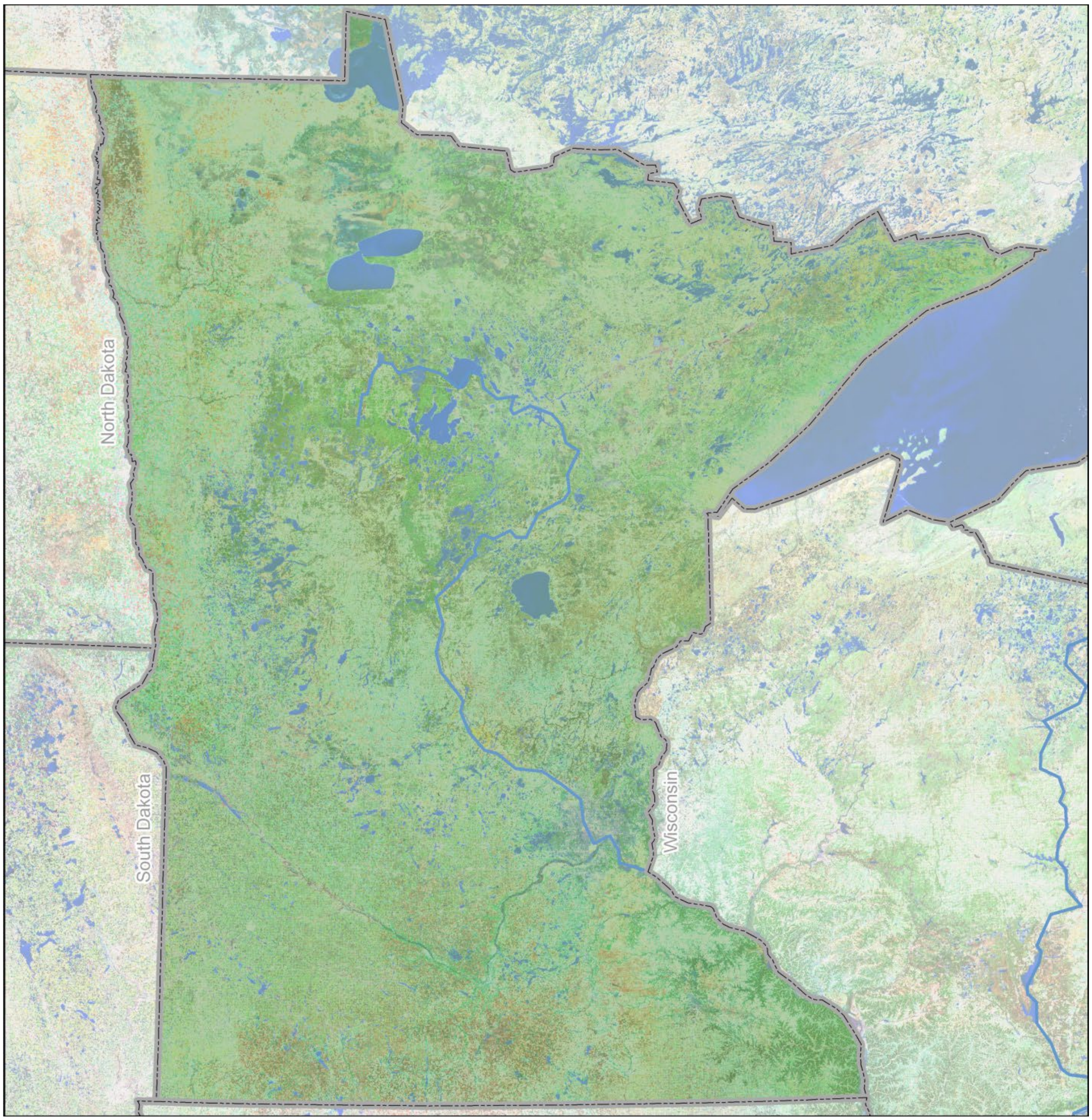
MINNESOTA ANNUAL ACTION PLAN
FOR HOUSING AND COMMUNITY DEVELOPMENT
FINAL – JULY 2026



Executive Summary

AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

The U.S. Department of Housing and Urban Development (HUD) requires consolidated planning, application, reporting, and citizen participation processes, together called the Consolidated Plan, for the following formula grant programs: Community Development Block Grants (CDBG), Home Investment Partnerships Program (HOME), National Housing Trust Fund (NHTF), and Emergency Solutions Grants (ESG). The Consolidated Plan is designed to be a collaborative process whereby a community establishes a unified vision for housing and community development actions. It offers communities the opportunity to shape these housing and community development programs into effective, coordinated housing and community development strategies. It also allows for strategic planning and citizen participation to occur in a comprehensive context, thereby reducing duplication of effort. Guided by the Consolidated Plan, an Annual Action Plan is created to detail the proposed funded activities that will assist housing and community development initiatives throughout the State. As the lead agency for the Consolidated Plan for the State of Minnesota, the Minnesota Department of Employment and Economic Development (DEED), in coordination with the Minnesota Housing Finance Agency (Minnesota Housing), and the Department of Human Services (DHS), hereby follows HUD’s guidelines for citizen and community involvement. Furthermore, these agencies are responsible for overseeing these citizen participation requirements, those that accompany the Consolidated Plan and the CDBG, HOME, NHTF, and ESG programs, as well as those that complement the DEED planning processes already at work in the state.

2. Summarize the objectives and outcomes identified in the Plan

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

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

OMB Control No: 2506-0117 (exp. 09/30/2021)

local government levels, the agencies hope to improve the quality of life for all residents of the state. These strategies are further explained as follows:

- Providing decent housing requires helping homeless persons obtain appropriate housing and assisting those susceptible to homelessness, preserving the affordable housing stock, increasing availability of permanent housing that is affordable to low- and moderate-income persons and increasing the supply of supportive housing.
- Providing a suitable living environment entails improving the safety and livability of neighborhoods, increasing access to quality facilities and services, and reducing the isolation of income groups within an area through integration of low-income housing opportunities.
- Expanding economic opportunities involves creating jobs that are accessible to low- and moderate-income persons, making mortgage financing available for low- and moderate-income persons at reasonable rates, providing credit opportunities for development activities that promote long-term economic and social viability of the community, and empowering low- income persons to achieve economic stability.

3. Evaluation of past performance

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

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

The State's evaluation of its past performance has been completed in a thorough Consolidated Annual Performance and Evaluation Report (CAPER). This document states the objectives and outcomes identified in the first year of the State’s 2022-2026 Consolidated Plan and includes an evaluation of past performance through measurable goals and objectives compared to actual performance. The past year Consolidated Plan and CAPER can be found on the Small Cities Development Program (https://mn.gov/deed/government/financial-assistance/community-funding/small-cities.jsp) and Minnesota Housing (http://www.mnhousing.gov) websites.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

As part of the consolidated planning process, the lead agency must consult with a wide variety of organizations in order to gain understanding of the housing and community development stage. This Annual Action Plan represents a collective effort from a broad array of entities in Minnesota including private, non-profit, and public organizations, non-entitled communities, county governments, Continuum of Care organizations, and various other state agencies. The public participation process included focus groups, outreach committees, and public input sessions.

The public was notified of the availability of the draft Annual Action Plan in the State Register and through our state social media outlets, event agency calendar and eNews listservs, including to organizations that work directly with underserved populations, limited or non-English speaking persons and persons with disabilities. For example, per our Citizen Participation Plan, we reached out to a wide network of councils and coalitions focusing on specific populations, including the Council on Asian Pacific Minnesotans, Central Cultural Chicano, CLUES, Council for Minnesotans of African Heritage, Minnesota Council on Latino Affairs, and the Upper Midwest American Indian Center. In addition, our eNews distribution includes an extensive network of providers for persons with disabilities through the Olmstead Implementation Office currently located at Minnesota Housing. Public comment narratives are included as attachments in Citizens Participation Comments.

Two hybrid (in-person and virtual attendance) public hearings were proposed to provide information on proposed activities and to receive public comments.

5. Summary of public comments

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

Citizen comments received during the second public hearing are listed in the 2026 Annual Action Plan's Comments and Responses in the Unique Appendices.

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

Two comments received not related to programs administered by DEED, MN Housing and DHS were not accepted. The first comment concerned citywide rent control measures and the second addressed the Housing Choice Voucher program. Responses to these comments are included in the 2026 Annual Action Plan's Comments and Responses in the Unique Appendices.

7. Summary

- Provide Decent Affordable Housing - DEED

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

- Enhance Affordable Housing Opportunities - Minnesota Housing

Fund housing activities for low-to-moderate income households, including the rehabilitation and new construction of rental housing using HOME and NHTF funds. In addition to the income priority, Minnesota Housing also prioritizes funding for populations with the highest housing needs. HOME and National Housing Trust Fund funding are permanent supportive housing for "High Priority Homeless" and people with disabilities. High Priority Homeless means (i) households experiencing long-term homeless; (ii) households at significant risk of experiencing long-term homelessness; or (iii) households prioritized for permanent supportive housing by the Coordinated Entry System adopted by the local continuums of care. For persons with disabilities, the limitation or preference will be limited to the population of families (including individuals) with a member whose disability significantly interferes with their ability to obtain and maintain housing. In accordance with the regulatory requirements of HOME and the NHTF, any limitation or preference will not violate nondiscrimination requirements.

- Promote Economic Development - DEED

Encourage robust economic growth through the development and retention of businesses and jobs in non-entitlement (I.e., cities and counties that do not receive funding directly from HUD) areas of the State.

- Facilitate Housing and Service for the Homeless - Minnesota Housing and Department of Human Services

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

- Address Public Facility Needs - DEED

Address community needs through improvements to public facilities and streetscape.

PR-05 Lead & Responsible Agencies - 91.300(b)

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

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

Agency Role	Name	Department/Agency
Lead Agency	MINNESOTA	
CDBG Administrator	MINNESOTA	Department of Employment and Economic Development
HOME/HTF Administrator	MINNESOTA	Minnesota Housing Finance Agency
ESG Administrator	MINNESOTA	Department of Human Services

Table 1 – Responsible Agencies

Narrative

Three state agencies administer HUD Community Planning and Development (CPD) programs, Minnesota Department of Employment and Economic Development, Minnesota Department of Human Services, and the Minnesota Housing Finance Agency.

Consolidated Plan Public Contact Information

Minnesota Department of Employment and Economic Development (DEED) is the lead agency and primary point of public contact on the consolidated plan.

AP-10 Consultation - 91.110, 91.300(b); 91.315(l)

1. Introduction

As part of the consolidated planning process, the lead Agency, DEED, along with Minnesota Housing and DHS, consulted with a wide variety of organizations in order to gain understanding of housing and community development needs.

Provide a concise summary of the state's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies

This plan, as part of the 2022-2026 Consolidated Plan, represents a collective effort from a broad array of entities in Minnesota, ranging from advocacy groups for people with disabilities to economic development organizations. Private, nonprofit, and public organizations, including mayors, county supervisors, county commissioners, county managers, planning and development district administrators, councils of government, persons interested in the CDBG program, persons interested in the HOME or NHTF programs, persons associated with Continuum of Care organizations, and the Minnesota Department of Health were contacted through email correspondence, telephone interviews, virtual meetings, and face-to-face interactions. These persons were solicited to discuss housing and community development needs in Minnesota, including the ranking of those needs and activities that DEED, Minnesota Housing, and DHS might consider to better address needs throughout the state. Further, individuals were asked to provide additional insight into prospective barriers and constraints regarding housing and community development needs in Minnesota.

The State facilitates meetings with agencies and interested parties to discuss existing community needs and to brainstorm funding options to assist communities, creating a roadmap for future projects, specific actions and timelines to achieve these goals.

DEED holds application and implementation training sessions for CDBG grantees including representative from regional development commissions, economic development authority, housing and development authority, consultants, for-profit organizations, community action agencies and units of general local government (UGLG). During these trainings, staff discusses allowable activities based upon the Consolidated and Annual Action Plan. Participants are encouraged to provide their ideas as DEED begins the planning process for the 2026 Annual Action Plan. Refer to the Unique Appendices.

OMB Control No: 2506-0117 (exp. 09/30/2021)

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

Representatives from the Minnesota Interagency Council on Homelessness (MICH) subcommittee on Continuum of Care Planning send representatives to all Continuum of Care regional meetings. As part of the DHS and Minnesota Housing's participation in the MICH, staff are working with CoCs around the state to implement the State's Strategic Plan to address homelessness which includes five goals or "results." These goals focus on Collaboration with impacted communities, homelessness prevention, robust crisis responses, housing options, and health and public health. Each of the goals has strategies and action items to ensure the plan is action oriented.

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

DHS conducts a statewide Request for Proposals which includes ESG funding, and provides an opportunity for each CoC to evaluate, score and provide feedback to DHS staff on the projects requesting funding within their region. Representatives from the Minnesota Interagency Council on Homelessness (MICH) subcommittee on Continuum of Care Planning also send representatives to all Continuum of Care regional meetings. Since April 2020, regular state provider webinars (focused on funding and COVID-response) have included over a hundred participants, including CoC coordinators, homeless providers and persons with lived experience. In addition, in the past two years, State staff from many State agencies (including Department of Human Services) and CoC Coordinators have met in-person at Quarterly Partner Meetings, designed to facilitate communication and information sharing on a variety of topics related to homelessness. Development of HMIS policies and procedures, as well as oversight of HMIS operations and administration, is the shared responsibility of Minnesota state agencies, Continuum of Care regions, local governments, tribal governments, and community-based organizations. This shared responsibility is facilitated through the HMIS Governing Board, consisting of representatives of state government, CoC regions, HMIS end users, Minnesota Tribal Collaborative, and other interested parties, as well as numerous sub-committees which report to the Governing Board.

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

Table 2 – Agencies, groups, organizations who participated

1	**Agency/Group/Organization**	Minnesota Housing
	Agency/Group/Organization Type	Housing Other government - State
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The state recipient of HOME, and NHTF allocates other housing resources for a range of affordable housing activities, supportive housing through homeownership. The agency coordinates the HUD CPD resources with state funding programs and Low-Income Housing Tax Credits.
2	**Agency/Group/Organization**	USDA-Rural Development
	Agency/Group/Organization Type	Housing Other government - Federal
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Minnesota Housing routinely consults with the USDA Rural Development local office to evaluate rental rehabilitation deferred loan projects, as well as homeownership lending activities to identify and address lending gaps in rural areas. Additionally, DEED communicates with USDA Rural Development on public facility projects to potentially assist in addressing funding gaps for critical infrastructure activities. Minnesota Housing, in partnership with USDA RD, continues a special program set aside for the preservation of Section 515 properties in rural Minnesota, utilizing the Rental Rehabilitation Deferred loan program (a state funded program).

OMB Control No: 2506-0117 (exp. 09/30/2021)

3	**Agency/Group/Organization**	Greater MN Housing Fund (GMHF)
	Agency/Group/Organization Type	Housing Regional organization Community Development Financial Institution
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Through regional forums, Minnesota Housing and DEED participate with USDA Rural Development and the Greater Minnesota Housing Fund in gathering community inputs on housing needs across the state, particularly in rural communities. Minnesota Housing partners with GMHF in particular to preserve naturally occurring affordable housing by coordinating with and participating in the NOAH fund.
4	**Agency/Group/Organization**	MN Community Action Association
	Agency/Group/Organization Type	Housing Services - Housing Services-Education Services-Employment Regional organization
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Throughout the year, the umbrella community action group as well as individual community action agencies to coordinate with CAP programs such as housing construction, rehabilitation and assistance, energy assistance, and financial literacy education. Regular consultations with CAP agencies help state agencies direct resources in ways that are consistent with other CAP programming.

OMB Control No: 2506-0117 (exp. 09/30/2021)

5	**Agency/Group/Organization**	Minnesota Department of Corrections
	Agency/Group/Organization Type	Other government - State
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Staff have been meeting with representatives from the Department of Corrections since fall of 2018 to discuss incidents of discharge from correctional facilities that result in homelessness. The initial goal is to develop a shared understanding of the roles and responsibilities of state corrections staff and homeless service providers in regard to Individual's re-entry. The overall goal is to facilitate access to shelter for those who were homeless before entering a correctional facility, and those who have exhausted all other housing and support options.
6	**Agency/Group/Organization**	Minnesota Coalition for the Homeless
	Agency/Group/Organization Type	Housing Planning organization
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy

OMB Control No: 2506-0117 (exp. 09/30/2021)

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Regional Expert Network (REN) is a group sponsored by the Coalition for the Homeless to amplify the voices of persons with lived experience in homelessness policy making. The REN group met with DHS staff in April 2021 to discuss key issues around housing, shelter and economic opportunity facing the communities in which they live (across Minnesota). Specifically, DHS sought suggestions for how to target and prioritize ESG and other state homeless resources (distributed through our April 2021 RFP process) to best meet these emerging needs.
7	**Agency/Group/Organization**	State of Minnesota Department of Employment and Economic Development Office of Broadband Development
	Agency/Group/Organization Type	Other government - State
	What section of the Plan was addressed by Consultation?	Broadband
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Minnesota Office of Broadband Development (OBD) is the state agency dedicated to expanding broadband infrastructure throughout the state. DEED staff routinely meets with OBD staff to discuss actions and programs to provide broadband infrastructure. Programs include the Border-to-Border Broadband Development Program and Low-density Pilot Broadband Development Program which are designed to extend broadband infrastructure to unserved or underserved areas of the State; and the Line Extension Connection Program which is to fund the extension of existing broadband infrastructure to unserved areas such as rural properties. OBD is also implementing the federal Broadband Equity Access and Deployment (BEAD) infrastructure program. OBD lead the facilitation and completion of the statewide digital opportunity plan to connect people to people, people to information and people to resources.
8	**Agency/Group/Organization**	Minnesota Department of Public Safety
	Agency/Group/Organization Type	Other government - State

	What section of the Plan was addressed by Consultation?	Emergency management
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Minnesota Homeland Security and Emergency Management (HSEM) Division of the Department of Public Safety (DPS) comprises of team of experts to help communities recover from disaster. DEED staff meets with HSEM staff on an as needed basis to discuss any historic and potential impacts natural hazards have had on communities. Flooding is a common hazard with high wind events becoming more common. Impacts from natural hazards and disasters appear to be more frequent; however, mitigation efforts have assisted in limiting impacts from flooding. HSEM chairs a committee which meets with other State agencies to coordinate funding and programs to assist communities impacted by disaster events.
9	**Agency/Group/Organization**	Housing Justice Center
	Agency/Group/Organization Type	Housing Services - Housing Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Fair Housing
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Housing Justice Center (HJC) is an organization that addresses fair housing and civil rights and provides legal assistance to ensure housing stability and prevent homelessness. Like with other valued stakeholders, Minnesota Housing frequently meets and consults with HJC throughout the year both on federal matters, such as discussing their priorities for the use of federal funds, and state matters. Regular consultation allows for improved coordination on our shared priorities.

OMB Control No: 2506-0117 (exp. 09/30/2021)

10	**Agency/Group/Organization**	Southern Minnesota Regional Legal Services
	Agency/Group/Organization Type	Housing Services - Housing Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Fair Housing
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Southern Minnesota Regional Legal Services (SMRLS) is a civil legal service organization that addresses fair housing, civil rights and landlord/tenant issues. Additionally, SMRLS focuses on the needs of Southern Minnesota with a specialization on the unique needs of rural Minnesota. Minnesota Housing frequently meets and consults with SMRLS throughout the year both on federal matters, such as discussing their priorities for the use of federal funds, and state matters-for example, SMRLS specializes in assisting agricultural workers throughout the State. Regular consultation allows for improved coordination on our shared priorities.
11	**Agency/Group/Organization**	Mid-Minnesota Legal Aid
	Agency/Group/Organization Type	Housing Services - Housing Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Fair Housing

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Mid-Minnesota Legal Aid (Legal Aid) is a civil legal services organization that addresses fair housing and civil rights and provides legal assistance to ensure housing stability and prevent homelessness. Minnesota Housing frequently meets and consults with Legal Aid throughout the year both on federal matters, such as discussing their priorities for the use of federal funds, and state matters; for example, providing technical assistance on state legislation that sought expanded funding opportunities for cooperatively owned multifamily housing. Regular consultation allows for improved coordination on our shared priorities.
12	**Agency/Group/Organization**	MN NAHRO
	Agency/Group/Organization Type	Housing PHA
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Minnesota Chapter of National Association of Housing and Redevelopment Officials (NAHRO) members include 150 Agency Members and 50 other organizations. Its members own and operate more than 21,000 public housing units across the state. Minnesota Housing consults with NAHRO and individual PHAs around the state on a regular basis to discuss how to make Minnesota Housing's Publicly Owned Housing funds (POHP) more streamlined (See the AP 60 for more info on the POHP program). These meetings identified several improvements including prompting Minnesota Housing to create a more extensive guide for PHAs on how to apply for POHP. Our frequent consultations with PHAs and NAHRO also include providing technical assistance on a regular basis for PHAs who apply for and receive POHP funding. Finally, consultation with PHAs help to identify high priority critical physical needs as well as opportunities to address climate resiliency in public housing. Feedback from the PHAs is sued to determine how to best target funding to meet PHA needs across the state. DEED sponsors the NAHRO conferences to highlight the importance of housing and economic development through outreach efforts of the Small Cities program.
13	**Agency/Group/Organization**	Youth Services Network
	Agency/Group/Organization Type	Services - Housing Services-Children Services-homeless Planning organization
	What section of the Plan was addressed by Consultation?	Homelessness Needs - Unaccompanied youth Homelessness Strategy

OMB Control No: 2506-0117 (exp. 09/30/2021)

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The group is a statewide coalition of youth-serving agencies that coordinated services and advocates with policy makers on behalf of unaccompanied youth and their providers. State Department of Human Services staff regularly consult with this group to inform homeless youth policy.
14	**Agency/Group/Organization**	Minnesota Department of Health
	Agency/Group/Organization Type	Health Agency Other government - State
	What section of the Plan was addressed by Consultation?	Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Staff from the Department of Human Services routinely meet and consult with the state's Infectious Disease response team to assess current outbreaks in emergency shelter or congregate living settings, and to discuss mitigation strategies for shelter and housing settings funded through state shelter capital funds.
15	**Agency/Group/Organization**	Minnesota HMIS Governing Board
	Agency/Group/Organization Type	Planning organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy

OMB Control No: 2506-0117 (exp. 09/30/2021)

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	A member of the Department of Human Services Homelessness, Housing, and Support Services Administration serves as a co-chair of the state's HMIS Governing Board. The Board is comprised of both State funders, Continuum of Care representatives, and persons with lived experience. The Board sets policy and makes funding decisions for the State Homeless Management Information System (HMIS) and oversees the administration of the system by Minnesota's statewide HMIS administrator. This regular participation in HMIS Governance and strategy informs the allocation and uses of ESG funds, reporting and training needs related to outcomes and performance measures, and other key components of the Plan.

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

There are no agency types that are purposely not consulted.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Minnesota Interagency Council on Homelessness	Minnesota has a statewide plan to end homelessness which includes all CoCs in the state. This plan is coordinated by the MICAH, in which staff from 11 state agencies participate. The MN Plan to End Homelessness encompasses all of the affordable housing and suitable living environment goals of the Strategic Plan. In addition, DHS and other state agency staff regularly attend local and regional CoC and FHPAP planning meetings to give and receive input to inform the Strategic Plan.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Olmstead Plan	Olmstead Implementation Office	The Olmstead Plan is a broad series of key activities our state must accomplish to ensure people with disabilities are living, learning, working, and enjoying life in the most integrated setting. The Plan will help achieve a better Minnesota for all Minnesotans, because it will help Minnesotans with disabilities have the opportunity, both now and in the future to live close to family and friends, live more independently, and participate in community life.
Affordable Housing Plan	Minnesota Housing	Minnesota Housing has a suite of planning documents that guide the Agency's work. The four-year Strategic Plan is the overarching document and currently covers 2024 through 2027. The Strategic Plan has 14 strategic objectives, which includes focusing on the people and places most impacted by housing instability, increasing the development of new housing that is affordable, and addressing constraints to homeownership. The Affordable Housing Plan (AHP) is the next plan in the suite, serves as Agency's business plan for implementing the Strategic Plan, covers a two-year period, outlines the resources the Agency expects to be made available over the two years, and outlines key policy, program and operational initiatives. The 2024 - 2025 AHP covered the implementation of the first two years of the 2024-2027 Strategic plan, the 2026 - 2027 Affordable Housing Plan is covering our current implementation.
Analysis of Impediments to Fair Housing	Minnesota Housing	Minnesota adopted a new statewide Analysis of Impediments to fair housing in Fall of 2018, and reports on annual action plan progress in each CAPER.
Small Cities Grantees	DEED	DEED and MN Housing have partnered to co-fund rental preservation projects. Public Facility projects with the highest grant need were funded in partnership with USDA Rural Development, Minnesota Public Facility Authority, MN Dept. of Health, MN Pollution Control, and Department of Energy. DEED conducted eight training/informational sessions to grantees and potential non-entitlement applicants. DEED also encourages grantees and potential applicants to conduct more purposeful outreach to minority populations in their communities to potentially increase these populations in participating in the Small Cities Development Program.

Table 3 - Other local / regional / federal planning efforts

Narrative

DHS works closely with other ESG jurisdictions within the State to ensure consistency and coordination wherever possible. The State periodically meets with local units of government who are also administering ESG funding, providing a venue for close coordination and communication, as well as peer to peer technical assistance. Local jurisdictions also participate in the State's ESG funding review process, and DHS staff provided training to these jurisdictions on best practices in preparing for a HUD on-site monitoring.

During April & May 2021, DHS held special meetings consulting with all 10 CoC Review Committees regarding ESG and other homeless assistance programs distributed through the April 2021 DHS Combined Request for Proposals. These meetings included a range of CoC members, including coordinators, providers, community members and representatives, and persons with lived experience. Similarly, CoC Coordinators and their review committees participated in the review process for the 2023 DHS Combined Request for Proposals. DHS will continue this same process going forward.

Minnesota Housing consults regularly with the Minnesota chapter of the National Association of Housing and Redevelopment Authorities in planning and implementing the state Publicly Owned Housing Program for capital needs funding as described in AP-60.

AP-12 Participation - 91.115, 91.300(c)

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

The Consolidated Planning process has been designed to enumerate Minnesota's overall strategy for coordinating federal and other housing and community development resources to provide decent housing, establish and maintain a suitable living environment, and expand economic opportunities, particularly for low- and moderate-income persons. Interested groups and individuals have also been encouraged to provide input into all aspects of Minnesota's Consolidated Planning activities, from assessing needs to setting priorities through performance evaluation. The public involvement process was initiated with the Citizen Participation Plan (CPP). The objectives of the CPP are to ensure that the citizens of Minnesota, particularly persons of low- and moderate-income, persons living in slum and blight areas, units of local government, housing agencies, and other interested parties, are provided with the opportunity to participate in the planning process and preparation of the Consolidated Plan, including amendments to the Consolidated Plan and the Annual Performance Report. The CPP is attached in admin tab.

The State has aimed to broaden public participation through numerous opportunities for citizens and other interested parties to contribute information, ideas, and opinions about ways to improve Minnesota's neighborhoods, promote housing affordability and enhance the delivery of public services to local residents. These efforts include a broad-based, statewide survey pertaining to Minnesota's housing and community development needs; discussions with agency and community representatives during focus group sessions to address rental, homeowner, and homeless needs; and regional forums held across the state to gather input from Minnesota citizens and interested parties. Other steps the State took to encourage widespread participation in the planning process included publishing notices in a variety of media formats, and direct solicitation of input from community members, program participants, and their interest groups. In general, since the pandemic the State has found that offering virtual options—through the utilization of Teams, WebEx, Zoom, etc.—for citizens to engage has greatly increased participation by citizens.

The State of Minnesota continues to be committed to keeping all interested groups and persons informed of each phase of the Consolidated Planning process and of activities proposed or undertaken under HUD formula grant programs. DEED, Minnesota

Housing, and DHS published the draft Annual Action Plan for public review in a manner that afforded citizens, public agencies, and other interested parties a reasonable opportunity to examine its contents and submit comments. The draft Plan included the amount of assistance the state agencies expect to receive and the activities that may be undertaken, including the estimated amount that will benefit persons of low-and moderate income.

Refer to the Unique Appendices attachment for additional information.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Hearing	Non-targeted/broad community	The first hybrid public hearing was held on Wednesday, March 25, 2026. There were no attendees and no comments were received.	N/A	N/A	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Public Meeting	Non-targeted/broad community	On September 24, 2025, DEED participated at the NAHRO 2025 Fall Conference as an outreach effort for cities, Counties and townships to learn about the Small Cities Development Program. There were approximately 60 attendees.	None	None	
3	Public Meeting	Non-targeted/broad community	DEED provided project-specific guidance throughout 2025, including discussions with non-profit and for-profit organizations, MNDOT, and grantees regarding Environmental Review requirements.	None	None	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4	Public Meeting	Non-targeted/broad community	On May 1, 2025, DEED presented along with USDA RD, PFA, MDH and MPCA at the Minnesota Rural Water Association event as part of an outreach effort to promote the Small Cities Development Program's Public Facility Infrastructure activity. There were approximately 80 attendees.	None	None	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
5	Public Meeting	Non-targeted/broad community	DEED held implementation workshops for the CDBG Small Cities Development Program on September 9, 2025, in Bemidji; September 16, 2025, in Marshall; and September 17, 2025, in St. Augusta. Attendance totaled approximately 55 participants.	Refer to the Unique Appendices	None	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
6	Public Hearing	Non-targeted/broad community	The second hybrid public hearing was held on Wednesday, May 27, 2026. There were ten (10) virtual attendees who provided comments.	Comments received during the public comment period are documented in the Action Plan Comments and Responses, located in the Unique Appendices.	Two comments received not related to programs administered by DEED, MN Housing and DHS were not accepted. The first comment concerned citywide rent control measures and the second addressed the Housing Choice Voucher program.	

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

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

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan $	Narrative Description
			Annual Allocation: $	Program Income: $	Prior Year Resources: $	Total: $		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	18,964,915.00	0.00	8,749,896.27	27,714,811.27	(25,445.00)	Minnesota Department of Employment and Economic Development (DEED)

OMB Control No: 2506-0117 (exp. 09/30/2021)

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan $	Narrative Description
			Annual Allocation: $	Program Income: $	Prior Year Resources: $	Total: $		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	8,100,448.77	2,855,241.57	0.00	10,955,690.34	10,955,690.34	Minnesota Housing (MH) (acquisition, multifamily rental new construction and rehab only)

OMB Control No: 2506-0117 (exp. 09/30/2021)

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan $	Narrative Description
			Annual Allocation: $	Program Income: $	Prior Year Resources: $	Total: $		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	2,145,716.00	0.00	0.00	2,145,716.00	2,145,716.00	Minnesota Department of Human Services (DHS)

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan $	Narrative Description
			Annual Allocation: $	Program Income: $	Prior Year Resources: $	Total: $		
HTF	public - federal	Acquisition Admin and Planning Homebuyer assistance Multifamily rental new construction Multifamily rental rehab New construction for ownership	$3,496,035.12	0.00	0.00	$3,496,035.12	$3,496,035.12	Minnesota Housing (MH) (acquisition, multifamily rental new construction and rehab only)

Table 5 - Expected Resources – Priority Table

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

The CDBG match will be a mix of private, local, and state resources such as loans from local banks, weatherization funds, Minnesota Housing rehabilitation loans. United States Department of Agriculture Rural Development (USDA RD), Public Facilities Authority (PFA), Minnesota Department of Health (MDH), CDBG-Economic Development match is through local initiatives, local banks, owner equity. DEED's CDBG prior year resources include the 15% set-aside for the federal Minnesota Investment Fund program from the previous allocation, which is roughly $2.7 million. The additional funds include reverted grant funds from other small cities grant awards. Larger rehabilitation and construction projects will leverage state/local funding and other federal funds. Smaller project may also leverage other sources such as private, state/local and potentially federal funds. Grantees will retain documentation to show other funding sources have been expended on the project and will be reported annually.

The HOME match requirement is met through tenant-based rental assistance from Minnesota Housing's Bridges program, which provides a rent subsidy for up to five years to persons with mental illness until they can obtain a permanent rent subsidy; and the State Housing Trust Fund program which also provides rental assistance targeted to individuals and families at-risk of homelessness.

The ESG match requirements are met a variety of ways, depending on the level of state resources available to the Department of Human Services in a particular biennial funding cycle. DHS expects that for FFY2026, a portion of the ESG funds will be matched using state Emergency Services Program (ESP) funding (which funds similar services). To ensure compliance with the ESG match requirement, DHS has notified all ESP grantees in the current biennium (whose awards are being used as state-level ESG match) of the prohibition on using those funds to match other federal awards, and of DHS intent to administer these state matching funds in the ways required by ESG regulations. For the remaining FFY2026 ESG funds, subrecipients will identify their own sources of match, and be informed of the regulations governing ESG matching funds.

Minnesota Housing's HOME and NHTF programs leverage other agency, state funded, and low-income housing tax credit investment. Minnesota Housing has an annual Consolidated RFP (Request for Proposal) process which is the agency's largest competitive funding round. It is the primary mechanism that the agency uses to award and allocate federal and state resources to develop and preserve rental homes that are affordable throughout the state of Minnesota. The Consolidated RFP provides a "one stop shop" by consolidating and coordinating multiple housing resources into one multifamily application process. Applicants request funding for a specific housing development and/or activities that meet a specific housing need and generally do not apply for specific programs. The Consolidated RFP deploys significant capital funds and includes federal (including low-income housing tax credits, HOME and NHTF) resources and state appropriated development programs. Minnesota Housing also often has deferred loan and project-based voucher resources available from our Public Funding partners. One of the key benefits of the Consolidated RFP is a consistent application and funding cycle that allows adequate planning time at the community level as well as a streamlined application review process. Minnesota Housing is able to review all applications at once and compare scoring, feasibility and other review considerations across all submittals in order to maximize the number of projects that get funded each year throughout the state.

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

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

Discussion

Note – This Annual Action Plan has been amended to include the National Housing Trust Fund allocation amount to Minnesota Housing, which had not yet been announced prior to original submission of the Plan.

Annual Goals and Objectives

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

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Address Housing Rehabilitation Needs - DEED	2022	2026	Affordable Housing		Retain Decent Housing for LMI Renters/Owners	CDBG: $6,506,192.00	Rental units rehabilitated: 44 Household Housing Unit Homeowner Housing Rehabilitated: 200 Household Housing Unit
2	Increase Affordable Housing Opportunities-MH	2022	2026	Affordable Housing		Unit Production for LMI Renter Households	HOME: $8,351,317.32 HTF: $3,496,035.12	Rental units constructed: 147 Household Housing Unit Rental units rehabilitated: 0 Household Housing Unit
3	Support Economic Development and Workforce Needs	2022	2026	Non-Housing Community Development		Economic Opportunities	CDBG: $1,286,040.00	Facade treatment/business building rehabilitation: 28 Business Jobs created/retained: 0 Jobs Businesses assisted: 0 Businesses Assisted

OMB Control No: 2506-0117 (exp. 09/30/2021)

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Facilitate Housing and Service for the Homeless	2022	2026	Homeless		Homelessness	ESG: $2,145,716.00	Tenant-based rental assistance / Rapid Rehousing: 300 Households Assisted Homeless Person Overnight Shelter: 0 Persons Assisted Homelessness Prevention: 150 Persons Assisted
6	Improve Public Facilities & Infrastructure DEED	2022	2026	Non-Housing Community Development		Public Facilities and Infrastructure	CDBG: $14,011,751.00	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 12,252 Persons Assisted Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 15,757 Households Assisted

Table 6 – Goals Summary

Goal Descriptions

1	**Goal Name**	Address Housing Rehabilitation Needs - DEED
	Goal Description	Provide funding for housing rehabilitation activities for low- to moderate-income homeowner and rental households through CDBG funds, totaling an estimated $6,506,942. The CDBG funding breakdown includes an estimated HUD allocation of $18,964,915, additional funds from prior years totaling $8,749,896.27, bringing the total of available funds to $27,714,811.27.

2	**Goal Name**	Increase Affordable Housing Opportunities-MH
	Goal Description	Fund housing activities for low-to-moderate income rental households, including renovation and new construction, and operating subsidy. The total amount allocated from HUD for HOME is $8,351,317.32 with an additional $2,855,241.57 to be added in program income from the prior fiscal year, for a total of $11,206,558.89. The total amount allocated for HTF is $3,496,035.12. For this goal, total resources amount is $14,702,594.01.
3	**Goal Name**	Support Economic Development and Workforce Needs
	Goal Description	Encourage robust economic growth through commercial building rehabilitation activities, the development and retention of businesses and jobs through CDBG funds totaling an estimated $1,286,040. The CDBG funding breakdown includes an estimated HUD allocation of $18,964,915, additional funds from prior years totaling $8,749,896.27, bringing the total of available funds to $27,714,811.27.
4	**Goal Name**	Facilitate Housing and Service for the Homeless
	Goal Description	Provide funds for service providers to meet the various housing and service needs of the homeless population in Minnesota.
5	**Goal Name**	Improve Public Facilities & Infrastructure DEED
	Goal Description	Address community needs through improvements to public facilities and infrastructure through CDBG funds, totaling an estimated $14,011,751. The CDBG funding breakdown includes an estimated HUD allocation of $18,964,915, additional funds from prior years totaling $8,749,896.27, bringing the total of available funds to $27,714,811.27.

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.215(b)

Through the HOME and NHTF programs, an estimated 147 housing opportunities will be made available to extremely low-, very low-, and low-income families. NHTF assisted units are required to serve extremely low-income households (30% AMI and below). HOME assisted units are required to be occupied by households with low incomes (80% AMI and below), but for projects with more than four HOME units (as is typical for rental projects funded through Minnesota Housing), the requirement is for at least 20% of HOME units to be occupied by households with very low incomes (50% AMI and below).

Over the past several years, Minnesota Housing has been receiving more applications for new construction projects compared to rehabilitation projects. Accordingly, Minnesota Housing's use of HOME and NHTF funds has shifted from smaller per-unit investment amounts to larger per-unit investment amounts in a smaller number of mostly new construction projects. Because of the larger number of applications for new construction projects, Minnesota Housing has been able to focus its HOME and NHTF funds in new construction projects that have larger financing gaps that otherwise would not have moved forward. While this has allowed Minnesota Housing to complete these projects, it has also directly impacted the number of units that have been assisted with HOME and NHTF funds.

AP-25 Allocation Priorities – 91.320(d)

Introduction:

The following section describes the allocation priorities for FY 2026.

Funding Allocation Priorities

	Address Housing Rehabilitation Needs - DEED (%)	Increase Affordable Housing Opportunities-MH (%)	Support Economic Development and Workforce Needs (%)	Facilitate Housing and Service for the Homeless (%)	Provide Funds for Special-Needs Housing & Services (%)	Improve Public Facilities & Infrastructure DEED (%)	Total (%)
CDBG	30	0	6	0	0	64	**100**
HOME	0	100	0	0	0	0	**100**
ESG	0	0	0	100	0	0	**100**
HTF	0	100	0	0	0	0	**100**

Table 7 – Funding Allocation Priorities

Reason for Allocation Priorities

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

CDBG: CDBG spending will be split between addressing housing rehabilitation needs, economic development and public facilities and infrastructure improvements. These spending priorities have been established through the planning process of where the most need is, as well as the capacity to make an impact on those in need in the State of Minnesota. The amount spent on each category is determined both by current application received, past performance and the current ability to meet housing and community development needs in the State. Funds allocated to addressing housing rehabilitation will benefit low- to moderate-income household while improving public facilities and infrastructure will benefit project areas that are predominately low- to moderate-income. Economic Development funds will be utilized to support the Minnesota Investment Fund Program by providing gap financing to businesses creating jobs that benefit low- to moderate-income workers as well as rehabilitation of commercial buildings in small cities' downtowns and commercial areas.

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

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

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

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

For CDBG, the distribution of funds addresses the high needs of low to moderate income households, economic opportunities, and public facilities and infrastructure improvements that can be addressed within the CDBG regulations. These needs impact small or rural cities and counties throughout the State which the loss of one may destabilize a community.

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

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

OMB Control No: 2506-0117 (exp. 09/30/2021)

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

Introduction:

Formula grant funds from the CDBG, HOME, NHTF, and ESG programs may be directed to their highest and best use and anticipated to be successful first, within each set of program guidelines, given the funding of all housing and community development programs throughout Minnesota. Distribution of funds are based allocations provided by HUD. If additional funding is received that exceeds the amount originally provided by HUD, additional funding will be awarded using the Distribution Method noted below or retained to be utilized in the next program year.

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

Distribution Methods

Table 8 - Distribution Methods by State Program

1	**State Program Name:**	DEED: Small Cities Development Program and Economic Development
	Funding Sources:	CDBG

	Describe the state program addressed by the Method of Distribution.	Of the amount available for awards, DEED intends to provide Small Cities Development Program (SCDP) funds in accordance with the following approximate allocations: 30 percent for Single Purpose Applications and 55 percent for Comprehensive Applications. The remaining 15 percent allocation is designated for DEED's federal economic development set-aside. If there is not a need from the unit administering federal economic set-aside funds, these funds will go towards SCDP projects, which would be approved by the Commissioner of DEED. Allocation percentages may be modified by the Commissioner of DEED if it is determined that there is a shortage of fundable applications in any category, as allowed in State Rules. DEED does not distribute funds based on specific geographic area. Applications are competitive in nature. Grant terms are typically 39 months but may longer depending on various factors including but not limited to timing of HUD release of funds and disasters affecting the project area. Method of Distribution calculation: The State subtracts from the annual CDBG Award the amount it sets aside for State Administration ($100,000 + 3% of the CDBG Award (2% for Administration and 1% Administration for Technical Assistance which does not require a state match)) to determine the amount available for CDBG grants. The 1% Administration for Technical Assistance is to support state staff to provide technical assistance to grantees. This includes presenting at workshops on how to apply for and implement CDBG-funded activities and/or onsite technical assistance by state staff to grant recipients on improving some aspect of grant implementation. The State then allocates the amount available for CDBG grants to three categories based on State Rules. That is; 15% for Economic Development Set-Aside, 55% for SCDP Comprehensive Grants, and 30% for SCDP Single Purpose Grants. The Business Finance Unit administers the Economic Development Set-Aside Grant Program and the Community Finance Division administers the SCDP program. No more than 20% of a CDBG allocation can be spent towards general administration. This includes general administration funds expended by DEED along with funds awarded and expended by grantees. Lastly, SCDP funds reverted from grantees who did not spend their total awarded grants in the previous fiscal years would be added to the current year's available funding amount. Grantees

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

	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	Projects are evaluated based on an assessment of need, impact and cost effectiveness of the applicant to complete the project in a timely manner. **<u>SCDP fund evaluation process</u>**: Up to 240 points will be awarded based on evaluation of the proposed project to serve low- and moderate-income persons in relation to housing, public facilities, alleviate slum and blight in commercial areas, and/or address urgent need activities. Up to 210 points will be awarded based on evaluation of need, impact, and capacity for the proposed project. **Up to 30 points will be awarded based on an evaluation of State demographic information.** **Need:** up to 90 points may be awarded for the following: benefit to low- to moderate-income (LMI) persons and project addresses either substandard conditions or pose a threat to the health or safety of the occupants; an inadequate supply of affordable housing for LMI persons; or other documented condition that gives evidence of the need for improvement or additional units to the housing stock serving LMI persons. **Impact:** up to 90 points may be awarded for the following: an evaluation of the extent to which the proposed project will eliminate housing deficiencies or improve public facilities services serving LMI persons and evaluation of administrative capacity to complete the activity in a timely manner. The application must include information documenting an applicant's history in administering prior SCDP funds and/or other programs similar in nature, to determine whether the applicant can complete the proposed activity. Prior SCDP performance will be taken into consideration for future funding. **Cost-Effectiveness:** up to 30 points may be awarded for the following: an evaluation of the extent to which the proposed project will make cost-effective use of grant funds, including consideration with, and use of, funds from other public and private sources. per household benefit is reasonable; and project benefits existing, rather than future, population, unless growth is beyond applicant's control. **State Demographics:** up to 30 points will be awarded based on: the number of poverty-persons and the percentage of persons residing in the area under the applicant's jurisdiction. The per capita

		assessed valuation of the area under the jurisdiction of the applicant, such that points are awarded in inverse relationship to the applicant’s per capita assessed valuation. Economic Development funds: Funds disbursed via the Minnesota Investment Fund (MIF) to support economic development activities are selected based upon potential job creation and retention, project financial viability and community need factors. In more detail, projects are scored based upon the proposed project’s ability to improve local economic stability, unemployment rate, median income ratios, projected job creation & retention, wage and tax base impact, financial feasibility, and public and private investment ratios.
	If only summary criteria were described, how can potential applicants access application manuals or other **state publications describing the application criteria? (CDBG only)**	Selection Criteria for the Minnesota Investment Fund is guided by Minnesota Statutes 116J.8731 which are available on the MN Office of the Revisor of Statutes web page. SCDP application information is available on the State of Minnesota Department of Employment and Economic Development’s Small Cities Development Program website (https://mn.gov/deed/government/financial-assistance/community-funding/small-cities.jsp). DEED provides the complete set of SCDP resources, including applications, checklist, scoring criteria, program guides, and required forms on its website. Applicants may also request materials directly from DEED’s Small Cities Unit team, who offer technical assistance and ensure communities receive the most current documents. In addition, DEED issues a formal Call for Applications, which is publicly posted on the agency’s website to solicit competitive grant proposals. This process ensures that even when only summary criteria are initially shared, potential applicants have clear access to all detailed guidance needed to prepare a complete and competitive SCDP application.

	Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)	Not applicable.
	Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)	Not applicable.

OMB Control No: 2506-0117 (exp. 09/30/2021)

	Describe how resources will be allocated among funding categories.	All funds must be used for economic development related activities undertaken by a Minnesota business. The State allocates the amount available for CDBG grants to three categories based on State Rules. 15% for Economic Development Set-Aside, 55% for SCDP Comprehensive Grants, and 30% for SCDP Single Purpose Grants. The Business Finance Unit administers the Economic Development Set-Aside Grant Program and the Community Finance Unit administers the Small Cities Development Program. No more than 20% of a CDBG allocation can be spent towards general administration. This includes general administration funds expended by DEED along with funds awarded and expended by grantees. The Commissioner of DEED has the authority to approve grants different from the above percentages. CDBG allocates a set of two rounds in funding when circumstances warrant. The first round of funding allocation is the use of reverted funds from past fiscal funding years with priorities for awarded public facility projects and owner-occupied/single-family projects. First round of funding allocation is released in early to mid-July. The second round of funding are new CDBG FY 2026 funding allocations that will be for all remaining awarded projects that are not in the round one funding pool. The release of the FY 2026 funding allocation is released once approval is received from HUD.
	Describe threshold factors and grant size limits.	SCDP funded Single Purpose Applications may only be awarded up to $600,000. Single Purpose Applications are applications that are focus on one housing or community development activity (example: owner-occupied rehabilitation or public facility). Comprehensive Applications may be awarded up to $1,400,000 with each activity not exceeding $600,000. Comprehensive Applications are comprised of two different activities, one of which must be housing (example: owner-occupied housing and commercial building rehabilitation). The maximum MIF grant size is $1,000,000 and is determined by financing need, project leverage capacity and number of jobs to be created or retained.

	What are the outcome measures expected as a result of the method of distribution?	For SCDP projects, outcome measures will include number of assisted housing units, whether owner-occupied or rental, that are rehabilitated, number of commercial buildings rehabilitated in a designated slum/blight area, or number of residents, particularly LMI persons, who benefit from a new or no longer substandard public facility or infrastructure. For MIF project, the measurement will be based on the number of LMI jobs created or retained and private leverage achieved.
2	**State Program Name:**	Minnesota Emergency Solutions Grant Program
	Funding Sources:	ESG
	Describe the state program addressed by the Method of Distribution.	Emergency Solutions Grant Program.

	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	A portion of the FFY2026 ESG funds were awarded through a previous competitive Request for Proposals (RFP). The criteria for that RFP is described below. The remaining amount of FFY2026 ESG funds will be awarded through an upcoming competitive Request for Proposal which has not yet been published but will likely contain similar criteria and selection process. **Organization-wide Approaches (20 points)** Including but not limited to: • Participation in local and regional homeless response system • Experience providing services, or if new provider, preparation to provide services • Best practice approaches • Partnerships with local child welfare providers *(youth programs only)* **Scattered-Site Transitional Housing & Rapid Re-Housing Program Services and Activities (20 points per activity. Applications with multiple activities scored separately.)** • Detailed information about housing model • Clear description of policies and procedures around eligibility, program access/admission, length of stay, involuntary discharge, and rent/utility payments • Description of services provided • Implementation of follow-up and after-care services • Clear plan to serve parents with their children, if applicable • Implementation of harm reduction approaches **Scattered-Site Transitional Housing & Rapid Re-Housing Program Revenue and Budget (10 points per activity.)** • Cost effectiveness of program

		• Detailed information on revenue sources • Diverse and sustainable funding • Descriptive/complete budget narrative and reasonableness of budget
	If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)	Announcement of the Request For Proposals for the ESG program are distributed to all Department of Human Services - HHSSA funded housing agencies, all Continuum of Care committees, all members of the Minnesota Interagency Council on Homelessness, and the Minnesota Coalition for the Homeless. The RFP will be posted on the Minnesota Department of Human Services website and published in the State Register.
	Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)	A portion of the FFY2026 ESG were awarded through a previous competitive Request for Proposals. The remaining amount will be awarded through an upcoming competitive Request for Proposal which has not yet been published. In both instances, eligible applicants include non-profit 501 (c) (3) organizations and local units of government. Many of the non-profits are community and/or faith based. For more detail, see "AP-30 ESG Methods of Distribution" attachment under AP-90 Attachments.
	Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)	Not Applicable.

OMB Control No: 2506-0117 (exp. 09/30/2021)

	Describe how resources will be allocated among funding categories.	ESG funds will be used entirely for prevention and rapid re-housing activities.
	Describe threshold factors and grant size limits.	The State of Minnesota does not have grant limits in awarding ESG funds. However, because DHS attempts to achieve statewide distribution with re-housing funds, sizes of grant awards may be limited by available funds and the number of requests. There are no threshold factors for funding other than those identified in "AP-30 ESG Methods of Distribution" attachment under AP-90 Attachments, which is limited to the timely and complete submission of application materials by the deadline.
	What are the outcome measures expected as a result of the method of distribution?	For the upcoming program year, we anticipate that 450 persons who are either at-risk of, or currently experiencing homelessness, will be moved to permanent housing. By funding a continuum of activities with state and federal ESG funding, we address the needs of persons experiencing homelessness with short or medium-term housing, including prevention (re-housing those at-risk of homelessness) and rapid re-housing (for those already homeless by HUD's definition).

3	**State Program Name:**	Minnesota Housing National Housing Trust Fund (NHTF)
	Funding Sources:	HTF
	Describe the state program addressed by the Method of Distribution.	NHTF funds will be distributed directly to owner/developers of affordable housing via Minnesota Housing's annual Multifamily Consolidated RFP. The Consolidated RFP is offered once per year and provides a means of "one stop shopping" by consolidating and coordinating multiple housing funding resources into one multifamily application process to maximize selections and efficiently allocate funds to the project with the best fit. Applicants request funding for a specific housing development proposal and generally do not apply for specific funding sources. The NHTF funds will be part of a deferred pool of resources, through Minnesota Housing, which are targeted to address specific and critical needs in rental housing markets, including but not limited to geographic priority areas: transit-oriented development, areas with strong job markets or job growth, areas that need more affordable housing, and tribal areas. Assistance will generally be in the form of a zero percent interest rate, 30-year deferred loan due and payable at the end of the term. Minnesota Housing provides the loans directly to the owners. Minnesota Housing retains the option to offer funds on a pipeline basis in the event qualified proposals are insufficient to use the entire NHTF grant.

	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	Applications must meet eligibility requirements and the project will be reviewed in accordance with the Multifamily RFP standards. Which can be found online here https://www.mnhousing.gov/rental-housing/housing-development-and-capital-programs/rfps/consolidated-rfp-htc.html
		
		The needs of very low-income renters, those with incomes below 50% of area median income (AMI), are a high priority for the State of Minnesota, with significant priority on extremely low income renters (below 30% AMI). Applications will be evaluated in accordance with need and scoring criteria that emphasizes other State priorities. For the 2024 consolidated RFP, these strategic priorities include:
		
		1. Preservation of developments that contain existing federal assistance or other critical affordable units at risk of loss,
		
		2. Address specific and critical rental housing needs, for example, serving the lowest income tenants, workforce housing, senior housing, housing for persons with disabilities, increasing opportunities for affordable housing in communities, and
		
		3. Prevent and end homelessness, including through permanent supportive housing.
		
		These priorities may change slightly from year to year. Minnesota Housing also gives priority in awarding funding to the proposals that best meet selection priorities in effect at the time of the RFP. These selection priorities are provided with each Consolidated RFP process, which can be found online and attached in the appendix.
		
		In general, NHTF projects should meet the categories listed below to be eligible for funding:
		
		• Eligible Housing Types:
		  • Permanent general occupancy rental housing
		  • Senior housing
		  • Permanent supportive housing
		
		• Eligible Projects:

		- Have a minimum of four units
		- Eligible Activities:
		  - New Construction
		  - Rehabilitation or preservation
		  - Construction financing
		  - Permanent financing
		  - Operating assistance, if eligible for NHTF
		- Funding and application review requirements include, but are not limited to:
		  - Project feasibility
		  - Financial and organizational capacity
		  - Strategic priorities and selection criteria
		  - Deferred loan funding priorities
		  - Underwriting standards
		  - Payment standards
		  - Rent and income limits
		  - Multifamily design standards
		  - Site control
		  - Prevailing wage
		  - Tenant Selection Plan (TSP) guidelines
		  - Prohibited tenant preference policy
		  - Tenant relocation
		
		Eligibility criteria are discussed at greater length in the NHTF Program Guide in the appendix.
		
		Consistent with Affirmative Fair Housing Marketing regulations, Minnesota Housing requires that each housing provider carry out an affirmative marketing program to attract prospective buyers or tenants in the housing market area regardless of race, creed, color,

OMB Control No: 2506-0117 (exp. 09/30/2021)

		While rehabilitation is a priority for Minnesota Housing, most funds allocated will likely be used for rental new construction, depending on the types of applications received in response to the consolidated RFP, scoring, funding sources available, and the relative need for new construction or preservation.
	If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)	Not Applicable
	Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)	Not Applicable.
	Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)	Not applicable.

	Describe how resources will be allocated among funding categories.	Minnesota Housing will allocate 10% of its grant to program planning and administration costs; up to one-third for operating cost assistance or funding operating cost assistance reserves; the balance of the grant will provide capital funding for new construction or rehabilitation of NHTF units.
	Describe threshold factors and grant size limits.	Rental applications under the Consolidated RFP must meet the requirements specified in the Multifamily RFP Standards. Recent requirements were that the project had to meet the factors of project feasibility, and the applicant had to meet the factors of organizational capacity. Application processes and eligibility criteria for the 2024 Consolidated RFP and subsequent RFPs may be found at MHFA's website www.mnhousing.gov. There are no limits on assistance amounts other than those established in regulations. Amounts of assistance are sized to specific project needs.
	What are the outcome measures expected as a result of the method of distribution?	Number of rental units rehabilitated and preserved or constructed or provided operating assistance.

4	**State Program Name:**	Minnesota Housing-HOME
	Funding Sources:	HOME
	Describe the state program addressed by the Method of Distribution.	Like NHTF, HOME funds will be distributed directly to owner/developers of affordable housing via Minnesota Housing's annual Multifamily Consolidated RFP. HOME funds will be part of a deferred pool of resources through the Multifamily Consolidated RFP, which is offered once per year and provides a means of "one stop shopping" by consolidating and coordinating multiple housing funding resources into one multifamily application process to maximize selections and efficiently allocate funds to the project with the best fit. Applicants request funding for a specific housing development proposal and generally do not apply for specific funding sources. Assistance will generally be in the form of a zero percent interest rate, 30-year deferred loan due and payable at the end of the term. Minnesota Housing provides the loans directly to the owners.

OMB Control No: 2506-0117 (exp. 09/30/2021)

	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	Applications must meet eligibility requirements and the project will be reviewed in accordance with the Multifamily RFP standards. Which can be found online here https://www.mnhousing.gov/rental-housing/housing-development-and-capital-programs/rfps/consolidated-rfp-htc.html
		
		The needs of very low-income renters, those with incomes below 50% of area median income (AMI), are a high priority for the State of Minnesota, with significant priority on extremely low-income renters (below 30% AMI). Applications will be evaluated in accordance with need and scoring criteria that emphasizes other State priorities. For the 2024 consolidated RFP, these strategic priorities include:
		
		1. Preservation of developments that contain existing federal assistance or other critical affordable units at risk of loss,
		
		2. Address specific and critical rental housing needs, for example, serving the lowest income tenants, workforce housing, senior housing, housing for persons with disabilities, increasing opportunities for affordable housing in communities, and
		
		3. Prevent and end homelessness, including through permanent supportive housing.
		
		These priorities may change slightly from year to year. Minnesota Housing also gives priority in awarding funding to the proposals that best meet selection priorities in effect at the time of the RFP. These selection priorities are provided with each Consolidated RFP process.
		
		In general, HOME projects meet the categories listed below to be eligible for funding:
		
		• Eligible Housing Types:
		  • Permanent general occupancy rental housing
		  • Senior housing
		  • Permanent supportive housing
		• Eligible Projects:
		  • Have a minimum of four units
		• Eligible Activities:

		- New Construction - Rehabilitation or preservation - Construction financing - Permanent financing - Funding and application review requirements include, but are not limited to: - Project feasibility - Financial and organizational capacity - Strategic priorities and selection criteria - Deferred loan funding priorities - Underwriting standards - Payment standards - Rent and income limits - Multifamily design standards - Site control - Prevailing wage - Tenant Selection Plan (TSP) guidelines - Prohibited tenant preference policy - Tenant relocation Eligibility criteria are discussed at greater length in the HOME Program Guide in the appendix. While rehabilitation is a priority for Minnesota Housing, most funds allocated will likely be used for rental new construction, depending on the types of applications received in response to the consolidated RFP, scoring, funding sources available, and the relative need for new construction or preservation.
	If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)	Not Applicable.

	Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)	Not Applicable.
	Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)	Not Applicable.
	Describe how resources will be allocated among funding categories.	Ninety percent of the program funds will be directed towards programs. Up to 10 percent will be used for administration.

	Describe threshold factors and grant size limits.	There are no limits on assistance amounts other than those established in HOME regulations. The amount of assistance is sized to meet project needs. Rental applications under the Multifamily Consolidated RFP must meet the requirements specified in the Multifamily RFP Standards. Recent requirements were that the project had to meet factors of project feasibility, and the applicant had to meet factors of organizational capacity. Application processes and eligibility criteria for the 2024 Consolidated RFP and other RFPs may be found at MHFA's website www.mnhousing.gov.
	What are the outcome measures expected as a result of the method of distribution?	Number of rental units rehabilitated and preserved or constructed.

Discussion: None

AP-35 Projects – (Optional)

Introduction:

As allowable in State Consolidated Plan, projects will be entered after the submission of the 2026 Annual Action Plan.

#	Project Name
	No Projects have been added to this Annual Action Plan

Table 9 – Project Information

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

The allocation priorities outlined in this Annual Action Plan are guided by the Strategic Plan (SP-45), stakeholder engagement, needs assessments, and analysis of community development indicators across the state. Priority was given to activities that address:

- Housing Rehabilitation Needs
- Affordable Housing Opportunities
- Economic Development and Workforce Needs
- Facilitate Housing and Service for the Homeless
- Special Needs Housing & Services
- Improvement of Public Facilities & Infrastructure

The distribution of funds aligns with the Method of Distribution (MOD) by directing resources to local governments and other eligible applicants through competitive and/or formula-based applications, ensuring alignment with the state's strategic goals. This funding strategy ensures that the highest-need areas, communities and populations experiencing housing instability or limited access to public infrastructure, receive critical support.

Obstacles to Addressing Underserved Needs:

Despite strategic prioritization, several obstacles persist, including:

- Limited local capacity to apply for and manage CDBG funding in smaller jurisdictions
- Insufficient matching funds or leverage in high-need areas
- Rising construction and rehabilitation costs due to inflation, supply chain issues and domestic preference requirements
- Limited availability of affordable housing units, especially for extremely low-income

households

To address these challenges, the state continues to provide technical assistance to applicants, streamline application processes, and explore partnerships to expand impact.

AP-40 Section 108 Loan Guarantee – 91.320(k)(1)(ii)

Will the state help non-entitlement units of general local government to apply for Section 108 loan funds?

No

Available Grant Amounts

Not applicable

Acceptance process of applications

Not applicable

AP-45 Community Revitalization Strategies – 91.320(k)(1)(ii)

Will the state allow units of general local government to carry out community revitalization strategies?

No

State's Process and Criteria for approving local government revitalization strategies

Not applicable

AP-50 Geographic Distribution – 91.320(f)

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

Funds are available statewide to eligible entities as allowed by each program.

Geographic Distribution

Target Area	Percentage of Funds

Table 10 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

CDBG funds are available to units of local government that are within non-entitlements areas. Statewide - 100% and Non Entitlement - 100%. HOME and NHTF funds are available statewide.

For funding allocated to the ESG Prevention and Rapid Re-Housing activities, funds will only be awarded to applications from non-ESG entitlement areas of the state.

Discussion

Not Applicable

Affordable Housing

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

Introduction:

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

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	147
Special-Needs	0
Total	147

Table 11 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	147
Rehab of Existing Units	0
Acquisition of Existing Units	0
Total	147

Table 12 - One Year Goals for Affordable Housing by Support Type

Discussion:

With HOME and NHTF combined, it is estimated that the state will support development or rehabilitation of a total 147 units of housing with FY 26 resources.

OMB Control No: 2506-0117 (exp. 09/30/2021)

AP-60 Public Housing - 24 CFR 91.320(j)

Introduction:

The State does not own or manage public housing.

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

The Publicly Owned Housing Program (POHP) is a competitive funding program that has historically used the proceeds of General Obligation Bonds (GO) to provide financing to public housing authorities and agencies (PHAs). PHAs use these loans to rehabilitate and preserve public housing in the state. During the 2023 Legislative Session, the State Legislature approved approximately $41 million in general obligations bond proceeds, $40 million in general fund appropriations for public housing rehabilitation and $5 million specifically for Minneapolis PHA and in 2025 the Legislature authorized $26 million is GO bonds. In two RFPs, the Agency has committed over $92.9 million of the authorizations, impacting 50 developments and over 4,800 units. Another RFP is anticipated in 2027 for the remaining authorized resources.

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

The State does not own or manage public housing and, therefore, has no opportunities to access public housing tenants and has no actions planned.

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

While the state does not operate any public housing authority, it does offer resources that may benefit troubled public housing authorities. The Publicly Owned Housing Program (POHP) is a state competitive funding program that uses the proceeds of General Obligation Bonds (GO) to provide financing to public housing authorities and agencies (PHAs). PHAs use these loans to rehabilitate and preserve public housing in the state. Troubled and other PHAs are invited to participate in the "Working Together" conference to receive training on topics relevant to their operations.

Discussion:

Not Applicable

AP-65 Homeless and Other Special Needs Activities – 91.320(h)

Introduction

During FFY2026, the State of Minnesota plans on using ESG funds to address homeless needs throughout the State to help combat the rate of homelessness in the State. These efforts are coordinated through the Continuum of Care and strive to reduce the amount of homelessness in the State.

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

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

The State of Minnesota provides funding to several street outreach, emergency shelters, and transitional housing programs across the state with the state and federal funding that has been made available to it. Some of these programs provide outreach to the unsheltered homeless population but many barriers to effective unsheltered outreach remain. These barriers include but are not limited to: the largely hidden nature of unsheltered homelessness outside of urban centers, large geographic distances and minimal staffing levels at providers, client mistrust of public systems or assistance, and daunting data collection recordkeeping. On-site community meals, support services, or community connect events can provide sources of contact with unsheltered persons and lead to additional services. The State of Minnesota continues to partner with regional Continuum of Care Committees to develop effective and low barrier Coordinated Entry systems in all areas of the state which can better serve as a focal point for assessing and prioritizing the individual needs of both unsheltered and sheltered persons.

Addressing the emergency shelter and transitional housing needs of homeless persons

After many years of minimal state investment in emergency shelter, the 2021 Minnesota Legislature invested a record $6.8M in on-going base funding. Subsequent legislative sessions have increased this investment to over $34.3M per year in base funding for emergency shelter, reflecting the growing recognition of the important safety net provided by Minnesota's emergency shelter providers. Providers have used this increased investment to respond to the growing need for safe and secure shelter while strengthening the existing shelter infrastructure. On a given night, over 5,300 persons are staying in emergency shelters in Minnesota and almost 1,800 persons are staying in transitional housing.

In such communities, youth, and families in particular struggle to exit homelessness or emergency shelter quickly as poor or minimal rental histories, high rents and rental deposits, low wages and other barriers make it difficult to obtain market-rate housing. Site-based transitional housing can provide an interim option for those unable to obtain their own lease (even with rapid-rehousing assistance), particularly in the growing number of Minnesota communities where private rental housing is increasingly unavailable or inaccessible for persons experiencing homelessness. For others, scattered-site transitional or rapid rehousing (funded with ESG and other sources) provides the rental assistance and supportive services that many individuals and families need to obtain and maintain private rental housing.

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

Emergency Solutions Grant Program funds will be targeted to provide prevention and rehousing assistance and services to families, individuals, and youth, some of whom are veterans and some of whom are chronically homeless, to move these households from homelessness to housing. By targeting these funds to persons that currently reside in shelters (or who would be not for this assistance), the length of time these households are homeless will be reduced. With the provision of supportive services to the rapid rehousing participants, it is expected that permanent housing retention will be improved.

In addition to efforts with ESG funding, the State provides over $10.2 million dollars per year in Family Homelessness Prevention and Assistance Program (FHPAP), a funding stream which is dedicated to moving homeless persons to stable housing and preventing persons who are at greatest risk from becoming homeless.

Similar efforts are well underway among state, county and nonprofit providers seeking to end veteran homelessness as part of the State’s Heading Home plan, including maintaining a statewide veteran registry. These efforts have shown results as the numbers of homeless veterans have decreased in recent years, and at least 9 of Minnesota 10 CoC regions have effectively ended veteran homeless (as of October 2025).

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities,

foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

Discharge planning for persons residing in institutions initially occurs through the services provided by that institution, many of whom are legally required to provide discharge planning to residents leaving their facilities. In addition, the State's 10 Continuum of Care planning groups have developed Plans to End Homelessness which address coordination with discharge planning processes, including the development Coordinated Entry systems. As a result, local housing providers provide outreach and assessment to persons who may need supportive housing when leaving an institution. Unfortunately, many persons leaving these institutions are not initially eligible for HUD-funded programs administered through the Continuum of Care if they were not literally homeless upon entry and residing in the institution for 90 days or less. In these cases, discharge referrals are made to other types of supportive housing for which the household may qualify. At the Department of Human Services, the Bridging Benefits project continues to improve access to mainstream and public benefits for persons nearing discharge from the state's correctional system, a key component to reducing housing instability among those recently incarcerated in Minnesota. The Department of Corrections (DOC) published a "Homelessness Mitigation Plan 2022 Legislative Report." This plan was a collaborative effort, led by the DOC, that involved collaborative efforts with many groups ranging from other state agencies to people with lived experience of homelessness.

As noted earlier, in Minnesota the Family Homeless Prevention and Assistance Program (FHPAP) program is funded at over $10.2 million and a significant amount is used for homelessness prevention activities. These funds are available in all 87 Minnesota counties. These resources, as well as the State's Homeless Youth Act funding all assist unaccompanied youth leaving foster care and young parents to become stably housed and avoid homelessness.

Discussion

Not Applicable

Minnesota Housing did not receive a FY2026 HOPWA allocation and will not be receiving HOPWA funds in the future. This is due to dropping case numbers of HIV/AIDS throughout the State. Minnesota Housing will continue to spend down the remainder of its 2024 and 2025 funds through its project sponsor, Clare Housing.

AP-75 Barriers to affordable housing – 91.320(i)

Introduction:

In the 2022 Housing and Community Development Survey, respondents were then asked if they knew of any barriers to the development or preservation of housing in their communities. Respondents most identified community opposition, or "not in my backyard" mentality, as a barrier to the development or preservation of housing. Cost was also a commonly perceived impediment as building materials, fuel, and services continue to become more expensive in the market, with the costs of land, materials, or labor ranking as the highest barriers to the development or preservation of housing. Those who provided additional narrative commentary in response to this question tended to highlight these same concerns, with many calling for outreach and education to address NIMBYism and a range of strategies designed to decrease the costs of providing affordable housing, including redevelopment, updates to zoning codes, and additional funding.

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

Containing the cost of developing affordable housing is a critical issue in Minnesota. To address the growing need for affordable housing, Minnesota Housing must build and preserve as many affordable units as possible with limited resources. Costs of land, materials and labor are outside of what Minnesota Housing can control; however, cost containment is a goal at Minnesota Housing. Costs are evaluated for each project and overall costs of production are also monitored and evaluated over time. At the same time, Minnesota Housing balances cost containment objectives with other policy goals, such as long-term operating costs.

Here are some additional examples of how Minnesota Housing reduces other barriers through our process:

We reduce the barrier of local land use and development policies by prioritizing developments that use land efficiently and minimize the loss of agricultural land and green space,

We reduce barriers of zoning by prioritizing developments that address the needs of the underserved populations of households of color, single-headed households with minor children, and people with disabilities; developments that are in opportunity areas.

We reduce barriers of local application and permit processes by prioritizing developments for which costs are reduced or avoided by regulatory changes, incentives, or waivers by the local governing body, including fast-track permitting and approvals, flexibility in site development standards and zoning requirements, and waiver of permit or impact fees.

Discussion:

Minnesota Housing seeks state resources to help address the costs of affordable housing. A full summary of the 2025 State Legislative Session can be found in the Appendix to this Plan.

AP-85 Other Actions – 91.320(j)

Introduction:

The following sections discuss other actions the state will undertake in FY 2026.

Actions planned to address obstacles to meeting underserved needs

The State has found that the largest obstacle in meeting underserved needs is a lack of funding. The State will continue to fund projects within its scope of funding to serve residents in need in Minnesota and will continue to seek other funding sources to address additional needs in the State.

Actions planned to foster and maintain affordable housing

Minnesota Housing will continue to give selection points in its RFPs to projects that include funding commitments from local units of government. However, Minnesota Housing does not require local consent.

Minnesota Housing will continue to give selection points in its RFPs to projects that include funding commitments from local units of government. However, Minnesota Housing does not require local consent.

The Low-Income Housing Tax Credit Program (LIHTC) and additional state deferred financing are available to owners and investors of affordable rental housing for low-income households to help finance development. Selection points are also awarded for projects for which development-specific assessments or infrastructure costs are donated or waived or that have been approved for reduced setbacks, reduced parking requirements, decreased road widths, flexibility in site development standards and zoning code and other requirements, preservation of affordable housing, water and sewer access charge reductions.

Actions planned to reduce lead-based paint hazards

Exposure to lead-based paint is one of the most significant environmental and public health threats posed to homeowners and renters. Housing units built before 1940 are most likely to contain lead-based paint or coatings. Units built between 1960 and 1978 have a lesser risk in comparison to homes built before 1960. Lead was banned for use in household paint in 1978. In some cases, older units may have few if any lead hazards depending on construction methods, past renovation work, and other factors (HUD grants). CDBG housing rehabilitation

OMB Control No: 2506-0117 (exp. 09/30/2021)

activities require conformance with the Lead Safe Housing Rule at 24 CFR 35.1330.

The Environmental Health Division of MDH oversees a comprehensive lead program that includes state-wide medical monitoring, health care, elevated blood investigations, compliance assistance, compliance assurance, and environmental remediation of identified lead hazards. The program is largely funded by federal dollars (HUD and EPA), with additional funding provided by the state's general fund. For more information see: https://www.health.state.mn.us/communities/environment/lead/index.html

Actions planned to reduce the number of poverty-level families

In Minnesota, there is a statewide network of Community Action Agencies (CAAs) and Tribal governments with a common purpose: fighting poverty and its effects in Minnesota communities. The goals of these agencies are to better focus available local, state, private, and federal resources to assist low-income individuals and families to acquire useful skills and knowledge, gain access to new opportunities, and achieve economic self-sufficiency. Each agency assesses needs, establishes priorities, determines strategies to respond to local poverty issues, and delivers a broad range of services and activities to strengthen self-reliance.

The specific programs delivered by the CAAs and tribal governments include:

- Energy Assistance: Provides financial assistance toward energy bills for low-income households;
- Weatherization: Offers weatherization of homes of low-income households to reduce heat loss and increase heating efficiency;
- Financial Literacy programming: Includes Family Assets for Independence in Minnesota, a program which matches low-income households' income with state, federal, and private funding for the purpose of buying a home, furthering education, or starting a business. Other forms of financial literacy programming include tax preparation assistance, budget counseling, and general financial education;
- Food Shelves and various nutrition programs: Provides food for households experiencing emergencies through the network of locally run food shelves;
- Head Start: Assists low-income families break the cycle of poverty by improving the health and social competence of children up to age 5 and pregnant women and by promoting economic self-sufficiency for parents;
- Homeless Programs: Provides assistance to households or individuals who are at-risk of being homeless, who are currently homeless, or who were previously homeless and are

receiving follow-up services;

- Housing Construction, Rehabilitation, and Assistance: Develops long-term low-income housing, including the rehabilitation of unoccupied housing and the provision of rental housing assistance.

Actions planned to develop institutional structure

The delivery of affordable housing programs authorized by the federal government and Minnesota state legislature is centralized in Minnesota Housing. DEED is the primary administrator and provider of CDBG funds in non-entitlement areas of the state. Minnesota Housing and DHS share the delivery of supportive housing programs for persons experiencing homelessness. DHS is primarily responsible for the delivery of supportive services for persons with special needs because many persons DHS serves are experiencing homelessness.

Affordable housing assistance in Minnesota depends upon a large network of local lenders, housing authorities, community action agencies, nonprofit and faith-based organizations, homeowner educators and counselors, and local governments throughout the state. The State relies on these entities to administer a number of affordable and supportive housing programs, to identify housing needs at the local level, and to encourage the development of affordable housing.

Recognizing the need to increase the accessibility and effectiveness of assistance programs for low- and very low-income people, Minnesota Housing has worked to increase the participation of local nonprofits and other nontraditional lenders in delivering its programs, including those led by Black, Indigenous, or people of color. These participants provide a greater opportunity to coordinate the delivery of assistance and to better target funds to people with the greatest need. Using state funds, Minnesota Housing runs a Capacity Building Grant Program, which builds the capacity of new and existing partners to address root causes of housing barriers within the housing systems. This grant prioritizes work by and for communities disproportionately experiencing housing challenges.

The State does not have any plans for developing new institutional structures but will continue to participate in the various structures currently in place, supporting the Minnesota Chapter of the National Association of Housing and Redevelopment Officials' conferences and the Working Together conference. Minnesota Housing coordinates its RFP selections with other funding partners, including DEED. CDBG grantees coordinate CDBG funding with Minnesota Housing, Greater Minnesota Housing Fund, DHS, Rural Development, Department of Health, and

Weatherization funding. DHS will continue to participate in the various structures currently in place. The State hosts the Minnesota Interagency Council on Homelessness (MICH), through which all state agencies involved in the provision of services to homeless persons meets monthly. Members of the MICH are assigned to all Continuum of Care committees and Family Homeless Prevention and Assistance Program advisory committees to provide technical assistance and attend meetings of these groups. The State also hosts the Interagency Stabilization Group as well as the Greater Minnesota Preservation Work Group and the Stewardship Council to ensure coordination of funding resources.

The State participates in several standing meetings with representatives from local government, nonprofit, and private providers of housing and homelessness services. For economic development CDBG activities, the state does not have any plans to develop new institutional structures but will continue to utilize collaborations already in place. DEED partners with communities, counties, non-profit agencies, the Economic Development Association of Minnesota, Minnesota Bankers Association, and the Council of Development Finance Agencies to ensure that funds are accessible to businesses throughout the state. Working with these partner organizations enables the State of Minnesota to better access underserved communities and address financing needs for local companies throughout the region.

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

The delivery of affordable housing programs authorized by the federal government and Minnesota state legislature is centralized in Minnesota Housing. DEED is the primary administrator and provider of CDBG funds in non-entitlement areas of the state. Minnesota Housing and DHS share the delivery of supportive housing programs for persons experiencing homelessness. DHS is primarily responsible for the delivery of supportive services for persons with special needs because many persons DHS serves are experiencing homelessness. Coordination between public and private housing and social services primarily occurs at the local or regional level and is supported by the Continuum of Care committees and other regional planning bodies funded, in part, by the State of Minnesota.

Affordable housing assistance in Minnesota depends upon a large network of local lenders, housing authorities, community action agencies, nonprofit and faith-based organizations, homeowner educators and counselors, and local governments throughout the state. The State relies on these entities to administer several affordable and supportive housing programs, to identify housing needs at the local level, and to encourage the development of affordable housing.

Recognizing the need to increase the effectiveness of assistance programs for low- and very low-income people, Minnesota Housing has worked to increase the participation of local nonprofits and other diverse lenders in delivering its programs. These diverse participants provide a greater opportunity to coordinate the delivery of assistance and to better target funds to people with the greatest need.

The State does not have any plans for developing new institutional structures but will continue to participate in the various structures currently in place, supporting the Minnesota Chapter of the National Association of Housing and Redevelopment Officials (NAHRO)'s conferences. Minnesota Housing coordinates its RFP selections with other funding partners, including DEED. DEED's CDBG grantees coordinate CDBG funding with Minnesota Housing, Greater Minnesota Housing Fund, DHS, Rural Development, Department of Health, and Weatherization funding. DHS will continue to participate in the structures currently in place. The State hosts the Minnesota Interagency Council on Homelessness (MICH), through which all state agencies involved in the provision of services to homeless persons meets monthly. Members of the MICH are assigned to all Continuum of Care committees and Family Homeless Prevention and Assistance Program advisory committees to provide technical assistance and attend meetings of these groups. The State hosts the Interagency Stabilization Group and the Greater Minnesota Preservation Work Group and the Stewardship Council to ensure coordination of funding resources. Finally, the State hosts the Olmstead Implementation Office, which is responsible for implementing the Olmstead Plan, a comprehensive plan to provide people with disabilities opportunities to live, learn, work and enjoy life in integrated settings.

The state participates in several standing meetings with representatives from local government, nonprofit, and private providers of housing and homelessness services.

The state does not have plans to provide financial assistance to troubled PHAs. Troubled and other PHAs are invited to participate in the NAHRO conference to receive training on topics relevant to their operations. Because the state is not a public housing owner, it does not have plans to encourage residents to become more involved in management of public housing or have a specific outreach plan to public housing residents to encourage homeownership. Public housing residents are eligible to apply for homeownership assistance and receive the same outreach as other potential first-time homebuyers.

Discussion:

Together with Greater Minnesota Housing Fund and Minnesota Housing Partnership,

OMB Control No: 2506-0117 (exp. 09/30/2021)

Minnesota Housing hosts Regional Housing Forums in different parts of the state to bring together a variety of housing and community partners to highlight available resources, provide examples of affordable housing development and listen and share information. These events support connection and collaboration between the public and Minnesota Housing and connections among partners within the region. In Fiscal Year 2026, Minnesota Housing held a forum on November 19, 2025 in the East Central Region and around 150 people attended. The Agency will also be hosting a housing forum in the South Central Region on June 9, 2026 and in the Southwest Region on August 11, 2026. Attendance around 100 to 150 people is anticipated for each of these forums.

Program Specific Requirements

AP-90 Program Specific Requirements – 91.320(k)(1,2,3)

Introduction:

The following includes program specific details for CDBG, HOME, ESG, and HTF funding.

Community Development Block Grant Program (CDBG)
Reference 24 CFR 91.320(k)(1)

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

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

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	70.00%

HOME Investment Partnership Program (HOME)
Reference 24 CFR 91.320(k)(2)

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

OMB Control No: 2506-0117 (exp. 09/30/2021)

as follows:

None.

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

   Not applicable because Minnesota will not use HOME for homebuyer assistance.

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

   Not applicable because Minnesota will not use HOME for homebuyer assistance.

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

   There are no plans for using HOME to refinance existing debt.

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

   Not applicable.

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

   Not applicable.

7. **If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).**

   Minnesota Housing does not limit to segments of the HOME eligible population. Minnesota Housing makes an effort to integrate units targeted to households experiencing homelessness or those at risk of homelessness across a variety of developments. Minnesota Housing solicits projects in the annual Multifamily Consolidated RFP. Within the scoring and selection criteria additional points are given to projects that propose to serve identified populations with a demonstrated need, including individuals experiencing homelessness

and seniors. Therefore, Minnesota Housing may utilize HOME funds in units that are targeted to High Priority Homeless households and senior households.
Minnesota Housing may also utilize HOME funds in units that are targeted to Persons with Disabilities. In the interest of furthering economic integration, High Priority Homeless and Persons with Disabilities units typically make up a small number of units in each development.

Emergency Solutions Grant (ESG)
Reference 91.320(k)(3)

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

All sub-recipients of ESG funding have been required by DHS to establish written standards for the provision of homelessness prevention and rapid rehousing assistance to persons experiencing homelessness. The State will not be developing statewide written standards due to the complex and varying needs and characteristics of the 87 counties in which ESG assistance is provided.

DHS has developed a monitoring tool based on the requirements found in 576.400(e)(3) and is conducting reviews of each sub-recipient's Written Standards during the annual monitoring cycle to ensure that they adequately include the elements broadly outlined in 576.400(e)(3).

DHS has provided guidance on required standards for prevention and rapid re-housing providers (evaluating eligibility, prioritizing assistance, determining type, amount and length of assistance) in completing their Written Standards in accordance with HUD’s requirements.

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

There are ten Continuum of Care regions in Minnesota, each of which has chosen to implement Coordinated Entry (Coordinated Assessment) in different ways to reflect the unique needs and homeless response systems operating in their communities. Because of this diversity in needs and approaches, it is impossible to describe these for each CoC region of the state. However, DHS routinely reviews ESG sub-recipients' participation in their respective CoC region(s) Coordinated Entry system and seeks to address any potential barriers to active participation in that system.

In addition, the MN Interagency Council on Homelessness (MICH) has a working group to advise and assist in the on-going development and improvement of coordinated assessment systems throughout the State.

The State works to ensure that its ESG sub-recipients are involved in this coordinated assessment to the maximum extent practicable, and that such participation requirements do not unintentionally prevent or discourage the most vulnerable people experiencing homelessness from receiving the outreach and emergency shelter they urgently need.

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

A portion of the FFY2026 ESG funds were awarded through a previous competitive Request for Proposals. The remaining amount will be awarded through an upcoming competitive Request for Proposal which has not yet been published. In both instances, eligible applicants include non-profit 501(c)(3) organizations and local units of government. Many of the non-profits are community and/or faith based.

The application process for ESG funding is open to programs primarily operating in the non-entitlement areas of the state who do not receive their own ESG allocation.

The allocation of funding to specific programs is based on the overall quality of responses to the evaluation criteria and in accordance with regional and local priorities, as established by each Continuum of Care (CoC) committee. Eligible organizations include local government, nonprofit, community, and faith-based organizations such as shelters, time-limited housing programs, and emergency service providers.

Requests For Proposals (RFPs) are sent to all current Homelessness, housing, and Support Services Administration (HHSSA) homeless programs grantees, all Continuum of Care Committees throughout the state, and all other interested parties who have contacted HHSSA during the year and expressed interest in the homeless program funding. DHS also publishes the RFP in the State Register and posts the RFP on the DHS website.

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

The recipient is a State and therefore not required to meet the homeless participation requirement in 24 CFR 576.405. However, all sub-recipients are expected to actively work to consult and involve homeless or formerly homeless individuals in their policy development and program operations and are monitored regularly on this topic. In addition, State staff are incentivizing providers to engage residents and former residents in an examination of rules and policies by including questions related to this practice in its funding Requests for Proposals (RFP) and monitoring tool ESG sub-recipients.

Over the past several years, the State has increased its consultation efforts with homeless and formerly homeless individuals. The State launched a Taskforce on Shelter to develop standards for shelter, and establish clearer oversight of the state's emergency shelters. Appointed representatives came from a wide range of backgrounds and groups and included significant representation from homeless and formerly homeless individuals.

Finally, the state's webinar series (begun to improve information and coordination during the COVID-19 pandemic) now features regular Speakers Bureau sessions for persons with lived experience to address policy makers and providers about their experiences of homelessness.

These and other contributions by persons with lived experience continue to increase DHS understanding of what homeless and formerly homeless individual experience when accessing the state's shelter and housing systems. DHS will continue to address these issues through its funding process, monitoring, and technical assistance for sub-recipients of ESG funding.

5. Describe performance standards for evaluating ESG.

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

For the current Action Plan Year, the following performance standards will be used for evaluating each FY2026 ESG-funded activity:

Prevention (Re-housing)/Rapid Re-housing:
# of individuals in households who are stably re-housed.

In addition to these performance standards, on-going evaluation of ESG sub-recipient performance occurs through DHS Grantee Risk Assessment Tool and its bi-annual monitoring process. This monitoring process places a heavy emphasis on program performance and effectiveness as well as ensuring sub-recipients have the technical assistance, they need to be successful.

The State will continue to share the outcomes of its monitoring visits with Continuum of Care Coordinators when there are relevant performance issues identified and seek mutual problem-solving and assistance from CoC committees when appropriate.

Housing Trust Fund (HTF)
Reference 24 CFR 91.320(k)(5)

1. How will the grantee distribute its HTF funds? Select all that apply:

☑ Applications submitted by eligible recipients

2. If distributing HTF funds through grants to subgrantees, describe the method for distributing HTF funds through grants to subgrantees and how those funds will be made available to state agencies and/or units of general local government. If not distributing funds through grants to subgrantees, enter "N/A".

N/A

3. If distributing HTF funds by selecting applications submitted by eligible recipients,

a. Describe the eligibility requirements for recipients of HTF funds (as defined in 24 CFR § 93.2). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Eligible entities for NHTF include owners or developers that must satisfy the definition of recipient and be either:

- A for profit entity,
- A 501(C)(3) nonprofit entity
- A government unit (excluding the federal government), or
- A religious organization

The owner must provide evidence of a qualifying interest in the property. Such interest must be recorded and appear in county records. The minimum qualifying interest in 100 percent fee simple interest that may also be subject to a mortgage.

The owners and development team must not be debarred or excluded from receiving federal assistance prior to selection, entering into a Written Agreement, or closing the loan.

Applicants and their development team must undergo an evaluation by Minnesota Housing of their capacity and pass Minnesota Housing underwriting before the applicant qualifies as an eligible recipient. Applicants must have demonstrated experience and capacity to implement an eligible NHTF activity as evidenced by its ability to own, construct, or rehabilitate, and manage and operate an affordable multifamily rental housing development.

Minnesota Housing underwriting standards require that at least one sponsor must demonstrate acceptable performance (multifamily housing experience) and financial capacity for the scale for the proposed project regardless of guaranty provisions, if any. All loans require a full sponsor credit review for final approval.

Eligible recipients will certify that housing units assisted with the NHTF will comply with NHTF program requirements during the entire period that begins upon selection and ending upon the conclusion of all NHTF funded activities. Recipients must demonstrate the ability and financial capacity to undertake and manage the eligible activity. Recipients must also demonstrate familiarity with requirements of other Federal, State or local housing programs that may be used in conjunction with NHTF funds to ensure compliance with all applicable requirements and regulations of such programs.

b. Describe the grantee's application requirements for eligible recipients to apply for HTF funds. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Minnesota Housing's annual Multifamily Consolidated RFP coordinates multiple housing funding resources, including NHTF and HOME, into one multifamily application process to maximize the number of projects that can be selected and to allocate funds as efficiently as possible. The process allows multifamily affordable development sponsors to apply for resources from Minnesota Housing and two other public entity funding partners using a common application and procedure. The Consolidated RFP application materials are generally issued in April, applicants are required to submit an intent to apply by May, and final applications are due in July.

Applications are evaluated for eligibility as detailed in the Multifamily RFP Standards. Multifamily staff review applications in two phases: 1. initial scoring; and 2. feasibility review. The initial scoring consists of reviewing individual applications to help ensure projects meet Low Income Housing Tax Credit (HTC) Qualified Allocation Plan (QAP), self-scoring worksheet, and scoring guide requirements. Once the initial scoring of applications in complete, applications are ranked per the QAP and Multifamily RFP standards. Projects are evaluated based on project type, scoring, geographic distribution, and funding resources available. Projects prioritized will move forward to feasibility review. This review consists of a detailed analysis of the application's project cost, funding structure, and financial capacity. The feasibility review is conducted by the internal development team, which consists of a program manager(s), underwriter, architect, housing management officer, and if applicable, a housing stability officer for the following:

- consistency with Minnesota Housing's mission and strategic priorities
- compliance with statutes and program rules, including geographic distribution of resources
- consistency with program requirement, eligible uses and priorities, and
- financial feasibility, market need, architectural quality and overall development team capacity

Once applications are considered feasible, they move on to a Selection Committee meeting, which includes underwriters, managers, and senior leadership. The Selection Committee deliberates on feasible applications compared with funding resources available, weighing appropriate uses of those funds and the agency's Strategic Priorities, feasibility, and organizational capacity and recommends a package of developments for selection. This recommendation is then brought before Minnesota Housing's Board of Directors for final review and approval.

c. Describe the selection criteria that the grantee will use to select applications submitted by eligible recipients. If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.

There are three main components of the RFP review process

- Initial Eligibility and Feasibility: Applicants must satisfy project feasibility and financial and organizational capacity requirements to be considered for funding. Once applications are submitted to the agency, they undergo application and eligibility review to determine if they meet the basic eligibility requirements. The applications then undergo feasibility review by staff underwriters, including detailed analysis of applicant and organization capacity and priority housing need.

- Strategic Priorities: Seven strategic priorities reflect the Agency's policy goals for funding priorities. Every proposal must satisfy at least one strategic priority to be eligible for funding through the RFP. Minnesota Housing gives priority to proposals that best meet the greatest number of strategic priorities.
- Selection Priorities: Among proposals that satisfy the Agency's strategic priorities, the Agency gives priority in awarding funding to those proposals that best meet the greatest number of selection priorities.
- Deferred Loan Funding Priorities: For deferred funding, including NHTF, Minnesota Housing will evaluate proposals for best available funding source based on specific requirements for programs.

d. Describe the grantee's required priority for funding based on geographic diversity (as defined by the grantee in the consolidated plan). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Minnesota Housing will accept and consider proposals for NHTF from across the state consistent with the state's certification to affirmatively further fair housing. The needs of very low income and extremely low-income tenants across Minnesota are a high priority in the Consolidated Plan; however, geographic location of a project may be considered in the context of the project's proximity to certain community features whose presence is a priority for Minnesota Housing.

Selection Priorities relate specifically to the geographic location of projects, including communities with a need for more affordable housing options, workforce housing communities, transit and walkability, metropolitan area, Greater Minnesota urbanized area, Greater Minnesota and small urban areas, and community revitalization areas such as rural and tribal areas, qualified census tracts, and opportunity zones. In sum, these geographic priority areas support a balanced and diverse distribution of resources across the state.

e. Describe the grantee's required priority for funding based on the applicant's ability to obligate HTF funds and undertake eligible activities in a timely manner. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Applicants should be capable of undertaking and completing NHTF funded activities in a timely manner, consistent with regulatory requirements to meet the two-year commitment and five-year expenditure deadlines. Applicants' ability to secure all necessary project funds and within a reasonable time period is evaluated during the Consolidated RFP process. Capacity of the entire development team is evaluated, taking into consideration experience with similar projects, financial and staff capacity, status of other projects in the team's development pipeline, and other factors relevant to the role of the entity.

As described in the agency's Multifamily RFP Standards, the following factors will be considered in determining whether an organization has demonstrated sufficient organizational capacity:

The applicant's related housing experience;

Whether the applicant has successfully completed similar projects or is partnering with other organizations that have successfully completed similar projects;

Whether the applicant has strong current and expected ongoing capacity to complete the proposed housing, and other proposals being developed by the organization including those previously selected by Minnesota Housing that have not yet been completed; and

Whether the applicant has the capacity to operate and maintain the rental housing long term.

f. Describe the grantee's required priority for funding based on the extent to which the rental project has Federal, State, or local project-based rental assistance so that rents are affordable to extremely low-income families. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Developments that provide fully executed commitments for project based rental assistance (standard or in conjunction with High Priority Homeless units) at the time of application are given selection priority.

g. Describe the grantee's required priority for funding based on the financial feasibility of the project beyond the required 30-year period. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

New Construction, rehabilitation, and rehabilitation and acquisition rental projects with NHTF have a required affordability period of thirty years. Additional preference will be given to projects that have commit to affordability for more than 30 years. Operating cost assistance reserves may be funded for the amount estimated to be necessary for up to fifteen years from the start of the affordability period.

h. Describe the grantee's required priority for funding based on the merits of the application in meeting the priority housing needs of the grantee (such as housing that is accessible to transit or employment centers, housing that includes green building and sustainable development features, or housing that serves special needs populations). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Minnesota's Consolidated Plan identifies priority housing needs among extremely low income renters for all renter household types. NHTF resources will be used exclusively to support units affordable to extremely low-income renters (at or below 30% of area median income), and will prioritize new construction activities to expand the housing stock for this population.

In addition to helping to meet the substantial unmet need of extremely low-income renters, Minnesota Housing has defined the following Strategic and Selection priorities. As described in the previous section, the Strategic Priority policies describe the main strategic focus and driving policy goals of Minnesota Housing in the current funding round and will be of primary importance in the evaluation of applications. The Selection Priorities capture other elements that are beneficial to a project. These priorities, described below, are communicated to potential applications through the "Strategic and Selections Priorities."

- Access to Transit or Walkability
- Greater Minnesota Workforce Housing
- Rural or Tribal
- Planned Community Development
- Preservation (including federally assisted housing)
- Supportive Housing

Among proposals that best satisfy these Strategic Priorities, Minnesota Housing will give priority in awarding funding to the proposals that best meet the greatest number of selection priorities in effect at the time of the RFP.

Selection priorities include:

- Greatest Need Tenant Targeting
- Large Family Housing
- Senior Housing
- Permanent Supportive Housing for High Priority Homeless (HPH), consistent with Local

Homelessness, consistent with Local Continuum of Care Priorities

- People with Disabilities
- Serves Lowest Income for Long Durations
- Preservation
- Rental Assistance
- Serves Lowest Income Tenants/Rent Reduction
- Long Term Affordability
- Increasing Geographic Housing Choice
- Access to More Affordable Housing
- Workforce Housing Communities
- Transit and Walkability
- Supporting Community and Economic Development
- Community Development Initiative
- Equitable Development
- Rural/Tribal
- QCT/Community Revitalization Tribal Equivalent Areas
- Efficient Use of Scarce Resources and Leverage
- Other Contributions
- Intermediary Costs
- Building Characteristics
- Universal Design
- Innovative Construction Techniques

i. Describe the grantee's required priority for funding based on the extent to which the application makes use of non-federal funding sources. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Minnesota Housing's NHTF funds will leverage other agency, private, and low-income housing tax credit investment. The NHTF funds will be made available through the agency's Consolidated RFP, which consolidates and coordinates multiple housing resources into one application process, including funding from the Metropolitan Council. Financing opportunities that could be leveraged with NHTF funds include several nonfederal sources through the State of Minnesota:

- Amortizing first mortgages through the State of Minnesota's Low- and Moderate-Income Rental Program
- Deferred loans through State of Minnesota funded Economic Development and Housing

OMB Control No: 2506-0117 (exp. 09/30/2021)

Challenge program

- Deferred loans through the State of Minnesota funded Preservation Affordable Rental Investment Fund
- Housing Investment Bonds through the State of Minnesota

Two of the agency's selection priorities incorporate a projects ability to leverage other resources. These include federal, local, philanthropic, and employer contributions; and financial readiness to proceed.

4. Does the grantee's application require the applicant to include a description of the eligible activities to be conducted with HTF funds? If not distributing funds by selecting applications submitted by eligible recipients, select "N/A".

Yes

5. Does the grantee's application require that each eligible recipient certify that housing units assisted with HTF funds will comply with HTF requirements? If not distributing funds by selecting applications submitted by eligible recipients, select "N/A".

Yes

6. Performance Goals and Benchmarks. The grantee has met the requirement to provide for performance goals and benchmarks against which the grantee will measure its progress, consistent with the grantee's goals established under 24 CFR 91.315(b)(2), by including HTF in its housing goals in the housing table on the SP-45 Goals and AP-20 Annual Goals and Objectives screens.

Yes

7. Maximum Per-unit Development Subsidy Amount for Housing Assisted with HTF Funds. Enter or attach the grantee's maximum per-unit development subsidy limits for housing assisted with HTF funds. The limits must be adjusted for the number of bedrooms and the geographic location of the project. The limits must also be reasonable and based on actual costs of developing non-luxury housing in the area.

If the grantee will use existing limits developed for other federal programs such as the Low Income Housing Tax Credit (LIHTC) per unit cost limits, HOME's maximum per-unit subsidy amounts, and/or Public Housing Development Cost Limits (TDCs), it must include a description of how the HTF maximum per-unit development subsidy limits were established

or a description of how existing limits developed for another program and being adopted for HTF meet the HTF requirements specified above.

Minnesota Housing's Consolidated RFP (including HTF, HOME and Low-Income Housing Tax Credits) reviews project costs through the Predictive Cost Model. The Predictive Cost Model is a tool that Minnesota Housing uses to identify, from a statistical perspective, proposed rental developments with unusually high costs. The model predicts the reasonable and actual costs of a proposed development based on building characteristics and cost data from developments that the Agency has previously financed or to which it has awarded or allocated HTCs and is benchmarked against industry-wide construction data. The model predicts the reasonable and actual costs of a proposed development based on building characteristics and cost data from developments that the Agency has previously financed or to which it has awarded or allocated HTCs and is benchmarked against industry-wide data. While the model is statistically robust, explaining 64% to 79% of the variation in historical costs, it cannot capture all the components of every proposed project. As a result, if a project's proposed total development cost (TDC) is more than a certain percentage (currently 25%) over the predicted cost model, staff must conduct additional due diligence to determine that the costs are still reasonable before seeking a cost waiver from the board. In addition, the QAP includes other criteria that appropriately incentives affordable housing development while managing costs and leveraging resources, including examining financial readiness to proceed/leveraged funds, other contributions, intermediary costs.

Previously, Minnesota Housing established a per-unit development subsidy at the same level as per unit cost thresholds established in the cost containment methodology associated with the QAP. In addition to the per-unit subsidy limits, subsidies were further limited on individual projects based on the result of subsidy layering reviews and the financing needs of the project. Additionally, per unit subsidy limits were subject to change whenever a new QAP was adopted or modified. Minnesota Housing received public feedback that the cost containment standards should consider those factors that result in increased, but necessary development costs, such as geography, larger family projects, and long-term cost savings. The Agency removed the cost containment selection criteria and projects will not complete for points against other projects if they are below a per unit threshold. In addition, adjustments are made in response to cost trends. Any changes will continue to be reasonable, based on actual costs, and adjusted for the number of bedrooms and geographic location of the program. With these QAP updates to cost containment methodology and Minnesota Housing's continued reliance on the predicative cost model tool, the NHTF maximum per-unit development subsidy limit will rely on the maximum per-unit development subsidy limits in effect for the HOME program.

8. Rehabilitation Standards. The grantee must establish rehabilitation standards for all HTF-assisted housing rehabilitation activities that set forth the requirements that the housing must meet upon project completion. The grantee's description of its standards must be in sufficient detail to determine the required rehabilitation work including methods and materials. The standards may refer to applicable codes or they may establish requirements that exceed the minimum requirements of the codes. The grantee must attach its rehabilitation standards below.

In addition, the rehabilitation standards must address each of the following: health and safety; major systems; lead-based paint; accessibility; disaster mitigation (where relevant); state and local codes, ordinances, and zoning requirements; Uniform Physical Condition Standards; Capital Needs Assessments (if applicable); and broadband infrastructure (if applicable).

All NHTF units must comply with Minnesota Housing's Multifamily Rental Housing Design/Construction Standards, including Chapter 9, Design, Construction, and Property Standards for Federally Funded Projects. These standards are found on the agency's website. Chapter 7 provides federal program requirements, while projects must achieve all requirements detailed in the guide.

9. Resale or Recapture Guidelines. Below, the grantee must enter (or attach) a description of the guidelines that will be used for resale or recapture of HTF funds when used to assist first-time homebuyers. If the grantee will not use HTF funds to assist first-time homebuyers, enter "N/A".

N/A.

10. HTF Affordable Homeownership Limits. If the grantee intends to use HTF funds for homebuyer assistance and does not use the HTF affordable homeownership limits for the area provided by HUD, it must determine 95 percent of the median area purchase price and set forth the information in accordance with §93.305. If the grantee will not use HTF funds to assist first-time homebuyers, enter "N/A".

N/A

11. Grantee Limited Beneficiaries or Preferences. Describe how the grantee will limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population to serve unmet needs identified in its consolidated plan or annual action

plan. If the grantee will not limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population, enter "N/A."
Any limitation or preference must not violate nondiscrimination requirements in Â§ 93.350, and the grantee must not limit or give preferences to students. The grantee may permit rental housing owners to limit tenants or give a preference in accordance with Â§ 93.303(d)(3) only if such limitation or preference is described in the action plan.

Minnesota Housing does not limit to segments of the NHTF eligible population. Minnesota Housing makes an effort to integrate units targeted to households experiencing homelessness or those susceptible to of homelessness across a variety of developments. Minnesota Housing solicits projects in the annual Multifamily Consolidated RFP. Within the scoring and selection criteria additional points are given to projects that propose to serve identified populations with a demonstrated need, one of which is individuals experiencing homelessness. Therefore, Minnesota Housing may utilize NHTF funds in units that are targeted to High Priority Homeless households. In the interest of furthering economic integration, High Priority Homeless units typically make up a small number of units in each development.

12. Refinancing of Existing Debt. Enter or attach the grantee's refinancing guidelines below. The guidelines describe the conditions under which the grantee will refinance existing debt. The grantee's refinancing guidelines must, at minimum, demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing. If the grantee will not refinance existing debt, enter "N/A."

Minnesota Housing will not use NHTF to refinance existing debt.

Discussion:

Not Applicable

OMB Control No: 2506-0117 (exp. 09/30/2021)

2026 Annual Action Plan Amendment Public Comments

Summary of Comments/Discussion:

<u>Resident's comment</u>

We have a lot of money given for education, farmers, infrastructure, and many other needs for our state. Nothing has been said or done for our growing population of needy seniors whose rents have gone up past our monthly SSI payments. We find ourselves homeless without enough sections 8 housing available to fill the need. I have worked 4-6 hours a day trying to find some help. Our county workers are so over loaded they don't even return phone calls for weeks at a time. I have spent all my money staying at a hotel waiting for the apt. that was told would be mine in a section 8 building by the end of the month. that was in june. All I have heard out of our capital is some housing will be built in a few years. Not good enough!!

Response: Thank you for your comment. We are sorry you're facing this situation. Having to spend your savings on a hotel while waiting months for housing you were told would be available is incredibly frustrating.

We know there is a significant need for affordable housing and rental assistance, particularly for people living on fixed incomes. We will continue to advocate on the federal and state levels for additional resources that will allow us to build housing that is affordable to Minnesotans at the lowest income levels.

<u>Resident's comment</u>

The Catch-22 of Homelessness Prevention: Why Saint Paul's System Fails Working Residents. After an illegal lockout by apartment complex management left me suddenly displaced, I found myself facing a crisis I was entirely unprepared for. Management escalated the situation by coming to the apartment with an aggressive pit bull and threatening to release the dog on me—using fear and intimidation to force me out and leave all my possessions behind.
Since that day, management has effectively held everything I own hostage, including my electronics like a 60-inch TV and a 40-inch TV, along with critical work essentials. I was left without my work clothes, work boots, or basic changes of clothes. Because my job exposes me to wet, dirty, and severe weather conditions, having proper dry gear to change into isn't a luxury; it's necessary to keep working and avoid getting sick from exposure to the elements.

Beyond my primary job, I lost the very tools and materials that define my livelihood and personal passion. All of my art supplies and the intricate artwork I crafted using size 11 seed beads were taken. Additionally, they locked away the mechanical tools I rely on to perform side jobs repairing cars and helping neighbors fix household issues—tools that allowed me to earn extra income and support others in my community.

To survive this sudden upheaval, I turned to a storage unit as a temporary refuge and a private space just to change into dry clothes between shifts. Having to resort to a storage unit simply to maintain basic dignity was heartbreaking, but making matters worse, facility management cited rule violations and ordered me never to return. Desperate for shelter, I found a place to stay with someone I believed was a friend. However, the environment quickly turned hostile. He became extremely demanding, and after I spoke the truth about how he and his girlfriend were manipulating and stealing from me—swindling roughly $500 of my hard-earned money—he kicked me out. Now, with strict time limits set by both the apartment complex and the storage facility to recover my possessions, the clock is ticking down while everything I own remains trapped or lost.

The emotional torment of endless, sleepless nights spent worrying about my property, combined with the exhausting burden of spending hours trying to navigate the court system on my own, has taken a heavy physical and mental toll. On top of working every day, I have spent countless hours endlessly reaching out to government offices, state programs, legal aid clinics, and non-profit organizations seeking legal counsel so I wouldn't have to face this complex court process alone on a low budget. Instead of real support, I was repeatedly turned away or given ineffective advice simply because these agencies don't handle cases like mine or lack the capacity to step in.

Yet, while filing court petitions, working every day, and surviving toxic temporary living conditions, I also reached out to local housing resources and Saint Paul's Coordinated Entry system seeking assistance to regain stability. What I discovered was a deeply frustrating administrative wall.

Because I maintain steady employment and have been forced to bounce between couch-surfing and unstable arrangements to avoid sleeping on the street, I was informed that I do not meet the criteria for housing assistance. Under current guidelines, the system does not recognize temporary, doubled-up living arrangements as homelessness. To qualify for meaningful support, an individual is effectively required to hit absolute rock bottom: remaining unsheltered or checking into local emergency shelters like Dorothy Day or Union Gospel Mission for up to a year, often alongside losing employment.

This structure creates a tragic paradox. A system intended to prevent homelessness should intervene to keep working individuals housed before a temporary crisis turns into chronic displacement. Market-rate rents across Ramsey County remain out of reach for single workers, waitlists for subsidized housing stretch for years, and bouncing between unsafe couches or racing against facility deadlines is neither a permanent nor secure solution. Expecting working people to navigate this market alone—while spending their days in court filings and their nights in mental anguish—defies logic.

We must reevaluate how housing assistance criteria are structured in Saint Paul and Ramsey County. Support programs should proactively assist working residents who are striving to maintain their independence, rather than forcing them into long-term chronic homelessness before offering a hand up. Catching people early in a crisis is not only more effective policy, but it is also the only truly compassionate path forward for our community.

Response: Thank you for sharing your story. We know that it can be incredibly difficult to navigate or access the various programs and resources that are available at local, county, state, and federal levels. The resources outlined in this plan are a small part of the overall need the State faces for housing, but will be used to help build housing for Minnesotans at very low, low, and moderate income levels. Minnesota Housing, DEED, and DHS all work hard to streamline the resources we do have available and to advocate for more accessible programming and additional resources to build housing all Minnesotans can afford.

<u>Resident's comment</u>

I'm writing to submit public comment on Minnesota Housing's substantial amendment to the 2026 Housing and Community Development Action Plan concerning the National Housing Trust Fund allocation.

As Minnesota incorporates this funding, I encourage the state to prioritize households with extremely low incomes who face severe housing-cost burdens, including people with disabilities who rely on fixed or limited incomes.

For many people, housing instability is not limited to literal homelessness. A household can technically remain housed while paying an unsustainable share of its income toward rent, leaving too little for food, transportation, healthcare, and other basic needs. National Housing Trust Fund investments should help prevent that kind of instability before it results in displacement or homelessness.

I also encourage Minnesota Housing to use these resources in ways that support accessible housing, long-term affordability, community integration, and meaningful housing choice. People with disabilities should be able to remain in ordinary community settings with the supports they need rather than having affordability pressures limit where or how they can live.

I appreciate Minnesota Housing providing an additional public-comment period and considering these priorities as the National Housing Trust Fund allocation is incorporated into the final Action Plan.

I am a disabled parent and former long-term public-housing resident. I eventually left deeply subsidized housing because, despite transfers and accommodations, the overall environment had become unsustainable for my disability, recovery, family responsibilities, and ability to function. I moved into the housing that was realistically available to me, which improved the quality and stability of my immediate living environment but came with a major loss of affordability.

That produces what I would describe as a transition penalty: a person can do what the system ostensibly wants — remain independently housed, avoid crisis or homelessness, and improve the suitability of their living situation — yet be financially penalized for doing so because there is no clear mechanism that preserves both housing suitability and deep affordability.

For a parent, that loss of affordability is not merely a budget issue. Severe rent burden affects the ability to maintain family relationships, participate in ordinary activities with a child, absorb emergencies, pursue employment, and build any meaningful financial margin. A move can therefore look like a successful housing outcome administratively while creating new barriers to family stability and community participation.

This concern now has institutional support as well. In an August 28 response after review by its policy and operations teams, MPHA told me that my feedback "correctly identifies a gap within the current housing ecosystem." MPHA also explained that it does not receive funding specifically for resident social services or security and is limited in addressing social determinants of health beyond its core housing function.

I would therefore ask that the 2026 Housing and Community Development Action Plan record consider the following policy question:

When a disabled person leaves an unsuitable deeply subsidized setting in order to remain successfully housed and integrated in the community, what state housing policy or cross-agency mechanism is responsible for preventing that move from resulting in long-term severe rent burden simply because the person had to choose suitability over subsidy?

Relatedly, should Minnesota's housing planning measure successful housing outcomes only by whether a household remains housed, or also by whether the housing remains affordable enough to support family stability, disability-related functioning, employment, and continued community participation?

I am not asking Minnesota Housing to duplicate work already underway through other agencies. I am asking that this specific transition gap be included in the formal policy record because it sits directly between affordable housing, homelessness prevention, disability policy, and family stability.

Thank you for including this supplemental comment in the record.

Response: Thank you very much for your comment. We appreciate the important policy questions you pose and recognize that there are gaps both in the policy and resource availability for the types of housing situations your comment describes. As stated in previous comments, all three State agencies represented in this Plan work hard to advocate among state and federal lawmakers for resources and legislative direction to keep Minnesotans housed in stable, safe and accessible homes they can afford in a community of their choice. We will continue to do so and to look for ways to develop programming and policies that reduce gaps that cause severe rent burden.