate compensation is not prioritized**. The result is that in some cases staff working in supportive housing themselves experience the trauma of economic insecurity.

Staff on the front lines working directly with people living in supportive housing often experience the most significant challenges in remaining in these critical positions. As with much of the nonprofit field, **supportive housing organizations struggle to both hire and retain qualified staff**. The lack of staff retention negatively impacts relationship building with tenants and can lower overall housing quality.

Two-thirds of respondents said that hiring and retaining staff was a significant challenge and nearly two-thirds likewise said that case load numbers were increasing due to staffing or funding constraints.

Notable Quotes

We are asking some of the most challenging folks to receive services from some of the lowest paid workers, which is not new for this world, but it is hard to see.

The supportive housing field is facing significant challenges, but together we can develop and implement solutions.

Our survey results concretely show that **the supportive housing field has been doing too much with too little for far too long**. Any one of these issues alone would cause stress for an organization and the reality is that providers are facing most of them simultaneously. Yet the need to address rising homelessness and housing insecurity grows ever more urgent. **We must act now to shore up and preserve existing supportive housing in order to have the best chance of increasing overall supply.**

CSH is committed to facing the challenges that that must be addressed in order to preserve and scale supportive housing, but we need your help. On this page are a few ideas of potential solutions but we need your help to expand and prioritize them. **Visit www.csh.org/industrysurvey** to let us know **which solutions would be meaningful in your community** or suggest new ones.

- Provide federal matching funds to states to **create flexible housing subsidy pools** for supportive housing
- **Advocate for additional funding** for operations, management, and services.
- Create **emergency financial support** for PSH portfolios to address **insurance premiums.**
- **Raise** or remove **the cap** on **project-based vouchers**
- **Align** federal and state **requirements related to eligibility** for services such as Medicaid
- **Streamline** administrative and reporting **requirements** across funders.
- **Align rates** for supportive services **with true costs.**
- **Transform coordinated entry** so that it quickly connects people to available units and the right level of services.
- Offer matching funds to states that commit to **creating operating reserve funds.**
- **Increase state or local incentives** to landlords who are willing to accept tenants with vouchers.

MINNESOTA
HOUSING STABILITY
COALITION

Minnesota Housing Finance Agency
400 Wabasha Street North, #400
St. Paul, MN 55102
cc: Chair Port, Chair Igo, Chair Howard

February 6, 2026

Dear Minnesota Housing,

On behalf of the Minnesota Housing Stability Coalition, we write to share our feedback on the draft Preservation Framework.

The Framework document represents a significant undertaking and does an excellent job capturing the nuance and distinction in different preservation strategies. It is a meaningful advancement of our shared preservation goals in Minnesota. We also appreciate the significant amount of outreach that the Agency conducted and the opportunity that was provided to our coalition members to contribute ideas and language. Thank you for investing the time to create it and thank you for engaging us as true partners.

We strongly support the idea that this should be a living document that helps the Agency and its partners continue to respond to the needs of the industry as those needs evolve and change. To ensure it continues to evolve, we recommend revisiting and refreshing it on an annual basis in collaboration with industry partners.

Additionally, we strongly support the description on pages 31-32 that delineates the “tactical” ISG and the “strategic” Super ISG, and the importance of cross-funder coordination to address a crisis. Similarly, the Recommendations to Support the Operations of Supportive Housing on pages 41-45 feel responsive and actionable.

In our collective review, we identified three key areas that we hope can be strengthened. Again, we recognize and applaud all the work that went into creating this Framework and the short timeline Minnesota Housing staff was given to complete this first version. We lift up these topics in a spirit of collaboration and partnership, and we hope we can work together to make this even stronger in its next iteration.

<u>Areas to Strengthen the Draft Preservation Framework</u>

We identified three areas where we hope we can add more depth in the next version of the Preservation Framework. These include 1) a greater systemic focus (rather than one-by-one solutions to distress), 2) dedicated funding and capacity at Minnesota Housing to implement the Framework, and 3) better articulation and clarity of the partnership with affordable housing and supportive housing providers. If feasible, we recommend including these in the Executive Summary of this current iteration as well.

1. Need for a greater systemic focus, rather than one-by-one solutions

The Preservation Framework as currently written outlines a specific path for organizations to follow to seek assistance and/or relief when they are in distress. This includes completing a Diagnostic Workflow. Absent from the document is a recognition that the stresses and economic shocks are systemic to the industry; they are not one-offs. And because these shocks are experienced industrywide, the response must be systemic as well. We are looking for the creation of a new set of tools and supports aimed at strengthening the industry as a whole, rather than reviewing properties only on an individual case-by-case basis. We would also like to see the response include raising the alarm around the need for more resources and – in the absence of additional resources – the need to modify the regulatory requirements that can no longer be delivered in a shrinking funding environment.

Additionally, we'd like to see the Framework shift from its current tone that comes across as compliance-oriented (reminding ourselves that the affordable housing industry is already highly regulated and overwhelmingly compliant with those regulations) toward one that acknowledges the Agency's opportunity and responsibility to use all tools at its disposal to mitigate risk and strengthen the industry as a whole. We would like to see the Framework articulate predictable tools, clear processes and realistic underwriting for today's environment, while offering to explore tools that don't currently exist but could be useful in addressing system problems. This is consistent with recommendations made by the year-long Task Force on Long-Term Sustainability of Affordable Housing.

The RFA process can currently take 90-120 days and still result in an unclear decision. While this process and timeline may be appropriate for truly one-off situations with individual properties, it is often too slow to offer meaningful help when urgent stabilization needs arise and inefficient when similar problems are being experienced by many operators. We recommend that Minnesota Housing establish a set of priority categories for stabilization – based on an understanding of the current operating environment – and adapt the RFA process to put systems-level tools to use for entire categories of distressed portfolios. Examples of the types of triggers that would define an emergency that merits rapid response include: sudden operating shortfalls, safety or security crises, loss of a service provider (especially for PSH), and immediate building or systems failures.

Related, we encourage an articulation of the current industrywide shocks in the narrative of the Preservation Framework. It is important that these are acknowledged, as doing so provides the critical context to support the subsequent systems-level needs and solutions. At its best, this Framework could map a path toward deep, creative problem-solving that is undertaken with a spirit of collaboration among all industry partners.

2. Need for dedicated funding and capacity at Minnesota Housing to shepherd and implement the Framework

For the Preservation Framework to be successful, we believe it needs to have dedicated staffing and resources to ensure its implementation. The Agency increased staffing by more than 40 percent in recent years, adding approximately 100 new positions. We would like to see the Preservation Framework have at least one person – and ideally a preservation team – dedicated to ensuring its faithful implementation and revisiting its contents on an annual basis to maintain its relevance with the industry's needs.

In addition to funding the internal staffing capacity to support the implementation of the Framework, ongoing funding sources are needed for targeted stabilization and preservation of nonprofit affordable housing. We applaud recommendation C4 (page 35) to commit ongoing support for publicly owned housing preservation. As stated in this recommendation, public housing is a longstanding and successful program; preserving and protecting this public asset should be a top priority of the Preservation Framework. We believe this is also true of our nonprofit-owned affordable and supportive housing. We recommend a similar commitment to ongoing funding support to address distressed assets within these portfolios, which could be done by strengthening the language in C4 and C5 (pages 35-36).

3. **Articulate the partnership with affordable housing and supportive housing providers and the need to include them in decision-making**

Nonprofit affordable housing and supportive housing providers are key to the success of Minnesota's housing system. Collectively, we partner with state government to implement legislatively-directed public policy goals. Through these partnerships, taxpayer funds are leveraged with private fundraising – thereby stretching the impact of each public dollar. We are also the organizations directly providing homes and critical supportive services to low-income households; as such, we have a keen understanding of our stakeholders and their needs.

The Framework references partners and funders, but does not articulate how these groups will be brought to the table. Since the nature of the partnership will significantly impact the efficacy of the Preservation Framework, we ask for the specific timeframe and roles and responsibilities to be clearly defined.

Specific Recommendations & Feedback:

Beyond these three overarching themes, we collected the following specific feedback from our coalition members:

- We do not believe that another Task Force or Working Group is warranted. Relevant groups composed of industry leaders and resident voices have met over the past two years and provided substantial recommendations. Many other resources and recommendations have been developed in recent years as well. These recommendations are ready to be advanced in a timely manner.
- The framework notes that "disposition should be normalized." We agree and wish to note that disposition need not only be limited to sale. It may also include moving a property out of one program and into another. More guidance on how the Agency views this issue would be helpful.
- We support recommendation E7 on page 44 (and again on page 54) to evaluate QAP scoring, particularly in regards to PSH. We appreciate the Minnesota Housing staff for acknowledging our past requests and being willing to work together to explore sustainable solutions.
- We support the discussion of expanded data collection to better understand the rapidly changing state of the industry. In an ideal world, this data would be collected and tracked by Minnesota Housing as part of its oversight of the industry.
- Strengthening the RFA process is the focus of pages 29-30. While we support these elements, those who have gone through this time-consuming process describe it as a one-way decision process with minimal opportunity to discuss, collaborate, and problem-solve together once the

process formally initiates. If we are going to lean into this as a solution, then we believe the Agency should identify a few key challenges that it has the ability to help solve for the industry, and encourage expedited reviews for buildings that fit those needs. Without that change, housing providers are expending significant staff capacity on an unclear process with no assurance of a meaningful resolution.

- Pages 37-40 relate to regulatory, financing and underwriting tools. This section is important and appreciated because it acknowledges the need to revisit underwriting standards and ensure that they align with current financial realities. We ask for the opportunity to work together to continue to refine these tools to ensure housing developments are set up for sustainable success.
- We appreciate and support the language on pages 49-51 to ensure the protection and well-being of current residents.

Finally, the Coalition is aware that the Minnesota Housing Board of Directors deleted Policy 7 (Meetings) in May of 2024 to end the practice of receiving verbal public testimony during board meetings. We respectfully request that this policy be reinstated. If desired, the Coalition would be happy to offer brief comments and/or answer questions from board members at the February meeting or at any future meeting.

Thank you for your time and consideration.

Respectfully,

Colleen E. G. Ebinger

Colleen Ebinger
Project Manager
Minnesota Housing Stability Coalition

Minnesota Housing
400 Wabasha Street North, Suite 400
St. Paul, MN 55102

Sent VIA EMAIL to: mn.housing@state.mn.us

RE: Preservation Framework Public Comments

Dear Minnesota Housing Finance Agency Team,

On behalf of CommonBond Communities, we would like to thank Minnesota Housing for the significant work invested in the draft *Affordable Housing Preservation Framework*. We believe that this document is an important opportunity for the Agency to signal it's leadership and commitment to create a more coordinated and proactive approach to preserving Minnesota's affordable housing portfolio.

We offer the following high-level comments in the spirit of strengthening the framework and supporting its successful implementation. We believe the framework will be most effective if it clearly supports early intervention, stabilization, and the long-term viability of properties, especially in today's increasingly challenging operating environment. We recommend including and clarifying the following:

- Highlighting predictable and well-defined tools that owners and partners can plan around,
- Communicate clear and transparent processes for requesting and receiving support, and
- Outlining underwriting standards and expectations that reflect today's operating realities.

More specially we offer the following comments:

1. Clarity on how the preservation process will work
Greater clarity on how owners and partners engage with the preservation process and what outcomes can be expected will help owners act earlier and more strategically when challenges arise. We encourage Minnesota Housing to clarify:

- how a property moves from an initial request for assistance to an actual preservation or stabilization outcome,
- what types of decisions and supports can realistically result from the RFA and related processes, and
- what predictable timelines owners should expect for review and decision-making.

2. A clear and fast path for urgent and emergency situations
Not all properties can wait for a lengthy review and planning process. Some situations require

immediate stabilization to protect residents, prevent avoidable loss and protect mission owners from financial harm. We encourage the framework to more clearly distinguish between:

- standard preservation and recapitalization planning, and
- urgent stabilization and emergency situations.

In particular, we recommend clarifying:

- whether a rapid and simplified process will be available for emergencies,
- what types of situations would qualify for that pathway (such as sudden operating shortfalls, safety or security crises, loss of a service provider, or major building system failures), and
- how quickly emergency loans or other stabilization resources can be reviewed and deployed.

3. Predictable tools and flexibility for preservation
Greater clarity about the tools Minnesota Housing expects to use to support preservation and stabilization will help owners and partners make informed financial and operational decisions. We encourage the agency to clarify, at a high level:

- what types of regulatory flexibility may be available,
- how those tools are intended to support long-term affordability and property stability, and
- how owners can plan around these tools rather than relying on case-by-case exceptions.

4. Realistic expectations for financial sustainability
We encourage the framework to clearly describe what a financially stable preserved property looks like in today's environment. At a high level, the framework should acknowledge:

- significant and ongoing increases in insurance, security, staffing, and other operating costs,
- the unique challenges facing older properties and rural properties, and
- the importance of ensuring that preservation investments result in properties that can remain stable over time, not simply address short-term financial gaps.

5. Coordination with partners and funders
Preservation transactions and stabilization efforts routinely depend on multiple public, private, and philanthropic partners. The framework would benefit from additional clarity on:

- How Minnesota Housing intends to convene partners around complex properties.
- How joint problem-solving and shared underwriting or review processes may be supported.
- How local service systems, lenders, and mission-driven investors will be integrated into preservation strategies.

6. Permanent supportive housing stability
We appreciate the attention given to permanent supportive housing in the framework. We encourage Minnesota Housing to further emphasize the importance of stabilizing existing permanent supportive housing as a core part of preservation efforts. At a high level, the framework would be strengthened by:

- clearly recognizing that permanent supportive housing is a higher-cost operating model whether in the site specific or integrated model,
- ensuring that existing permanent supportive housing is fully eligible for preservation and stabilization support, and
- acknowledging the operational challenges that arise when services funding is unavailable, staffing is strained, or resident needs increase.

7. Capacity and partnership, not simply performance
We also encourage Minnesota Housing to frame asset management and owner capacity challenges as system- and resource-based issues, rather than solely as performance shortcomings. In particular, the framework should acknowledge that:

- many nonprofit and rural owners face real limitations in staffing, data systems, and funding, and
- effective preservation will require partnership, shared tools, and appropriately resourced technical assistance.

We are grateful for Minnesota Housing's recognition of the importance of preservation, and for the opportunity to provide feedback during this public comment period. We look forward to continued partnership as this framework is finalized and implemented.

Sincerely,

Heidi Rathmann
Chief Real Estate Officer
CommonBond Communities

Beacon
INTERFAITH HOUSING COLLABORATIVE

Minnesota Housing Finance Agency
400 Wabasha Street North, #400
St. Paul, MN 55102

February 6, 2026

Dear Minnesota Housing,

The Preservation Framework is a transformative step forward that brings essential clarity and historic weight to our collective preservation mission. Beacon Interfaith Housing Collaborative applauds the meticulous efforts of the Minnesota Housing staff to deeply understand and reflect the current preservation landscape reflected in the drafting process. The Agency has successfully captured the intricate nuances and critical distinctions required for a robust preservation strategy. The outreach conducted was both extensive and meaningful, providing a vital platform for stakeholders to contribute.

To ensure this exemplary accomplishment reaches its full transformative potential for Minnesotans, Beacon recommends incorporating the technical feedback and strategic enhancements proposed by the Minnesota Housing Stability Coalition.

In the interest of ensuring the most effective framework possible, Beacon concurs that the next iteration would be significantly strengthened by the following three strategic refinements:

1. Systemic Integration: Transitioning from a case-by-case response to distress toward a more proactive, systemic focus that addresses the root causes of housing instability.
2. Operational Capacity: Ensuring that the Framework is supported by dedicated funding and the internal capacity at Minnesota Housing necessary for successful, long-term implementation.
3. Provider Partnerships: More explicitly articulating the collaborative relationship between the Agency and affordable/supportive housing providers to ensure operational alignment.

Given the importance of these three pillars, I strongly recommend their inclusion in the Executive Summary to provide a clear and comprehensive roadmap for all readers.

We applaud the Agency for the tireless effort invested in this draft. It is a privilege to engage as a partner in this work, and I offer these comments in a spirit of professional collaboration, with the shared goal of making the final iteration of the Preservation Framework an even more powerful tool for our state.

Sincerely,

Benjamin Helvick Anderson

Ben Helvick Anderson
VP of Policy and Organizing
Beacon Interfaith Housing Collaborative

PROJECT FOR PRIDE IN LIVING

1035 East Franklin Avenue
Minneapolis, MN 55404
P (612) 455-5100 **F** (612) 455-5101
www.ppl-inc.org

Minnesota Housing Finance Agency
400 Wabasha Street North, #400
St. Paul, MN 55102

February 6, 2026

Dear Minnesota Housing Leadership Team,

On behalf of Project for Pride in Living (PPL), thank you for the opportunity to review the Affordable Housing Preservation Framework. We greatly appreciate the thoughtful work that informed this draft, including the statewide analysis, grounding principles, and the emphasis on "shared responsibility" across owners, funders, residents, and partners.

As we reflect on the framework, we've identified several opportunities to strengthen its clarity, alignment with current conditions, and usefulness as a sector-wide tool.

1. A stronger acknowledgment of today's system-wide pressures

The past several years has brought unprecedented challenges including historic inflation, rising operating costs, workforce shortages, supply-chain disruptions, insurance volatility, and long-standing funding gaps. These issues are not isolated. They are affecting affordable housing owners and operators across the state and the nation.

While the framework references individual property challenges, it does not fully reflect the systemic nature of the pressures shaping the preservation landscape today. Naming and acknowledging these realities more directly would better align the framework with the conditions owners and funders are navigating and with recommendations outlined in the final report of the Task Force on Long-Term Sustainability of Affordable Housing issued in February 2025.

2. Clearer pathways for true collaborative problem-solving

The framework identifies a broad set of partners but offers limited guidance on how collaboration should function in the context of a system that is under long-term and sustained distress since the onset of the pandemic.

Additional clarity would be valuable around:

- How funders and owners jointly respond to system-wide distress
- How collaborative decision-making is structured
- How communication is coordinated throughout the RFA process and beyond
- How and when regulatory flexibility can be activated

The sector is stronger when collaboration is timely, transparent, and shared across institutions. The preservation framework is an opportunity to formalize and support that approach.

1035 East Franklin Avenue
Minneapolis, MN 55404
P (612) 455-5100 F (612) 455-5101
www.ppl-inc.org

3. A more balanced view of shared accountability

Some components, particularly within the Asset and Property Management Capacity section, place substantial emphasis on owner-specific shortcomings. While organizational capacity is essential, the framing does not fully reflect the sector-wide pressures facing even the strongest operators.

A more balanced approach would acknowledge:

- The widespread economic challenges facing all owners
- The constraints created by existing regulatory and funding structures
- The need for funder responses that align with the root causes of distress

A preservation system rooted in shared accountability will better support long-term stability.

4. An opportunity to shift from procedural to solutions-oriented framing

Many portions of the document such as the Diagnostic Workflow and RFA-related sections read as process-driven rather than adaptive or solution-focused. This can inadvertently limit flexibility at a time when responsiveness and innovation are essential.

A more solutions-oriented framework could emphasize:

- Flexible regulatory pathways
- Real-time collaboration rather than one-directional review
- Recognition of owner expertise
- Trust-based partnerships
- Systemic strategies rather than program-specific prescriptions
- Timely resolution to complex challenges.

Such a framing would better support effective preservation in a rapidly changing environment. Despite these opportunities for refinement, we appreciate that the areas of the draft that offer foundational building blocks, especially in its use of statewide data, its distinction between tactical and strategic components of the ISG, and its thoughtful recommendations related to Permanent Supportive Housing.

We encourage Minnesota Housing to build on this foundation by deepening the emphasis on shared responsibility, elevating the context of systemic challenges, and clarifying structures for collaborative and timely action. These additions would strengthen the framework's ability to meet the challenges we are facing and support the long-term preservation of affordable housing across Minnesota.

PPL remains committed to working alongside Minnesota Housing and our industry partners to ensure residents have stable homes and communities that can thrive. We appreciate your leadership in this effort and welcome the opportunity to discuss our reflections as the framework continues to evolve.

PROJECT FOR PRIDE IN LIVING
1035 East Franklin Avenue
Minneapolis, MN 55404
P (612) 455-5100 F (612) 455-5101
www.ppl-inc.org

Sincerely,

Scott Cordes

Chief Operating Officer
Project for Pride in Living (PPL)

Minnesota Housing Finance Agency
400 Wabasha Street North, #400
St. Paul, MN 55102

February 6, 2026

Dear Minnesota Housing,

I am writing in support of the letter submitted by the Minnesota Housing Stability Coalition with our collective feedback on the draft Preservation Framework.

Specifically, I write in support of the three gaps that were identified: 1) the need for a greater systemic focus (rather than one-by-one solutions to distress, 2) the need for dedicated funding and capacity at Minnesota Housing to implement the Framework, and 3) the need to better articulate the partnership with affordable housing and supportive housing providers and to include them in the decision-making process. We recommend that each of these also be included in the Preservation Framework's Executive Summary.

We agree that this Framework document represents a significant undertaking and does an excellent job capturing the nuance and distinction in different preservation strategies. It is a meaningful advancement of our shared preservation goals in Minnesota. Thank you for investing the time to create it.

Sincerely,

Will Delaney
Co-Executive Director
Hope Community, Inc.

February 6, 2026

James Lehnhoff, Assistant Commissioner Transmitted by email
Minnesota Housing
400 Wabasha Street N
Suite 400
Saint Paul, MN 55102

Re: Comments to the Draft Preservation Framework

Dear Mr. Lehnhoff:

The undersigned legal services organizations submit these comments regarding the Draft Preservation Framework in Minnesota that was released for review by Minnesota Housing on January 20, 2026.

Retain language throughout the draft recognizing the importance of tenants, affordability, and anti-displacement. We support the inclusion throughout the draft of language that recognizes the crucial role that tenants must play in this process and language that centers the tenant experience and affordability and ask that the language be included in the final Preservation Framework.

Pursue additional funding sources for POHP. We support the proposal to explore broadening the sources that support the POHP program. The public ownership requirements of G.O. bond proceeds are incompatible with some of the available HUD repositioning pathways. Allowing properties to access appropriated funds under the POHP program would allow Minnesota Housing to better address the needs of repositioned properties that provide deeply affordable housing.

Strengthen connections with tenants and tenant advocates. The draft recognizes the importance of communication and strengthened relationships with various groups, but much of the systemic relationship building focuses on owners, lenders, public partners, and philanthropy. But it is tenants and tenant advocates who are in the best position to identify a property experiencing distress. Having clear lines of communication and established relationships will help Minnesota Housing and other engaged public entities identify properties in the early stages of distress when there are still multiple preservation options available to stabilize the property.

Protect legally required affordability and occupancy requirements. We appreciate that the draft Preservation Framework recognizes that regulatory modifications can occur only when they are legally permissible. Given the various requirements that are legally required across a number of programs—not just those related to LIHTC LURAs—we recommend that Minnesota Housing establish clear processes for staff to identify and protect those requirements. Moreover, when considering any regulatory modifications, Minnesota Housing is required by its authorizing statute to do so in a manner that protects the long-term affordability of housing.[1]

Affordable housing resources should retain existing required affordability periods. The draft floats the idea of reducing the required affordability period for Challenge (15 years), ARIF (30 years), and HTF (15 years). Public dollars that are invested in privately owned developments must involve binding commitments that affordable housing will be provided in return. An affordability period of as few as 15 years is already too short to meaningfully protect affordable housing resources and Minnesota Housing should consider alternate avenues.

Sincerely,

Housing Justice Center

Mid-Minnesota Legal Aid

HOME Line

Southern Minnesota Regional Legal Services

[1]The agency's authority to consider changes to contract or loan terms must be carried out "in furtherance of the public policies and purposes declared in section 462A.02." Minn. Stat. 462A.04, subd. 1. That section provides as public policy that "public money used for the purposes of this chapter be used in a manner that assures the long-term affordability of housing to low- and moderate-income citizens". Minn. Stat. 462A.02, subd. 11.

From: Michael Dahl
To: MN_MHFA_PreservationFramework
Subject: MHFA Preservation Framework comment
Date: Friday, February 6, 2026 4:59:13 PM

HOME Line submits this comment separately to note that Minnesota Housing should also recognize that tenant-advocacy and tenant-based organizations play a crucial role in the housing infrastructure in Minnesota. Minnesota Housing should consider resources that may be available to provide support to such organizations, such as capacity building or similar funding, to ensure those organizations remain in a position to identify issues at properties, to support tenants as they navigate preservation issues, and to help with the overall goal of preservation of affordable housing for Minnesotans.

--
Michael Dahl *(he, him, his)*
Public Policy Director
HOME Line
office: (612) 255-8865 (direct)
cell: (651) 336-5902

From:	Jessica Kirwin
To:	MN_MHFA_PreservationFramework
Subject:	Public Comment regarding preservation framework
Date:	Thursday, February 5, 2026 4:26:24 PM
Attachments:	image002.png

I would like to comment on page 84 (2. HUD Section 8(bb) Transfers.

I support preservation of existing affordable housing to the extent that it is a viable option in a community, however in the case of an 8(bb) opt out there is not always another property available in the community to transfer the assistance to. In this case it is critical to have an option to develop new housing to accommodate the receipt of the 8bb Project Based Rental Assistance Contract. If the only viable way to preserve the affordable housing in the contract in the community is by developing a property to transfer the assistance to, it would be critical to allow preservation points to be awarded to new construction to preserve affordable housing.

Jessica Kirwin
Executive Director
(320) 208-6559 Office
(320) 585-5144 Fax
Stevens County Housing and Redevelopment Authority (HRA)
100 S. Columbia Ave., Morris, MN, 56267
www.stevenscountyhra.com

From: Deb Mericle <demericle@yahoo.com>
Sent: Thursday, January 29, 2026 4:48 PM
To: MN_MHFA_PreservationFramework
Subject: Maintain housing

Minnesota greatly needs housing resources. But at affordable rates, with quality materials so that after a short time things aren't falling apart and because materials were barely builder grade code there is no warranty. Tenants are told deal with it til it absolutely falls to peices or if you don't like it move. This is on new builds. Tenant turn around is almost monthly and because leases are broke the management company isn't really losing money because they can charge for breaking the lease.
The answer to repairs on a new build should not be duct tape. Management should not tell a tenant they have to have a committee decide if it going to fill a reasonable request for a handicap person to have a grab bar put in the shower. It's the law!
Housing should be someplace a person can live and still keep their dignity!