

Before Starting the CoC Application

You must submit all three of the following parts in order for us to consider your Consolidated Application complete:

1. the CoC Application,
2. the CoC Priority Listing, and
3. all the CoC's project applications that were either approved and ranked, or rejected.

As the Collaborative Applicant, you are responsible for reviewing the following:

1. The FY 2022 CoC Program Competition Notice of Funding Opportunity (NOFO) for specific application and program requirements.
2. The FY 2022 CoC Application Detailed Instructions which provide additional information and guidance for completing the application.
3. All information provided to ensure it is correct and current.
4. Responses provided by project applicants in their Project Applications.
5. The application to ensure all documentation, including attachment are provided.

Your CoC Must Approve the Consolidated Application before You Submit It

- 24 CFR 578.9 requires you to compile and submit the CoC Consolidated Application for the FY 2022 CoC Program Competition on behalf of your CoC.

- 24 CFR 578.9(b) requires you to obtain approval from your CoC before you submit the Consolidated Application into e-snaps.

Answering Multi-Part Narrative Questions

Many questions require you to address multiple elements in a single text box. Number your responses to correspond with multi-element questions using the same numbers in the question. This will help you organize your responses to ensure they are complete and help us to review and score your responses.

Attachments

Questions requiring attachments to receive points state, "You Must Upload an Attachment to the 4B. Attachments Screen." Only upload documents responsive to the questions posed—including other material slows down the review process, which ultimately slows down the funding process. Include a cover page with the attachment name.

- Attachments must match the questions they are associated with—if we do not award points for evidence you upload and associate with the wrong question, this is not a valid reason for you to appeal HUD's funding determination.

- We must be able to read the date and time on attachments requiring system-generated dates and times, (e.g., a screenshot displaying the time and date of the public posting using your desktop calendar; screenshot of a webpage that indicates date and time).

1A. Continuum of Care (CoC) Identification

HUD publishes resources on the HUD.gov website at CoC Program Competition to assist you in completing the CoC Application. Resources include:

- Notice of Funding Opportunity (NOFO) for Fiscal Year (FY) 2022 Continuum of Care Competition and Noncompetitive Award of Youth Homeless Demonstration Program Renewal and Replacement Grants;
- 24 CFR part 578;
- FY 2022 CoC Application Navigational Guide;
- Section 3 Resources;
- PHA Crosswalk; and
- Frequently Asked Questions

1A-1. CoC Name and Number: MN-501 - Saint Paul/Ramsey County CoC

1A-2. Collaborative Applicant Name: Ramsey County

1A-3. CoC Designation: CA

1A-4. HMIS Lead: Institute for Community Alliances

1B. Coordination and Engagement–Inclusive Structure and Participation

HUD publishes resources on the HUD.gov website at CoC Program Competition to assist you in completing the CoC Application. Resources include:

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1B-1.	Inclusive Structure and Participation–Participation in Coordinated Entry.	
	NOFO Sections VII.B.1.a.(1), VII.B.1.e., VII.B.1.p., and VII.B.1.r.	
	In the chart below for the period from May 1, 2021 to April 30, 2022:	
1.	select yes or no in the chart below if the entity listed participates in CoC meetings, voted—including selecting CoC Board members, and participated in your CoC's coordinated entry system; or	
2.	select Nonexistent if the organization does not exist in your CoC's geographic area:	

	Organization/Person	Participated in CoC Meetings	Voted, Including Electing CoC Board Members	Participated in CoC's Coordinated Entry System
1.	Affordable Housing Developer(s)	Yes	Yes	Yes
2.	Agencies serving survivors of human trafficking	Yes	Yes	Yes
3.	CDBG/HOME/ESG Entitlement Jurisdiction	Yes	Yes	Yes
4.	Disability Advocates	Yes	Yes	Yes
5.	Disability Service Organizations	Yes	Yes	Yes
6.	EMS/Crisis Response Team(s)	Yes	Yes	Yes
7.	Homeless or Formerly Homeless Persons	Yes	Yes	Yes
8.	Hospital(s)	Yes	Yes	Yes
9.	Indian Tribes and Tribally Designated Housing Entities (TDHEs) (Tribal Organizations)	Nonexistent	No	No
10.	Law Enforcement	Yes	Yes	Yes
11.	Lesbian, Gay, Bisexual, Transgender (LGBTQ+) Advocates	Yes	Yes	Yes
12.	LGBTQ+ Service Organizations	Yes	Yes	Yes
13.	Local Government Staff/Officials	Yes	Yes	Yes
14.	Local Jail(s)	Yes	Yes	Yes
15.	Mental Health Service Organizations	Yes	Yes	Yes
16.	Mental Illness Advocates	Yes	Yes	Yes

17.	Organizations led by and serving Black, Brown, Indigenous and other People of Color	Yes	Yes	Yes
18.	Organizations led by and serving LGBTQ+ persons	Yes	Yes	Yes
19.	Organizations led by and serving people with disabilities	Yes	Yes	Yes
20.	Other homeless subpopulation advocates	Yes	Yes	Yes
21.	Public Housing Authorities	Yes	Yes	Yes
22.	School Administrators/Homeless Liaisons	Yes	Yes	Yes
23.	State Domestic Violence Coalition	Yes	Yes	Yes
24.	State Sexual Assault Coalition	Yes	Yes	Yes
25.	Street Outreach Team(s)	Yes	Yes	Yes
26.	Substance Abuse Advocates	Yes	Yes	Yes
27.	Substance Abuse Service Organizations	Yes	Yes	Yes
28.	Victim Service Providers	Yes	Yes	Yes
29.	Domestic Violence Advocates	Yes	Yes	Yes
30.	Other Victim Service Organizations	Yes	Yes	Yes
31.	Youth Advocates	Yes	Yes	Yes
32.	Youth Homeless Organizations	Yes	Yes	Yes
33.	Youth Service Providers	Yes	Yes	Yes
	Other: (limit 50 characters)			
34.				
35.				

By selecting "other" you must identify what "other" is.

1B-2.	Open Invitation for New Members.	
	NOFO Section VII.B.1.a.(2)	

	Describe in the field below how your CoC:
1.	communicated a transparent invitation process annually (e.g., communicated to the public on the CoC's website) to solicit new members to join the CoC;
2.	ensured effective communication with individuals with disabilities, including the availability of accessible electronic formats;
3.	invited organizations serving culturally specific communities experiencing homelessness in the geographic area to address equity (e.g., Black, Latino, Indigenous, LGBTQ+, and persons with disabilities).

(limit 2,500 characters)

1) Annually, the CoC sends out an email news blast to over 600 people to invite them to join the CoC at either the Governing Board or Steering Committee level. It is publicly posted on our website, www.headinghomeramsey.org and Facebook page. In the months prior to the CoC's annual business meeting, we invite people through the newsletter and offer information sessions to people who want to learn more before running for election. We ask existing Governing Board and Steering Committee members to spread the word through their networks too.

2) The CoC, through its lead agency, Ramsey County has access to interpreters, including those that can read braille and/or provide American Sign Language. All meetings were conducted virtually allowing us to use captions and record and share meetings and agendas are shared ahead of time. We also regularly engage shelter staff, asking them to assist with helping people with lived experience and disabling conditions to access the virtual meetings.

3) To address improved equity strategies, the CoC actively invites culturally specific organizations, particularly those working with African Americans, Native Americans, and Latinos, who are over-represented in Ramsey County's homeless population. Many of these organizations sit on the Governing Board or Steering Committee. 29% of the CoC's Governing Board voting members identify as BIPOC (Black, Indigenous and People of Color.) Many of the CoC's service provider members serve people with disabilities and support members of the LGBTQ+ Community or are members of those communities themselves. In the field, Ramsey County and the City of Saint Paul partner with culturally-based community organizations to build trust, expand connections, and share information.

1B-3.	CoC's Strategy to Solicit/Consider Opinions on Preventing and Ending Homelessness.	
	NOFO Section VII.B.1.a.(3)	

	Describe in the field below how your CoC:
1.	solicited and considered opinions from a broad array of organizations and individuals that have knowledge of homelessness, or an interest in preventing and ending homelessness;
2.	communicated information during public meetings or other forums your CoC uses to solicit public information; and
3.	took into consideration information gathered in public meetings or forums to address improvements or new approaches to preventing and ending homelessness.

(limit 2,500 characters)

1) The CoC hosts two all member CoC meetings per year (~100 attendees), quarterly Governing Board (GB) meetings (25 members, usually 20-30 guests), and monthly Steering Committee (SC) meetings on month's without other CoC meetings (25 members, usually 20 guests.) All meetings are open to the public and are advertised on the website, in the monthly newsletter, and on the Facebook page. These meetings are used to solicit and consider opinions from a broad array of stakeholders that have knowledge of, lived experience with, or an interest in preventing and ending homelessness. Agendas are structured to get feedback on timely issues (e.g. cold weather policies, shelter access, encampment protocols.) The CoC asks for direction on specific strategies and tactics, solicits feedback on proposed approaches, and encourages deeper engagement through workgroups and committees. The CoC also uses surveys and polls to get additional input and help inform priorities. Typically, the fall meeting is used to gather insights that will inform the work of the coming year.

2) Since the pandemic, all of the CoC's meetings have been on Zoom and are open to all. We communicate information through presentations (with opportunities for discussion), open calls for announcements, and sharing materials before and after the meeting via email and links to our CoC Google Drive. Ahead of meetings we reach out to shelter staff and seek their assistance with outreach and invitations for those with lived experience to participate in meetings.

3) The feedback received at public meetings is used to inform annual action plans and strategic approaches. Input is funneled into issue-specific workgroups that plan and design interventions and make recommendations to the Governing Board for funding and implementation. This past year, the CoC has used this input to support efforts to increase the amount of housing available for people with incomes at or below 30% AMI, to successfully advocate for new models of shelter, to inform development of a plan to address unsheltered homeless, and to launch a prevention and tenant stabilization plan.

1B-4.	Public Notification for Proposals from Organizations Not Previously Awarded CoC Program Funding.	
	NOFO Section VII.B.1.a.(4)	
	Describe in the field below how your CoC notified the public:	
1.	that your CoC will consider project applications from organizations that have not previously received CoC Program funding;	
2.	about how project applicants must submit their project applications—the process;	
3.	about how your CoC would determine which project applications it would submit to HUD for funding; and	
4.	how your CoC effectively communicated with individuals with disabilities, including making information accessible in electronic formats.	

(limit 2,500 characters)

1) The CoC encourages and considers project applications from organizations that have not previously received CoC funding and has an open local competition for new project applications. A letter of interest (LOI) is publicly shared on the Heading Home Ramsey (HHR) webpage and Facebook page and via email to the 600 plus listserv that includes a full range of organizations and advocates seeking to prevent and end homelessness. People who receive the email notification are asked to share with partner agencies.

2) Respondents are invited to an optional Informational Meeting that describes how to submit an application. The presentation and FAQs about the LOI process are publicly posted on the HHR website. The CoC coordinator and other lead agency staff provide applicant technical assistance as requested. Project applicants were asked to submit pre-project applications via Microsoft Forms. If selected, they are then invited to register an account with e-snaps and submit a new project application that is then submitted to the CoC Priority Listing Application.

3) The CoC utilizes a scoring tool that is approved by the CoC Governing Board. This tool covers CoC threshold requirements, project performance measures (project-level HMIS data from previous grant period, responses to LOI and eSNAPS applications, annual monitoring results, alignment with HUD NOFO policy priorities and CoC Needs Assessment). New projects adhere to a similar process with the exception of reviewing HMIS data. The ranking committee is provided a link to the CoC Google Drive to have access to the documents for their review for ranking purposes, the CoC Evaluator provides a spreadsheet with the overall scoring results for all projects. The Ranking Committee confirms their approval of funding by majority vote.

4) The CoC effectively communicates with people with disabilities by ensuring all Zoom meetings are open to the public; which allows for transcription to be turned on. All providers have access to Minnesota State's Language Line interpreters to ensure people with disabilities have access to services and can participate in meetings. Agendas and Power Points are sent out ahead of time so individuals have an opportunity to prepare for meeting participation such as converting information such as screen reader technology.

1C. Coordination and Engagement

HUD publishes resources on the HUD.gov website at CoC Program Competition to assist you in completing the CoC Application. Resources include:

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1C-1.	Coordination with Federal, State, Local, Private, and Other Organizations.	
	NOFO Section VII.B.1.b.	
	In the chart below:	
	1. select yes or no for entities listed that are included in your CoC's coordination, planning, and operations of projects that serve individuals, families, unaccompanied youth, persons who are fleeing domestic violence who are experiencing homelessness, or those at risk of homelessness; or	
	2. select Nonexistent if the organization does not exist within your CoC's geographic area.	

	Entities or Organizations Your CoC Coordinates with for Planning or Operations of Projects	Coordinates with the Planning or Operations of Projects?
1.	Funding Collaboratives	Yes
2.	Head Start Program	No
3.	Housing and services programs funded through Local Government	Yes
4.	Housing and services programs funded through other Federal Resources (non-CoC)	Yes
5.	Housing and services programs funded through private entities, including Foundations	Yes
6.	Housing and services programs funded through State Government	Yes
7.	Housing and services programs funded through U.S. Department of Health and Human Services (HHS)	Yes
8.	Housing and services programs funded through U.S. Department of Justice (DOJ)	Yes
9.	Housing Opportunities for Persons with AIDS (HOPWA)	Yes
10.	Indian Tribes and Tribally Designated Housing Entities (TDHEs) (Tribal Organizations)	Nonexistent
11.	Organizations led by and serving Black, Brown, Indigenous and other People of Color	Yes
12.	Organizations led by and serving LGBTQ+ persons	Yes
13.	Organizations led by and serving people with disabilities	Yes
14.	Private Foundations	Yes
15.	Public Housing Authorities	Yes
16.	Runaway and Homeless Youth (RHY)	Yes
17.	Temporary Assistance for Needy Families (TANF)	Yes
	Other:(limit 50 characters)	

18.		
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1C-2.	CoC Consultation with ESG Program Recipients.	
	NOFO Section VII.B.1.b.	

	Describe in the field below how your CoC:
1.	consulted with ESG Program recipients in planning and allocating ESG and ESG-CV funds;
2.	participated in evaluating and reporting performance of ESG Program recipients and subrecipients;
3.	provided Point-in-Time (PIT) count and Housing Inventory Count (HIC) data to the Consolidated Plan jurisdictions within its geographic area; and
4.	provided information to Consolidated Plan Jurisdictions within your CoC's geographic area so it could be addressed in Consolidated Plan update.

(limit 2,500 characters)

1) The CoC consults with ESG Program recipients in planning and allocating ESG and ESG-CV funds by utilizing the same ranking committee. This helps to ensure complementarity of ESG-funded projects with CoC Program funded projects. The City of St. Paul also entered into a Joint Powers Agreement (JPA) with Ramsey County to administer the ESG and ESG-CV funds to better align ESG and ESG-CV with the CoC.

2) Ramsey County, the CoC lead agency and Collaborative Applicant funds a full-time Planner and Evaluation Analyst position responsible for monitoring and evaluating the ESG and CoC-funded program recipients and subs. During annual monitoring visits, staff review 2 randomly-selected client files, financial records, and interview subrecipient staff. Staff review counseling work plan(s), training received by staff within the last two years, community resources to which clients are referred, forms provided to clients who utilize the subrecipient's services, and a list of HUD-eligible clients counseled/provided with case management within the last 12 months.

3) The CoC provided Point-in-Time (PIT) count and Housing Inventory Count (HIC) data to the Consolidated Plan jurisdictions of both City of St. Paul and the Dakota County Consortium (suburban Ramsey County).

4) Each year, the CoC provides information to the City of St. Paul and the Dakota County Consortium to inform the Consolidated Plan update. The CoC shares results from the HUD System Performance Measures, the PIT and HIC so that the Consolidated Plan can address housing needs at deeply affordability levels. Following the plan's call for 15,000 affordable housing units, an influx of ARPA funds, and the county's first ever Housing & Redevelopment levy, the city and county have funded an unprecedented amount of deeply affordable housing. Between 10/1/2021 – 12/31/2022, Ramsey County and the City of Saint Paul have funded 508 units of housing affordable to people making 30% Area Median Income.

1C-3.	Ensuring Families are not Separated.	
	NOFO Section VII.B.1.c.	

Select yes or no in the chart below to indicate how your CoC ensures emergency shelter, transitional housing, and permanent housing (PSH and RRH) do not deny admission or separate family members regardless of each family member's self-reported sexual orientation and gender identity:

1.	Conducted mandatory training for all CoC- and ESG-funded service providers to ensure families are not separated.	No
2.	Conducted optional training for all CoC- and ESG-funded service providers to ensure families are not separated.	No
3.	Worked with ESG recipient(s) to adopt uniform anti-discrimination policies for all subrecipients.	Yes
4.	Worked with ESG recipient(s) to identify both CoC- and ESG-funded facilities within your CoC's geographic area that might be out of compliance and took steps to work directly with those facilities to bring them into compliance.	Yes
5.	Sought assistance from HUD by submitting AAQs or requesting technical assistance to resolve noncompliance of service providers.	Yes
6.	Other. (limit 150 characters)	

1C-4.	CoC Collaboration Related to Children and Youth—SEAs, LEAs, School Districts.	
	NOFO Section VII.B.1.d.	

Select yes or no in the chart below to indicate the entities your CoC collaborates with:

1.	Youth Education Provider	Yes
2.	State Education Agency (SEA)	Yes
3.	Local Education Agency (LEA)	Yes
4.	School Districts	Yes

1C-4a.	Formal Partnerships with Youth Education Providers, SEAs, LEAs, School Districts.	
	NOFO Section VII.B.1.d.	

Describe in the field below the formal partnerships your CoC has with at least one of the entities where you responded yes in question 1C-4.

(limit 2,500 characters)

1C-4a. The CoC's formal partnerships include the CoC Governance Charter specifying that a superintendent from one of five districts in the CoC's geography will have an appointed seat on the Governing Board. In addition, the McKinney-Vento liaison for the Saint Paul Public Schools is a member of the Steering Committee and co-chairs the CoC's work on family shelters.

The CoC partners with the suburban Ramsey County school districts through Homework Starts with Home - a comprehensive, rapid restabilization service funded by the State of Minnesota, to help prevent or minimize the amount of time a family experiences homelessness. All housing referrals are through Coordinated Entry. CoC members participate in weekly Heading Home Basic Needs Practitioner meetings where participants focus on coordinating resources and building capacity to respond to the increasing need.

The Heading Home Ramsey Suburban Homeless Prevention Planning Team is a partnership between Heading Home Ramsey, the Suburban Ramsey Family Collaborative which includes schools, social service and community partners, and the faith community. It hosts a monthly Basic Needs Practitioner's Peer Learning Team to address complex barriers to housing stability through creative problem solving and teamwork. This team helps suburban homeless students and their families remain in their school districts and communities by mobilizing formal and informal supports through integrated and coordinated efforts. The CoC Coordinator and Ramsey County as the lead agency are signatories to this MOU.

Ramsey County Workforce Solutions is a part of the CoC and holds a Homeless Youth Waiver for its federal WIOA funds. Workforce Solutions also formally partners with Face to Face to provide supports and services for youth and young adults who have/are experiencing homelessness. Face to Face Career Services provides individualized career coaching, internships, job shadowing, tutoring & educational supports, youth leadership opportunities and workshops to teach professionalism, entrepreneurial skills and financial literacy.

1C-4b.	Informing Individuals and Families Experiencing Homelessness about Eligibility for Educational Services.	
	NOFO Section VII.B.1.d.	

Describe in the field below written policies and procedures your CoC adopted to inform individuals and families who become homeless of their eligibility for educational services.

(limit 2,500 characters)

The CoC's partners, the McKinney Vento liaisons for each of the five school districts in the CoC's geography as well as individual providers that work with families with school aged children, are responsible for informing individuals and families about the availability of educational services.

For example, the Saint Paul Public School district, the county's largest, runs Project Reach which is led by the district homeless liaison who oversees home school liaisons, school social workers, a parent educator, certified teachers, and a transportation coordinator. The REACH Homeless Liaisons are shelter contacts and are available to help students enroll in school, usually within one day of intake. They assess/implement transportation when necessary. They also help coordinate early childhood screenings for homeless preschoolers to ensure registration in kindergarten. Each parent is given a packet of information that explains all early childhood educational offerings in the district and community including Head Start, School Readiness, Community Kindergarten and application information on Early Kindergarten.

There are two full time school social workers in the Title I homeless program that provide information and referrals for housing, mental health, medical assistance, legal consultation, basic needs, social services, child protection and transportation, as well as assist in attendance and enrollment of homeless students. This position conducts an assessment of family needs to advocate for special education services when appropriate. The Transportation Coordinator helps streamline the out-of-district transportation requests and coordinates the transportation of homeless students residing in emergency foster care.

Lastly, under the guidance of an Evening Academic Coordinator, highly qualified licensed teachers and social workers provide tutoring at shelter sites after school in the evenings. Literacy and math enrichment programs complement the classroom curriculum by leading kids through a wide range of activities that are challenging and engaging and help youth meet K-12 district, state, and national standards.

1C-4c.	Written/Formal Agreements or Partnerships with Early Childhood Services Providers.	
	NOFO Section VII.B.1.d.	

Select yes or no in the chart below to indicate whether your CoC has written formal agreements or partnerships with the listed providers of early childhood services:

		MOU/MOA	Other Formal Agreement
1.	Birth to 3 years	No	No
2.	Child Care and Development Fund	No	No
3.	Early Childhood Providers	No	No
4.	Early Head Start	No	No
5.	Federal Home Visiting Program--(including Maternal, Infant and Early Childhood Home and Visiting or MIECHV)	No	No
6.	Head Start	No	No
7.	Healthy Start	No	No
8.	Public Pre-K	No	No
9.	Tribal Home Visiting Program	No	No
	Other (limit 150 characters)		

10.	The CoC's family shelters regularly meet with and connect families to all early childhood resources offered by school districts and other providers.	No	Yes
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1C-5.	Addressing Needs of Domestic Violence, Dating Violence, Sexual Assault, and Stalking Survivors—Collaborating with Victim Service Providers.	
	NOFO Section VII.B.1.e.	

Describe in the field below how your CoC regularly collaborates with organizations who help provide housing and services to survivors of domestic violence, dating violence, sexual assault, and stalking to:

1.	update CoC-wide policies; and
2.	ensure all housing and services provided in the CoC are trauma-informed and can meet the needs of survivors.

(limit 2,500 characters)

1) St. Paul/Ramsey CoC coordinates with victim services providers and with Violence Free Minnesota (formerly Minnesota Coalition for Battered Women (MCBW) and the Minnesota Department of Justice to ensure all CoCs in Minnesota are reviewing and updating their policies annually for providers of housing and services to survivors of domestic violence, sexual assault and stalking. The Department of Justice has a representative who attends the CoC Coordinator's monthly meeting on a quarterly basis to share updates on funding, best practices and/or to answer training questions with the CoCs. The CoC has updated its Coordinated Entry policy to address Victim-Survivor issues related to assessment, safety planning, and data privacy.

2. All CoC funded providers confirm during the annual renewal and new project process that their programs are trauma-informed (including other evidenced-based engagement practices) and that their project has site-based safety measures in place to support the needs of survivors. This information is assessed annually by lead agency evaluation staff during the project monitoring process. Providers can participate in trainings offered by Minnesota-wide Engagement on Shelter and Housing (MESH) and others to ensure that staff are up-to-date on trauma-informed practices for survivors.

1C-5a.	Annual Training on Safety and Best Practices to Address the Needs of Domestic Violence, Dating Violence, Sexual Assault, and Stalking Survivors.	
	NOFO Section VII.B.1.e.	

Describe in the field below how your CoC coordinates to provide training for:

1.	project staff that addresses best practices (e.g., trauma-informed, victim-centered) on safety and planning protocols in serving survivors of domestic violence and indicate the frequency of the training in your response (e.g., monthly, semi-annually); and
2.	Coordinated Entry staff that addresses best practices (e.g., trauma informed care) on safety and planning protocols in serving survivors of domestic violence and indicate the frequency of the training in your response (e.g., monthly, semi-annually).

(limit 2,500 characters)

1C-5a.1 St. Paul/Ramsey CoC coordinates with victim services providers to provide annual training to CoC members. Victim services provider plan and implement trainings internally and for CoC providers; and the CoC coordinator shares this information with the 600+ person listserv. Violence Free Minnesota offers training and resources for all of Minnesota. They conduct an annual survey in conjunction with the HUD PIT Survey regarding those that are homeless because of domestic violence, dating violence, sexual assault, and stalking. Violence Free Minnesota is a well-established membership organization with a strong history of effectively carrying out programming that advances women's safety and security. They partner with organizations like Minnesota-wide Engagement on Shelter and Housing (MESH) and the CoCs to provide safety and best practices training on safety and planning protocols in serving survivors of domestic violence. Violence Free Minnesota sends a representative to the CoC Coordinators monthly meeting as needed to share training opportunities and other best practices.

2) The CoC requires Coordinated Entry Assessors to provide training on trauma-informed care. The training emphasizes trauma-informed care, client choice, confidentiality, administration of the assessment, entering assessments in HMIS, and coordinating with Day One Services for people or households that identify as fleeing or attempting to flee from domestic violence. Safety planning training is required and provided by the providers. MESH also offers trauma-informed care trainings open to anyone in Minnesota.

1C-5b.	Using De-identified Aggregate Data to Address the Needs of Domestic Violence, Dating Violence, Sexual Assault, and Stalking Survivors.	
	NOFO Section VII.B.1.e.	
	Describe in the field below:	
1.	the de-identified aggregate data source(s) your CoC uses for data on survivors of domestic violence, dating violence, sexual assault, and stalking; and	
2.	how your CoC uses the de-identified aggregate data described in element 1 of this question to evaluate how to best meet the specialized needs related to domestic violence and homelessness.	

(limit 2,500 characters)

1C-5b-1. DV providers funded by the CoC each have their own comparable database to track services provided to victims. Minnesota's statewide coalition for victim-service providers (VSPs), Violence Free MN, recently led a grant-funded initiative to assist VSPs in assessing their software vendors. The goal was to assess whether their available databases were truly HMIS comparable databases. Violence Free MN staff also liaised with vendors directly. Staff from the HMIS Lead Agency were actively involved in this initiative, providing guidance with respect to HMIS data standards. HMIS staff participated in meetings with VSPs and funders as needed. Violence Free MN participates in the annual Point in Time (PIT) Count, as do other victim service provider organizations.

1C-5b-2. The CoC independently tracks individuals and/or heads of households that are attempting to flee domestic violence and/or who are fleeing domestic violence during the annual Point in Time (PIT) Count and Housing Inventory Count (HIC) to determine the bed capacity needed for survivors of domestic violence.

1C-5c.	Communicating Emergency Transfer Plan to Domestic Violence, Dating Violence, Sexual Assault, and Stalking Survivors.	
	NOFO Section VII.B.1.e.	
	Describe in the field below how your CoC communicates to all individuals and families seeking or receiving CoC Program assistance:	
1.	the emergency transfer plan policies and procedures; and	
2.	the process for individuals and families to request an emergency transfer.	

(limit 2,500 characters)

1C-5c.1. The CoC is concerned about the safety of individuals and families receiving and seeking CoC program assistance. In accordance with the Violence Against Women Act (VAWA) and consistent with the Coordinated Entry Policy Manual, the CoC allows participants who are victims of domestic violence, dating violence, sexual assault, or stalking to request an emergency transfer from the participant's current housing placement to another placement. The ability to request a transfer is available regardless of sex, gender identity, or sexual orientation. The ability of the CoC to honor a transfer depends on a preliminary determination that the participant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, and on whether the CoC can facilitate the individual's or household's chosen transfer to another available and safe location. All decisions and action are taken by the Transfers, Reviews, and Accommodations in Coordinated Entry (TRACE) committee, which meets weekly and quickly approves and prioritizes the client(s) to be considered first for all eligible vacancies.

1C-5c.2 If an individual or family receiving CoC program assistance needs to be transferred due to issues of domestic violence, dating violence, sexual assault or stalking, they work with their housing program or case manager to fill out a short "Grievance and Appeals" form. The form can be filled out directly by the client, a provider, an advocate, case manager, etc. It is available on the CoC's website and on Lutheran Social Services' CE website. The forms come to the lead Coordinated Entry staff and the TRACE committee meets every Monday to review requests. When there is an urgent situation, the CE lead reaches out to the TRACE team prior to the meeting. If the transfer has all the needed information and is approved and there is a program with a vacancy reported, and the client meets the program's eligibility requirements, they could be referred and start the process immediately. If there are multiple barriers and/or there are specific requirements (i.e., needs to be a 4-bedroom, needs to allow animals, must be a subsidized unit only, needs mental health supportive services, must be on a bus line, etc.) for the next housing option, it is dependent on when an opening that meets that criteria becomes available in a program.

1C-5d.	Access to Housing for Survivors of Domestic Violence, Dating Violence, Sexual Assault, and Stalking.	
	NOFO Section VII.B.1.e.	
	Describe in the field below how your CoC ensures that survivors of domestic violence, dating violence, sexual assault, or stalking have access to all of the housing and services available within the CoC's geographic area.	

(limit 2,500 characters)

1C-5d. The CoC ensures that survivors of domestic violence, dating violence, sexual assault, or stalking have access to all of the housing and services available within the CoC's geographic area. The CoC implemented an "Access to Coordinated Entry for Victim-Survivors" policy that addresses the ways in which the CoC's Coordinated Entry system will ensure victim-centered, trauma-informed access to the CES for victims of domestic violence, dating violence, sexual assault, stalking, and/or trafficking. All individuals and families self-identifying as fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, and/or trafficking will be considered HUD homeless and eligible to be assessed by a Coordinated Entry to Youth and Singles (CEYS) or Coordinated Access to Housing and Shelter (CAHS) assessor, regardless of where they are currently sleeping or if they currently own or lease a home. All individuals and families have the right to refuse (1) the inclusion of their data in HMIS and/or (2) statewide sharing of their personal data. Refusal of HMIS and/or statewide data sharing will not preclude individuals or families from assessment, the priority list, or referral. Priority List Managers will ensure fair and equitable prioritization and referral of individuals and families who have not consented. In accordance with the Violence Against Women Act, HUD has prohibited Victim Service Providers (VSPs) from entering data into HMIS. All clients being assessed by VSPs will not have any data provided directly to VSPs entered into HMIS whether by the VSP directly or by any proxy.

1C-5e.	Including Safety, Planning, and Confidentiality Protocols in Coordinated Entry to Address the Needs of Domestic Violence, Dating Violence, Sexual Assault, and Stalking Survivors.	
	NOFO Section VII.B.1.e.	
	Describe in the field below how your CoC's coordinated entry includes:	
1.	safety protocols,	
2.	planning protocols, and	
3.	confidentiality protocols.	

(limit 2,500 characters)

1C-5e.1 CoC Coordinated Entry staff are trained on the complex dynamics of domestic violence, privacy and confidentiality, and safety planning, including how to handle emergency situations at an access point(s), whether a physical or virtual location. Training helps assessors learn that creating safe environments includes, showing gratitude, being empathetic, and acknowledging that it is difficult and traumatizing for the client to talk about their experience. The CoC also has a strong partnership with Day One, a hotline for those experiencing or attempting to flee domestic violence. Day One representatives directly refer households to a domestic violence shelter in the state of Minnesota. From there, households have a choice to utilize DV housing specific to the shelters or to be assessed by Coordinated Entry.

1C-5e.2 When a client discloses experience of abuse, assessors are trained to connect the client – in that moment or at a later time, as preferred by the client – to DV resources (e.g. the Minnesota Day One Crisis Line, Youth And Young Adult program at Tubman, etc.) to receive assistance with safety planning and connection to other desired services. Assessors are trained in trauma-informed assessment practices.

1C-5e.3 A lot of sensitive, dangerous, and incriminating information is shared during an assessment and HHR Assessors take great care with ensuring that confidentiality is maintained. First, the Assessor explains what the assessment will be like, preparing individuals for the conversation that may be triggering. Then the Assessor explains that sharing the information is voluntary, but often critical in order to foster successful housing and housing support matches. The CoC also ensures client choice for housing and services while ensuring safety and confidentiality. Clients have a choice of being assessed by Tubman Agency, a domestic violence agency, or by any of the current Coordinated Entry assessors. All assessors are required to attend an “Assessor” training annually that incorporates trauma-informed training and client choice. Per the Client Choice policy, clients have the right to refuse any referral and remain on the priority list for Coordinated Entry, especially if housing and services would jeopardize client safety.

1C-6.	Addressing the Needs of Lesbian, Gay, Bisexual, Transgender and Queer+–Anti-Discrimination Policy and Training.	
	NOFO Section VII.B.1.f.	

1.	Did your CoC implement a written CoC-wide anti-discrimination policy ensuring that LGBTQ+ individuals and families receive supportive services, shelter, and housing free from discrimination?	Yes
2.	Did your CoC conduct annual CoC-wide training with providers on how to effectively implement the Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity (Equal Access Final Rule)?	No
3.	Did your CoC conduct annual CoC-wide training with providers on how to effectively implement Equal Access in Accordance With an Individual's Gender Identity in Community Planning and Development Programs (Gender Identity Final Rule)?	No

1C-6a.	Anti-Discrimination Policy–Updating Policies–Assisting Providers–Evaluating Compliance–Addressing Noncompliance.	
	NOFO Section VII.B.1.f.	

Describe in the field below:

1.	whether your CoC updates its CoC-wide anti-discrimination policy, as necessary, based on stakeholder feedback;
2.	how your CoC assisted providers in developing project-level anti-discrimination policies that are consistent with the CoC-wide anti-discrimination policy ensuring that LGBTQ+ individuals and families receive supportive services, shelter, and housing free from discrimination;
3.	your CoC's process for evaluating compliance with your CoC's anti-discrimination policies; and
4.	your CoC's process for addressing noncompliance with your CoC's anti-discrimination policies.

(limit 2,500 characters)

1C-6a 1. The CoC's anti-discrimination policy is updated based on new information and stakeholder feedback. The CoC's anti-discrimination policy requires that recipients and subrecipients of funding from HUD's CoC and Emergency Solutions Grant must comply with the nondiscrimination and equal opportunity provisions of Federal civil rights laws. The policy was updated summer 2022 to address Fair and Equitable Access in Coordinated Entry. Specifically, the policy requires that Coordinated Entry will make every effort to reasonably accommodate for fair and equitable access regardless of actual or perceived status including: race, ethnicity, color, national origin, religion, sex, age, marital or familial status, disability or handicap, sexual orientation, gender identity (including transgender), immigration or refugee status, and child protection involvement.

1C-6a 2. The CoC assists providers through the annual monitoring process and offers suggestions for areas of improvement.

1C-6a 3. In addition to evaluating compliance during monitoring visits, the CoC has created and documented a policy to ensure that there is a clear and consistent process for resolving grievances and appeals through Coordinated Entry that involve: 1) access to services; 2) procedural fairness; 3) timeliness; 4) confidentiality; 5.) provider concerns; and 6.) client experience. The 8-member Transfers, Reviews, and Accommodations in Coordinated Entry (TRACE) committee works with providers and clients to honor client choice, accommodate client needs, and ensure accountability for decisions made by the system about client requests.

1C-6a 4. Any discrimination challenge is addressed through the TRACE policy. For instance, when a housing program submits a denial to Coordinated Entry, the priority list manager (PLM) will determine if the denial is within the scope of acceptable denial reasons and if it doesn't, the PLM will attempt to resolve the issue. If still unresolved, the TRACE committee will address the decision and a replacement referral will not be sent, and the referral and opening will be put on hold until TRACE can come to a resolution with the housing provider. Ultimately if there is still no resolution, the Governing Board of the CoC will make a final decision and all denials are recorded in detail and reported on to the CoC for funding purposes.

1C-7.	Public Housing Agencies within Your CoC's Geographic Area--New Admissions--General/Limited Preference--Moving On Strategy.	
	NOFO Section VII.B.1.g.	
	<p>You must upload the PHA Homeless Preference\PHA Moving On Preference attachment(s) to the 4B. Attachments Screen.</p> <p>Enter information in the chart below for the two largest PHAs highlighted in gray on the FY 2021 CoC-PHA Crosswalk Report or the two PHAs your CoC has a working relationship with--if there is only one PHA in your CoC's geographic area, provide information on the one:</p>	

Public Housing Agency Name	Enter the Percent of New Admissions into Public Housing and Housing Choice Voucher Program During FY 2021 who were experiencing homelessness at entry	Does the PHA have a General or Limited Homeless Preference?	Does the PHA have a Preference for current PSH program participants no longer needing intensive supportive services, e.g., Moving On?
Metropolitan Council	20%	No	Yes
Saint Paul Public Housing Agency	23%	Yes-Public Housing	Yes

1C-7a.	Written Policies on Homeless Admission Preferences with PHAs.	
	NOFO Section VII.B.1.g.	

	Describe in the field below:
1.	steps your CoC has taken, with the two largest PHAs within your CoC's geographic area or the two PHAs your CoC has working relationships with, to adopt a homeless admission preference—if your CoC only has one PHA within its geographic area, you may respond for the one; or
2.	state that your CoC has not worked with the PHAs in its geographic area to adopt a homeless admission preference.

(limit 2,500 characters)

1. The Saint Paul PHA has a general homeless preference policy that has been in place since 2019 and a "moving on policy" that is also implemented by the Metro HRA serving the non-Saint Paul areas of Ramsey County. The PHAs partner with the CoC to identify individuals and families ready to transition or "move up" from Permanent Supportive Housing (PSH) units. These are families that were homeless prior to entry into the PSH program and who continue to need a rental subsidy but no longer require intensive supportive services. The PHAs accepts referrals from the CoC's Coordinated Entry Program. Move-Up applicants must have a minimum of two years living in PSH, an ongoing source of income, paid rent on-time and in full every month for at least ten of the past twelve months and are connected to mainstream or community resources. Both the St. Paul PHA and Metropolitan Council HRA have active voting members on the CoC's Governing Board and Steering Committee and provide support to several work groups.

1C-7b.	Moving On Strategy with Affordable Housing Providers.	
	Not Scored—For Information Only	

Select yes or no in the chart below to indicate affordable housing providers in your CoC's jurisdiction that your recipients use to move program participants to other subsidized housing:

1.	Multifamily assisted housing owners	No
2.	PHA	Yes
3.	Low Income Housing Tax Credit (LIHTC) developments	No
4.	Local low-income housing programs	No
	Other (limit 150 characters)	
5.		

1C-7c.	Include Units from PHA Administered Programs in Your CoC's Coordinated Entry.	
	NOFO Section VII.B.1.g.	

In the chart below, indicate if your CoC includes units from the following PHA programs in your CoC's coordinated entry process?

1.	Emergency Housing Vouchers (EHV)	Yes
2.	Family Unification Program (FUP)	Yes
3.	Housing Choice Voucher (HCV)	Yes
4.	HUD-Veterans Affairs Supportive Housing (HUD-VASH)	Yes
5.	Mainstream Vouchers	Yes
6.	Non-Elderly Disabled (NED) Vouchers	No
7.	Public Housing	Yes
8.	Other Units from PHAs:	

1C-7d.	Submitting CoC and PHA Joint Applications for Funding for People Experiencing Homelessness.	
	NOFO Section VII.B.1.g.	

1.	Did your CoC coordinate with a PHA(s) to submit a competitive joint application(s) for funding or jointly implement a competitive project serving individuals or families experiencing homelessness (e.g., applications for mainstream vouchers, Family Unification Program (FUP), other programs)?	Yes
		Program Funding Source
2.	Enter the type of competitive project your CoC coordinated with a PHA(s) to submit a joint application for or jointly implement.	Family Unification Program

1C-7e.	Coordinating with PHA(s) to Apply for or Implement HCV Dedicated to Homelessness Including Emergency Housing Voucher (EHV).	
	NOFO Section VII.B.1.g.	

	Did your CoC coordinate with any PHA to apply for or implement funding provided for Housing Choice Vouchers dedicated to homelessness, including vouchers provided through the American Rescue Plan?	Yes
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1C-7e.1.	List of PHAs with Active MOUs to Administer the Emergency Housing Voucher (EHV) Program.	
	Not Scored—For Information Only	

	Does your CoC have an active Memorandum of Understanding (MOU) with any PHA to administer the EHV Program?	Yes
	If you select yes to question 1C-7e.1., you must use the list feature below to enter the name of every PHA your CoC has an active MOU with to administer the Emergency Housing Voucher Program.	
PHA		
This list contains no items		

1D. Coordination and Engagement Cont'd

1D-1.	Discharge Planning Coordination.	
	NOFO Section VII.B.1.h.	

Select yes or no in the chart below to indicate whether your CoC actively coordinates with the systems of care listed to ensure persons who have resided in them longer than 90 days are not discharged directly to the streets, emergency shelters, or other homeless assistance programs.

1. Foster Care	Yes
2. Health Care	Yes
3. Mental Health Care	Yes
4. Correctional Facilities	Yes

1D-2.	Housing First—Lowering Barriers to Entry.	
	NOFO Section VII.B.1.i.	

1.	Enter the total number of new and renewal CoC Program-funded PSH, RRH, SSO non-coordinated entry, Safe-Haven, and Transitional Housing projects your CoC is applying for in FY 2022 CoC Program Competition.	22
2.	Enter the total number of new and renewal CoC Program-funded PSH, RRH, SSO non-coordinated entry, Safe-Haven, and Transitional Housing projects your CoC is applying for in FY 2022 CoC Program Competition that have adopted the Housing First approach.	22
3.	This number is a calculation of the percentage of new and renewal PSH, RRH, SSO non-Coordinated Entry, Safe-Haven, and Transitional Housing projects the CoC has ranked in its CoC Priority Listing in the FY 2022 CoC Program Competition that reported that they are lowering barriers to entry and prioritizing rapid placement and stabilization to permanent housing.	100%

1D-2a.	Project Evaluation for Housing First Compliance.	
	NOFO Section VII.B.1.i.	

Describe in the field below:

1.	how your CoC evaluates every recipient—that checks Housing First on their Project Application—to determine if they are actually using a Housing First approach;
2.	the list of factors and performance indicators your CoC uses during its evaluation; and
3.	how your CoC regularly evaluates projects outside of the competition to ensure the projects are using a Housing First approach.

(limit 2,500 characters)

1D-2a.1: In this year's NOFO process, the CoC approved the adoption of the U.S. Interagency Council on Homelessness (USICH) Housing First Checklist: Assessing Projects and Systems for a Housing First Orientation in the Letter of Interest (LOI) online survey to further confirm that applicants are adhering in the core elements and principles of Housing First, beyond information gathered during annual monitoring visits or information provided by Coordinated Entry Priority List Managers who may be experiencing difficulty securing housing for a client where the housing provider is not following a Housing First approach, as they described in their NOFO application.

1D-2a.2: The following are the USICH Housing First Quick Screen questions that were embedded in the LOI survey for providers to answer: 1.) Are applicants allowed to enter the program without income? 2.) Are applicants allowed to enter the program even if they aren't "clean and sober" or "treatment compliant"? 3.) Are applicants allowed to enter the program even if they have criminal justice system involvement? 4.) Are service and treatment plans voluntary, such that tenants cannot be evicted for not following through? If an applicant does not answer "yes" to these four questions, they are not considered a Housing First program. The information from the LOI and Project Application are then compared to determine which projects are following the principles of Housing First.

1D-2a.3: The CoC evaluates projects annually during the monitoring process to confirm adherence to Housing First and other evidence-based best practices that they describe in their LOI and application (or if project-level performance issues arise between monitoring visits). During this process, project-level documents are shared (intake forms, policy review, grievance forms, etc.), and project-level HMIS system performance measures are reviewed to evaluate that the project is truly operating as a Housing First Model. Prior to the 2023 monitoring process, the CoC Evaluator will recommend to the CoC Governing Board for vote/approval of the inclusion of all the USICH Housing First Checklist question, as part of a pre-monitoring visit questionnaire for providers to complete to further document their adherence to Housing First.

1D-3.	Street Outreach–Scope.	
	NOFO Section VII.B.1.j.	

	Describe in the field below:
1.	your CoC's street outreach efforts, including the methods it uses to ensure all persons experiencing unsheltered homelessness are identified and engaged;
2.	whether your CoC's Street Outreach covers 100 percent of the CoC's geographic area;
3.	how often your CoC conducts street outreach; and
4.	how your CoC tailored its street outreach to persons experiencing homelessness who are least likely to request assistance.

(limit 2,500 characters)

- 1) The CoC's Street Outreach (SO) efforts include youth specific outreach, outreach for single adults, and outreach for families with dependent children. Cities throughout the county, in partnership with outreach teams, service providers, and emergency responders provide regular updates on known encampments to target outreach and services to those areas. Outreach teams have multiple drop-in times at various day centers and libraries throughout the week where people know they can find an outreach worker if they don't have a phone or reliable way to communicate. In St. Paul, the city's Homeless Assistance Response Team (HART) works across departments, service providers and government jurisdictions to integrate services and connect directly with unsheltered individuals. HART staff focus on the unique needs of each unsheltered resident and, utilizing available community resources, secure the appropriate shelter or housing options and services. HART and other outreach partners regularly visit encampments, building relationships and trust while balancing the provision of basic needs with more housing-focused problem-solving. HART and community outreach partners meet weekly where they share a by-name "registry" to coordinate assistance, set up long-term outreach services or re-engagement with outreach services.
- 2) The CoC's street outreach covers 100 percent of the CoC's geographic area.
- 3) Outreach is offered seven days per week for youth. In Saint Paul, HART staff are available 24/7 while other outreach providers operate Monday – Friday for adults and families.
- 4) Outreach teams visit encampments repeatedly to build relationships and trust and to increase the chance that staff is present at moments of readiness for change or assistance. Teams also bring popular services to encampments including on-site mental health assessments and medical interventions to address health and wellness issues; assistance to navigate supports related to domestic abuse and violence, and sexual exploitation; Veteran-specific resources; assisting individuals with animals to prepare for shelter readiness (e.g., spay-neuter programs, certify companion animals); and in the event of an encampment closure due to health and safety concerns, HART ensures that personal belongings will be stored.

1D-4.	Strategies to Prevent Criminalization of Homelessness.	
	NOFO Section VII.B.1.k.	

Select yes or no in the chart below to indicate strategies your CoC implemented to ensure homelessness is not criminalized and to reverse existing criminalization policies in your CoC's geographic area:

	Ensure Homelessness is not Criminalized	Reverse Existing Criminalization Policies
1. Engaged/educated local policymakers	Yes	Yes
2. Engaged/educated law enforcement	Yes	Yes
3. Engaged/educated local business leaders	Yes	Yes
4. Implemented community wide plans	Yes	Yes
5. Other:(limit 500 characters)		

5) HART staff has changed St. Paul's approach to encampments. The City Attorney must sign off on any encampment closure; closures are posted a week in advance; every provider is invited to offer services and prepare individuals for housing. Storage and transportation are offered, all possible options that lead out of camping are considered. Client choice drives the engagement with a goal of having people leave the encampment to a better place – even if housing isn't yet available.	Yes	Yes
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1D-5.	Rapid Rehousing–RRH Beds as Reported in the Housing Inventory Count (HIC).	
	NOFO Section VII.B.1.I.	

		2021	2022
	Enter the total number of RRH beds available to serve all populations as reported in the HIC—only enter bed data for projects that have an inventory type of "Current."	472	487

1D-6.	Mainstream Benefits—CoC Annual Training of Project Staff.	
	NOFO Section VII.B.1.m.	

Indicate in the chart below whether your CoC trains program staff annually on the following mainstream benefits available for program participants within your CoC's geographic area:

	Resource	CoC Provides Annual Training?
1.	Food Stamps	Yes
2.	SSI—Supplemental Security Income	Yes
3.	TANF—Temporary Assistance for Needy Families	Yes
4.	Substance Abuse Programs	Yes
5.	Employment Assistance Programs	Yes
6.	Other (limit 150 characters)	

1D-6a.	Information and Training on Mainstream Benefits and Other Assistance.	
	NOFO Section VII.B.1.m	

Describe in the field below how your CoC:

1.	systemically provides up-to-date information on mainstream resources available for program participants (e.g., Food Stamps, SSI, TANF, substance abuse programs) within your CoC's geographic area;
2.	works with project staff to collaborate with healthcare organizations, including substance abuse treatment and mental health treatment, to assist program participants with receiving healthcare services; and
3.	works with projects to promote SSI/SSDI Outreach, Access, and Recovery (SOAR) certification of program staff.

(limit 2,500 characters)

1)Program participants can access up-to-date information about mainstream resources through two online resources that are updated daily by staff at the Suburban Ramsey Family Collaborative - one is a basic needs resource directory and the other focuses on jobs and training opportunities for youth and adults. These resources are shared widely with CoC partners. Information is also shared through email, newsletters, and regular CoC meetings. In St. Paul, people access information about mainstream benefits at the St. Paul Opportunity Center (SPOC) which includes County financial workers. Other partners at SPOC connect people with healthcare and mental health services.

2)Healthcare organizations play an active role in the CoC and in the field. Multiple times a week, the street outreach teams are accompanied by health care staff who can provide on-the-spot mental and chemical health assessments, provide basic healthcare, and set up appointments for future care. Higher Ground Saint Paul, operated by Catholic Charities, is the primary day space and shelter operating in the Continuum and is home to a full-service health clinic operated by Minnesota Community Care (the local Healthcare for the Homeless organization in Ramsey County). The clinic offers Primary, Acute, and Preventative Care from 9am-4:30pm daily, daily Psychiatry from 9am-4pm; daily Dental Care (Extractions only, 8:30am-3:30pm); Pharmacist (Tues & Fri 9am-3pm); Chemical Health Counseling (10am- 4pm Tues & Wed, Mon & Thurs 1-4pm); Mental Health Counseling (Psychologist: Mondays 9AM-4PM and Thursdays 1-4PM; Therapist: Mon, Tues, Friday 9AM-3PM, Wed and Thurs 9AM-2PM), Acupuncture (Wed. 10am-12pm) and Optometrist and Optician (Thurs. 9am-3:30pm.) Ramsey County partners with M Health Fairview to bring nursing services into a family shelter and two hotel sites that transition people from unsheltered living to a housing placement. In addition, CoC funded projects collaborate with Ramsey County Financial Assistance Assessors to assist program participants in enrolling in health insurance.

3)The CoC is currently served by several SOAR certified program staff located in three agencies. In the coming year, another department at the County will pursue certification and the CoC will share information in the newsletter and at provider forums to encourage additional certifications.

1D-7.	Increasing Capacity for Non-Congregate Sheltering.	
	NOFO Section VII.B.1.n.	

Describe in the field below how your CoC is increasing its capacity to provide non-congregate sheltering.

(limit 2,500 characters)

In the past year, the CoC has increased its capacity to provide non-congregate sheltering based on successes from the COVID response and feedback from shelter guests and others with lived experience.

Ramsey County, the City of Saint Paul, Minnesota, and many nonprofit and community partners worked quickly to provide and sustain shelter and support services using COVID-19 emergency funds. In 2021, partners added 450 “new beds” to the system, serving 1,355 people (unduplicated). From these beds, providers have assisted 520 individuals with finding housing, with more than half placed in Housing Support, a mainstream benefit that covers rent and services. Acknowledging that COVID-19 crisis funding was ending and hearing from the individuals with lived experience who said that the COVID response was effective, CoC partners created a shelter working group focused on how to maintain service-rich, non-congregate approaches. Two key solutions emerged: Ramsey County Housing Stability Department developed an innovative Emergency Rental Assistance-based program called Highway to Housing (H2H). Partnering with local hotels and a shelter with non-congregate rooms, H2H made available 80 rooms for single men, women and couples experiencing homelessness. H2H supports housing-ready people from congregate shelters or encampments, by providing individual rooms with intensive housing search supports. H2H’s goal is to successfully locate 80% of households into housing; with households spending no more than 60 days in the program before entering permanent housing.

CoC partners successfully lobbied for additional state resources, receiving more than \$6M, to advance: a) Project Home family shelter with 100 non-congregant beds, 9 of which are set aside to support single women; b) Catholic Charities Enhanced Shelter that includes 32 non-congregate beds and a model in which elders and other highly vulnerable individuals receive more intensive supportive services including housing placement and behavioral health supports; and c) More Doors, a new black, women-owned organization, will add 40 new/additional non-congregate rooms at scattered site properties.

ID-8.	Partnerships with Public Health Agencies—Collaborating to Respond to and Prevent Spread of Infectious Diseases.	
	NOFO Section VII.B.1.o.	
	Describe in the field below how your CoC effectively collaborates with state and local public health agencies to:	
1.	develop CoC-wide policies and procedures to respond to infectious disease outbreaks; and	
2.	prevent infectious disease outbreaks among people experiencing homelessness.	

(limit 2,500 characters)

1.The Ramsey County and Saint Paul Department of Public Health (PH) serves as the conduit of CDC guidelines as they apply to the county and its work through the CoC. During the rise and peak of the COVID-19 pandemic, the county activated the Public Health Incident Command System (ICS) which was responsible for much of the success of the public health response regarding disease transmission and vaccinations. PH assists the CoC with policies and procedures that stem from infectious disease outbreaks and they work alongside providers and people experiencing homelessness to implement specific procedures to prevent or treat illness (e.g., quarantine spaces, sanitation, PPE, vaccinations, etc.).

2.To prevent infectious disease outbreaks, the Saint Paul -Ramsey County Department of Public Health (PH) provides weekly health clinics at shelter and respite sites and regularly visits encampments with outreach and other medical staff to provide information, offer vaccination clinics (COVID boosters and flu shots), and distribute PPE. PH has partnered with community organizations to provide culturally and linguistically appropriate information and resources about COVID-19 vaccines.

ID-8a.	Collaboration With Public Health Agencies on Infectious Diseases.	
	NOFO Section VII.B.1.o.	
	Describe in the field below how your CoC effectively equipped providers to prevent or limit infectious disease outbreaks among program participants by:	
1.	sharing information related to public health measures and homelessness, and	
2.	facilitating communication between public health agencies and homeless service providers to ensure street outreach providers and shelter and housing providers are equipped to prevent or limit infectious disease outbreaks among program participants.	

(limit 2,500 characters)

1.The Saint Paul -Ramsey County Department of Public Health (PH) plays a critical role in sharing information and providing assistance to the CoC's service providers. PH provides weekly health clinics at shelters and respite sites and has served as the conduit for implementation of CDC guidelines. PH regularly shares information and strategies to protect those experiencing homelessness. Since March 2020, the Minnesota Interagency Council on Homelessness convenes a weekly statewide webinar that attracts 80-120 people including providers and people experiencing homelessness. The webinars share critical information and resources about COVID-19 and continue to focus on public health with weekly updates from state epidemiologists. A staffer from the COVID-19 unit at MDH gained an HMIS read-only license during the pandemic to support the COVID-19 response in homeless service settings. This user searches for people with positive COVID-19 cases who reported residing in shelter to identify outbreaks and ensure shelters have the resources they need to respond to cases. The HMIS administrator developed a system for information sharing regarding Covid-19 suspected and confirmed cases via HMIS, including a report for agencies using HMIS to do vector contact tracing within the system. HMIS and other public health entities partnered to track the extent to which people experiencing homelessness are accessing the COVID-19 vaccine. Information from the match is used by MDH to monitor trends and identify disparities in vaccine uptake, and target outreach to underserved sub-populations. This partnership began in 2020 and is ongoing.

2.The CoC facilitated communication and activity between public health agencies and homeless service providers. PH gives information sessions on Covid-19 vaccinations and coordinates vaccination clinics for residents and staff. PH coordinated weekly health clinics for shelters, manages the nursing contract, at respite facilities, and supplies PPE to all shelters and respite sites. The PH Medical Director also facilitated trainings for Narcan administration and AED operations. PH frequently accompanies outreach teams to encampments where they provide information, vaccinations, and PPE to those staying outside. The Minnesota Department of Health (MDH) has recently created an incident command center to respond to Monkeypox outbreaks and HIV-focused response in the Metro that's focused on connections to encampments.

1D-9.	Centralized or Coordinated Entry System—Assessment Process.	
	NOFO Section VII.B.1.p.	
	Describe in the field below how your CoC's coordinated entry system:	
1.	covers 100 percent of your CoC's geographic area;	
2.	uses a standardized assessment process; and	
3.	is updated regularly using feedback received from participating projects and households that participated in coordinated entry.	

(limit 2,500 characters)

- 1) The CoC's Coordinated Entry System covers 100 percent of the CoC's geographic area.
- 2) The CoC uses a standardized assessment process which was developed using best practices and coordinated with other CoCs in the Twin Cities metro. To ensure consistency in the administration of the Coordinated Entry Assessment, agencies interested in providing assessments must complete an application process and individuals must complete foundational training, receive certification and attend an annual refresher training. New assessors must shadow certified assessors and complete an assessment with them to receive feedback. Eligibility criteria, which is spelled out in the regularly updated Coordinated Entry Policy Manual guides assessors around who can be assessed. Individuals and families who are newly homeless or do not meet the CE eligibility criteria, will be referred to mainstream resources by the CoC Assessors.
- 3) The CoC has an active Coordinated Entry committee that reviews project and household feedback on a regular basis to update the CoC's Coordinated Entry Policy Manual and the assessment tool. The current assessment process was updated on August 1, 2022 to address policy changes, including:
 - ¿ Under Eligibility, the workgroup is removing those who are first time HUD homeless from being assessed for single adults, ages 25 and older only (this does not impact the youth or families with dependent children or those fleeing or attempting to flee domestic violence)
 - ¿ Under the transfer between programs process, expanding the list of who to request a transfer form from to include priority list managers (PLM's), assessors, and navigators
 - ¿ Under the TRACE responsibilities (Transfers, reviews and accommodations in Coordinated Entry), change that the TRACE committee must respond to requests within 5 business days (instead of 7) – this aligns with the PLM's needing to respond to housing provider requests of an eligible referral from the priority list
 - ¿ Under grievances and ongoing reviews of policy changes, the CE workgroup will review and update annually.

1D-9a.	Program Participant-Centered Approach to Centralized or Coordinated Entry.	
	NOFO Section VII.B.1.p.	
	Describe in the field below how your CoC's coordinated entry system:	
1.	reaches people who are least likely to apply for homeless assistance in the absence of special outreach;	
2.	prioritizes people most in need of assistance;	
3.	ensures people most in need of assistance receive permanent housing in a timely manner, consistent with their preferences; and	
4.	takes steps to reduce burdens on people using coordinated entry.	

(limit 2,500 characters)

- 1) The CoC's CES reaches people who are least likely to apply for homeless assistance by having certified, trained assessors employed by a variety of agencies. The assessors have interactions with individuals at a variety of different places - libraries, encampments, day centers, emergency shelters, and other locations. Assessors use person-centered, trauma-informed approaches to interact with people.
- 2) The CoC's prioritization process ensures that people most in need of assistance access housing first. First, households are prioritized by homeless status (Chronic Homeless, Long Term Homeless (LTH), HUD Homeless/ Literally Homeless, Runaway Homeless Youth (RHY) - youth only, Minnesota Homeless, At imminent risk of homelessness.) For all clients with the same homeless status, the reported length of time homeless is prioritized. If two households have identical priority based on the criteria listed above, and one household is a Veteran household and the other is not, the Veteran household is prioritized over the non-Veteran household.
- 3) In order to ensure that people in the most need of assistance receive permanent housing in a timely manner, the CoC funds housing navigators to work with households on the coordinated entry list for unaccompanied youth (Salvation Army), single adults (Hearth Connection) and for families with dependent children (Catholic Charities – Coordinated Access to Housing and shelter). The housing navigators ensure households have documentation and required state identification to be move-in ready once their name is prioritized on the coordinated entry priority list.
- 4) The CoC has taken the following steps to reduce burdens on people using Coordinated Entry (CE) by training assessors, reviewing and updating the CE Policy Manual, and creating public materials to better educate the community, including people experiencing homelessness in accessing CE. The CE Workgroup updated the policy manual to further clarify processes, especially around program transfer requests and addressing client complaints of the CES in Ramsey County.

1D-10.	Promoting Racial Equity in Homelessness—Conducting Assessment.	
	NOFO Section VII.B.1.q.	

1.	Has your CoC conducted a racial disparities assessment in the last 3 years?	Yes
2.	Enter the date your CoC conducted its latest assessment for racial disparities.	07/01/2022

1D-10a.	Process for Analyzing Racial Disparities—Identifying Racial Disparities in Provision or Outcomes of Homeless Assistance.	
	NOFO Section VII.B.1.q.	

	Describe in the field below:
1.	your CoC's process for analyzing whether any racial disparities are present in the provision or outcomes of homeless assistance; and
2.	what racial disparities your CoC identified in the provision or outcomes of homeless assistance.

(limit 2,500 characters)

1D-10a.1: The CoC uses current HMIS data that is disaggregated by race and ethnicity throughout the year in all meetings to monitor if racial disparities are present in homeless system access, provisions, and outcomes. These data are further used to support decision-making processes for service system enhancements or new initiatives to address any racial disparities, if applicable. Additionally, the CoC's biannual needs assessment provides a system-wide analysis that focuses on disparities in access, provisions, and outcomes. This report is presented to the CoC Governing Board where recommendations are provided to CoC leadership to address disparities found in the analysis.

1D-10a.2: Moving beyond simply comparing our CoC's estimated U.S. Census and HMIS data, our CoC compares the likelihood of people becoming homeless by race and ethnicity. The CoC's 2022 Needs Assessment found that when comparing people of color to their white peers experiencing homelessness: American Indians are fourteen times more likely; African Americans are eight times more likely; Multiple Races are three times more likely; and Latinx are twice as likely to become homeless compared to whites in Ramsey County. Additionally, this needs assessment found the following disparities:

¿ American Indians are returning to homelessness within six months of exiting from permanent supportive housing and other permanent housing at a higher rate (21.5%) than Whites (14.8%).

¿ In 2021, African Americans used homeless prevention programs at a much higher rate (63.6%) than Whites (19.3%), a disparity greater than the total population in shelters or street outreach.

¿ The rate of exiting from CoC housing programs to another permanent housing destination is much worse for people that identify as Multiracial (49.1%) and American Indian (46.6%) than White (63.7%). African Americans have the highest rate of all racial and ethnic groups for exiting to permanent housing destinations (67%)

1D-10b.	Strategies to Address Racial Disparities.	
	NOFO Section VII.B.1.q.	

Select yes or no in the chart below to indicate the strategies your CoC is using to address any racial disparities.

1.	The CoC's board and decisionmaking bodies are representative of the population served in the CoC.	Yes
2.	The CoC has identified steps it will take to help the CoC board and decisionmaking bodies better reflect the population served in the CoC.	Yes
3.	The CoC is expanding outreach in geographic areas with higher concentrations of underrepresented groups.	Yes
4.	The CoC has communication, such as flyers, websites, or other materials, inclusive of underrepresented groups.	Yes
5.	The CoC is training staff working in the homeless services sector to better understand racism and the intersection of racism and homelessness.	Yes
6.	The CoC is establishing professional development opportunities to identify and invest in emerging leaders of different races and ethnicities in the homelessness sector.	No
7.	The CoC has staff, committees, or other resources charged with analyzing and addressing racial disparities related to homelessness.	Yes
8.	The CoC is educating organizations, stakeholders, boards of directors for local and national nonprofit organizations working on homelessness on the topic of creating greater racial and ethnic diversity.	Yes

9.	The CoC reviewed coordinated entry processes to understand their impact on people of different races and ethnicities experiencing homelessness.	Yes
10.	The CoC is collecting data to better understand the pattern of program use for people of different races and ethnicities in its homeless services system.	Yes
11.	The CoC is conducting additional research to understand the scope and needs of different races or ethnicities experiencing homelessness.	Yes
	Other:(limit 500 characters)	
12.		

1D-10c.	Actions Taken to Address Known Disparities.	
	NOFO Section VII.B.1.q.	

Describe in the field below the steps your CoC and homeless providers have taken to address disparities identified in the provision or outcomes of homeless assistance.

(limit 2,500 characters)

1D-10c: The 2022 CoC Needs Assessment recommends that the CoC Steering Committee should convene all Permanent Supportive Housing (PSH) and Other Permanent Housing (OPH) programs to understand what is creating the disparities in exits from these programs. Additionally, as part of the 2023 project monitoring process, all PSH and OPH will be monitored to track the progress in reducing the disparities that were found in the needs assessment analysis. The needs assessment also found that African Americans use homeless prevention at a much higher rate than whites. The needs assessment recommends that the CoC conduct an analysis as to determine which zip codes in the community are fueling this disparity to develop a plan for more community engagement with key stakeholders (i.e., landlords, faith-based organizations, neighborhood groups, food shelves, and other non-profits, etc.). Currently, the CoC is monitoring these disparities by using HMIS data disaggregated by race for planning and evaluation purposes. Additionally, the CoC Executive Director will be meeting with racial equity consultants to develop a plan to address the disparities uncovered in the needs assessment.

1D-10d.	Tracking Progress on Preventing or Eliminating Disparities.	
	NOFO Section VII.B.1.q.	

Describe in the field below the measures your CoC has in place to track progress on preventing or eliminating disparities in the provision or outcomes of homeless assistance.

(limit 2,500 characters)

The CoC planning and evaluation staff track disparities for the point-in-time-counts, homeless in shelters and street outreach over the prior 12 months, and those served by prevention. The racial composition of our annual homeless counts is then compared to the general population (Ramsey County demographics). The resulting disparities in terms of the likelihood of being homeless within the CoC region are regularly presented to the Governing Board, Steering Committees, and workgroups and posted quarterly on a public dashboard. All workgroups are designed with a framework that includes “workgroup charge,” “strategic priority alignment,” and “related data.” Racial composition and disparities are standard components of all CoC working groups and committees, including outcome disparities in terms of households in coordinated entry, exits to permanent destinations, and returns to homelessness. Work groups develop strategies based on this data to address disparities. Staff analyze the outcomes by race in the biennial homeless Needs Assessment that inform recommendations to the Steering Committee and Governing Board.

Leading the HHR workgroups through a racial equity lens has been instrumental in recent collaboration priorities such as the sheltered workgroup priority to support a single point of entry and to support increased wrap-around services model. Historic data demonstrates that BIPOC communities are disadvantaged in terms of uptake or access to government benefits and community resources. By creating a single point of entry- the CoC is attempting to demonstrate equity building- whereas strategies will ensure that all people regardless of race, ethnicity, primary language, ability, and sexual orientation will truly have equal opportunities to access shelters. Furthermore, by building wrap-around service models and connecting individuals to culturally specific providers, the CoC community is then saying “bring resources to those in shelter and then the length of stays in shelter will decrease.”

1D-11.	Involving Individuals with Lived Experience of Homelessness in Service Delivery and Decisionmaking—CoC's Outreach Efforts.	
	NOFO Section VII.B.1.r.	
<div>Describe in the field below your CoC's outreach efforts (e.g., social media announcements, targeted outreach) to engage those with lived experience of homelessness in leadership roles and decision making processes.</div>		

(limit 2,500 characters)

CoC staff deploy multiple outreach strategies to engage those with lived experience in the CoC's decision-making processes. Each year, the CoC holds two community-wide full membership meetings where participant input helps to shape work group priorities and strategic focus. CoC staff work with provider partners from shelters, advocacy groups, and street outreach to invite people currently experiencing homelessness to these meetings to provide input and feedback. Individuals are compensated for their time participating in these meetings. Individuals with lived experience are invited and encouraged to participate in working groups - to offer their insights on what strategies have been most helpful or harmful and to suggest system improvements. CoC staff visit encampments, shelters, and other service sites to solicit feedback that is used to inform program implementation. The CoC also engages Freedom from The Streets - a nonprofit staffed and directed by people who have experienced or are experiencing homelessness. Individuals from Freedom from the Streets are active participants in CoC workgroups that ultimately make policy and funding recommendations to the CoC's Governing Board. In 2022, the CoC recruited a Youth Advisory Board, bringing the voices of youth experiencing homelessness to the CoC table. The CoC worked with school districts, individual schools, and youth providers to engage interested youth who are being compensated with stipends for their participation. Ramsey County Housing Stability Department staff are mentoring these youth to help them more vocally share their needs and recommendations to the CoC and county.

1D-11a.	Active CoC Participation of Individuals with Lived Experience of Homelessness.	
	NOFO Section VII.B.1.r.	

Enter in the chart below the number of people with lived experience who currently participate in your CoC under the five categories listed:

	Level of Active Participation	Number of People with Lived Experience Within the Last 7 Years or Current Program Participant	Number of People with Lived Experience Coming from Unsheltered Situations
1.	Included and provide input that is incorporated in the local planning process.	15	10
2.	Review and recommend revisions to local policies addressing homelessness related to coordinated entry, services, and housing.	7	5
3.	Participate on CoC committees, subcommittees, or workgroups.	5	3
4.	Included in the decisionmaking processes related to addressing homelessness.	2	2
5.	Included in the development or revision of your CoC's local competition rating factors.	2	2

1D-11b.	Professional Development and Employment Opportunities for Individuals with Lived Experience of Homelessness.	
	NOFO Section VII.B.1.r.	

Describe in the field below how your CoC or CoC membership organizations provide professional development and employment opportunities to individuals with lived experience of homelessness.

(limit 2,500 characters)

Several CoC member organizations provide employment opportunities to people with lived experience in various capacities. Outreach and mental health agencies (Radian Health, People Incorporated) have embedded Certified Peer Specialists on teams. These individuals are able to deeply connect with individuals experiencing homelessness given their understanding and past experiences. Several shelter staff and housing navigation providers are also individuals with lived experience. Lutheran Social Services provides paid internship opportunities at their program and through trusted community partners. They teach skill development through a Youth Leadership Team, Independent Living Skills classes, connections to our internal employment services and external partners and one on one case management services. Additionally, they hire, support and value folks with lived experience and accept lived experience in lieu of formal education when applying for open positions at their programs. The organization has numerous staff with lived experience of homelessness, including in positions of leadership. County workforce services assist individuals by assessing them for employment programs that require enrollment and help with job search questions, resume writing, interview help, etc. Lastly, Union Gospel Mission, which provides shelter, housing and programming, has an adult education program to help individuals secure a living wage or prepare themselves for more productive opportunities. Our adult education boasts an average wage of \$19.23 for individuals in our career services program, which helps broaden prospects for locating and maintaining more typical housing arrangements. They support individuals enrolling in post-secondary education with an endowed scholarship and train for placement in high-needs fields.

1D-11c.	Routinely Gathering Feedback and Addressing Challenges of Individuals with Lived Experience of Homelessness.	
	NOFO Section VII.B.1.r.	
	Describe in the field below how your CoC:	
	1. how your CoC routinely gathered feedback from people experiencing homelessness and people who have received assistance through the CoC or ESG program on their experience receiving assistance; and	
	2. the steps your CoC has taken to address challenges raised by people with lived experience of homelessness	

(limit 2,500 characters)

1.The CoC routinely gathers feedback from people receiving assistance and those with lived experience through surveys and focus groups and during Consumer Forums at bi-annual CoC meetings and at several Governing Board and Steering Committee meetings throughout the year. These forums provide decision makers and program managers with insights from people currently accessing services about what is working well and what areas need improvement. Providers also engage clients and share their perspectives as part of CoC meetings. Working alongside young people, youth providers help them advocate and represent their perspectives at meetings.

2.Challenges raised by people with lived experience have led to multiple program, procedural, and funding shifts. Feedback from those who are unsheltered has led outreach and safety teams to modify encampment closure protocols by providing more notice, starting later in the day, and ensuring that transportation and storage are available. In the past year, the CoC has conducted extensive engagement with individuals transitioning from unsheltered and congregate shelter environments into more service-intensive, non-congregate settings. This engagement has led to an evolving shelter and service model that is focused on providing stability (i.e., non-lottery, non-congregate accommodations) and then providing them with the services and supports needed to more quickly access housing.This engagement led to successful fundraising to meet the expressed needs of these individuals, including options for couples, benefits navigation, and non-congregate options. The Coordinated Entry work group has addressed client feedback around opaque processes and confusing language to develop better communications tools. The CoC's primary youth provider views youth as experts and integrates their suggestions into programs, whenever there is not a conflict with licensing and other regulatory bodies. Feedback is collected through exit interviews, quarterly client satisfaction surveys and regular house meetings and is reviewed by staff and leadership. Members of the CoC established Youth Advisory Board advise the CoC on the need for additional youth shelter capacity and housing for pregnant or parenting youth - and their needs for healthcare.

1D-12.	Increasing Affordable Housing Supply.	
	NOFO Section VII.B.1.t.	
	Describe in the field below at least 2 steps your CoC has taken in the past 12 months that engage city, county, or state governments that represent your CoC's geographic area regarding the following:	
1.	reforming zoning and land use policies to permit more housing development; and	
2.	reducing regulatory barriers to housing development.	

(limit 2,500 characters)

1.The CoC regularly works with city, county, and regional governments and the local housing and planning staff are members of the Steering Committee and lead the CoC's Increasing Housing Supply workgroup and the House America initiative. The CoC's Governing Board adopted 2 policies in order to encourage more housing development, particularly for the lowest income households, including: a) prioritizing new federal funding for permanent housing opportunities for those transitioning out of shelter and b) supporting studies on inclusionary zoning, land value tax and other incentives/requirements to produce/preserve affordable housing.

2.To minimize regulatory barriers facing housing development, the CoC partners with cities who are implementing new policies. St. Paul's rent stabilization ordinance went into effect in May 2022 and key provisions (as amended) include limiting rent increases to 3% in any 12-month period (or up to 8% based on documented expenses) and a new just cause eviction provision. In October 2021, St. Paul adopted the elimination of minimum parking requirements helping to lower development costs per unit. In the suburbs, Roseville updated its zoning code to allow for Accessory Dwelling Units (ADUs), to decrease required single family lot sizes, and to allow for high density residential in commercial areas. Shoreview now requires that a developer constructing or renovating a 20+unit building must make 10% of units affordable at 80% AMI, 7.5% at 60%AMI, and 5% at 50%AMI. Importantly, with reformed zoning, reduced barriers, and increased federal funding, within the CoC geography, we have increased PSH and housing affordable to those at 30% AMI or less from 12 units during the baseline period of 1/1/2019-3/30/20 to 508 units funded between 10/1/2021 – 12/31/2022.

1E. Project Capacity, Review, and Ranking–Local Competition

HUD publishes resources on the HUD.gov website at CoC Program Competition to assist you in completing the CoC Application. Resources include:

- Notice of Funding Opportunity (NOFO) for Fiscal Year (FY) 2022 Continuum of Care Competition and Noncompetitive Award of Youth Homeless Demonstration Program Renewal and Replacement Grants;
- 24 CFR part 578;
- FY 2022 CoC Application Navigational Guide;
- Section 3 Resources;
- PHA Crosswalk; and
- Frequently Asked Questions

1E-1.	Web Posting of Your CoC's Local Competition Deadline–Advance Public Notice.	
	NOFO Section VII.B.2.a. and 2.g.	
	You must upload the Local Competition Deadline attachment to the 4B. Attachments Screen.	

	Enter the date your CoC published the deadline for project applicants to submit their applications to your CoC's local competition.	09/16/2022
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1E-2.	Project Review and Ranking Process Your CoC Used in Its Local Competition. We use the response to this question and the response in Question 1E-2a along with the required attachments from both questions as a factor when determining your CoC's eligibility for bonus funds and for other NOFO criteria below.	
	NOFO Section VII.B.2.a., 2.b., 2.c., and 2.d.	

You must upload the Local Competition Scoring Tool attachment to the 4B. Attachments Screen.

Select yes or no in the chart below to indicate how your CoC ranked and selected project applications during your local competition:

1.	Established total points available for each project application type.	Yes
2.	At least 33 percent of the total points were based on objective criteria for the project application (e.g., cost effectiveness, timely draws, utilization rate, match, leverage), performance data, type of population served (e.g., DV, youth, Veterans, chronic homelessness), or type of housing proposed (e.g., PSH, RRH).	Yes
3.	At least 20 percent of the total points were based on system performance criteria for the project application (e.g., exits to permanent housing destinations, retention of permanent housing, length of time homeless, returns to homelessness).	Yes
4.	Provided points for projects that addressed specific severe barriers to housing and services.	Yes
5.	Used data from comparable databases to score projects submitted by victim service providers.	Yes

1E-2a.	Scored Project Forms for One Project from Your CoC's Local Competition. We use the response to this question and Question 1E-2. along with the required attachments from both questions as a factor when determining your CoC's eligibility for bonus funds and for other NOFO criteria below.	
	NOFO Section VII.B.2.a., 2.b., 2.c., and 2.d.	

You must upload the Scored Forms for One Project attachment to the 4B. Attachments Screen.

Complete the chart below to provide details of your CoC's local competition:

1.	What were the maximum number of points available for the renewal project form(s)?	45
2.	How many renewal projects did your CoC submit?	28
3.	What renewal project type did most applicants use?	PH-PSH

1E-2b.	Addressing Severe Barriers in the Local Project Review and Ranking Process.	
	NOFO Section VII.B.2.d.	

Describe in the field below:

1.	how your CoC collected and analyzed data regarding each project that has successfully housed program participants in permanent housing;
2.	how your CoC analyzed data regarding how long it takes to house people in permanent housing;
3.	how your CoC considered the specific severity of needs and vulnerabilities experienced by program participants preventing rapid placement in permanent housing or the ability to maintain permanent housing when your CoC ranked and selected projects; and
4.	considerations your CoC gave to projects that provide housing and services to the hardest to serve populations that could result in lower performance levels but are projects your CoC needs in its geographic area.

(limit 2,500 characters)

1E-2b.1: HMIS data was collected and analyzed from the previous 12-month grant period to determine the percent of participants who maintained housing stability within 180 days of entering the housing program and the percentage of all exited participants with a permanent destination with who reappear in the statewide homeless continuum with a homeless status within 6 months of their exit.

1E-2b.2: The CoC has developed a Coordinated Entry Dashboard that provides quarterly data on how long people are waiting to receive a referral and secure housing. These data are actively used for strategic planning purposes and to monitor the effectiveness of Coordinated Entry; however, CoC did not score and rank projects on how long it takes to house people in permanent housing.

1E-2b.3: The CoC took into consideration the specific severity of needs and vulnerabilities experienced by program participants gleaned from project monitoring visits in the spring of 2022, as it compared to project performance measures gathered from HMIS for scoring and ranking purposes.

1E-2b.4: Per monitoring visits that were conducted in the spring of 2022, most if not all housing projects that applied for renewal faced challenges relating to an increase in mental health and other behavioral health support services needed for their participants that may have impacted some scoring performance measures. The CoC Evaluator shared the challenges that applicants faced during their previous grant cycle with the CoC Ranking Committee for consideration, as they reviewed the outcomes of all projects scores and priority list ranking.

1E-3.	Promoting Racial Equity in the Local Competition Review and Ranking Process.	
	NOFO Section VII.B.2.e.	
	Describe in the field below:	
1.	how your CoC obtained input and included persons of different races, particularly those over-represented in the local homelessness population;	
2.	how the input from persons of different races, particularly those over-represented in the local homelessness population, affected how your CoC determined the rating factors used to review project applications;	
3.	how your CoC included persons of different races, particularly those over-represented in the local homelessness population, in the review, selection, and ranking process; and	
4.	how your CoC rated and ranked projects based on the degree to which their project has identified any barriers to participation (e.g., lack of outreach) faced by persons of different races and ethnicities, particularly those over-represented in the local homelessness population, and has taken or will take steps to eliminate the identified barriers.	

(limit 2,500 characters)

1E-3.1: The CoC utilized information gathered from the 2022 CoC needs assessment, recent homeless services evaluation reports, and feedback received from people with lived experience who have participated in CoC panels, workgroups, onsite interviews at encampments and shelters to help advice decision-making around racial (and gender) equity during the ranking process.

Additionally, the composition of the CoC committees is representative of the homeless population based on race and ethnicity. Throughout the year, input is shared by BIPOC CoC members about strategic planning and prioritization of services.

1E-3.2: The CoC's voting members are representative of the homeless population by race and ethnicity. The CoC Evaluator is a person of color, he is tasked every year with reviewing the most recently published NOFO and revises the NOFO Scoring Tool based on the HUD priority areas and other measures that are specific to the CoC's strategic goals. The Evaluator presents the revised scoring tool to the CoC to explain revisions or answer any questions regarding the tool. Voting members are then tasked with declining or approving the tool.

1E-3.3 The CoC Ranking Committee is composed of people with lived experience of homelessness and BIPOC CoC members. They are provided a link to the CoC Google Drive and instructed to review all the documents applicable to the NOFO ranking and scoring process. The CoC Evaluator further presents information gleaned from the most recent monitoring visits, needs assessment recommendations, and a summary of final scores of projects who applied for CoC funding.

1E-3.4 There are five questions within the NOFO letter of interest survey that are designed to see how each project has completed an agency-wide racial equity training and how each project is operationalizing racial equity at the systems-level and organizationally. It is here where ranking committee members gather information on how each applicant identifies systemic barriers (both within and outside of the CoC) and explains the sets that they have taken or plan to take to reduce any inequitable barrier.

1E-4.	Reallocation—Reviewing Performance of Existing Projects.	
	NOFO Section VII.B.2.f.	
	Describe in the field below:	
1.	your CoC's reallocation process, including how your CoC determined which projects are candidates for reallocation because they are low performing or less needed;	
2.	whether your CoC identified any projects through this process during your local competition this year;	
3.	whether your CoC reallocated any low performing or less needed projects during its local competition this year; and	
4.	why your CoC did not reallocate low performing or less needed projects during its local competition this year, if applicable.	

(limit 2,500 characters)

1E-4.1: Yearly, the CoC reviews projects that score 60% or below on the eligible points per their project to determine which projects should be flagged for reallocation, except for new projects. This year only one project fell below the 60% threshold, although this project was scored and ranked as a new project due to delays in construction and renovation and they did not have one year of HMIS data considering the delays in starting their project.

1E-4.2: The CoC did not identify any projects this year which could be subject to reallocation.

1E-4.3: The CoC did not identify any projects this year which could be subject to reallocation due to low performance and or less need in the CoC's infrastructure of projects.

1E-4.4: The CoC, and specifically the CoC Evaluator, took into consideration findings from NOFO project monitoring visits conducted in the spring of 2022 that have impacted project performance. These findings consist of but are not limited to sustained impact of COVID-19 on staffing (i.e., turnover and hiring); influx of other funding streams for rental assistance which impacted project budgetary spending; and the longstanding affordable housing crisis where we do not have a housing stock that aligns with monthly incomes for the people served by CoC-funded projects.

1E-4a.	Reallocation Between FY 2017 and FY 2022.	
	NOFO Section VII.B.2.f.	

	Did your CoC cumulatively reallocate at least 20 percent of its ARD between FY 2017 and FY 2022?	No
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1E-5.	Projects Rejected/Reduced—Notification Outside of e-snaps.	
	NOFO Section VII.B.2.g.	
	You must upload the Notification of Projects Rejected-Reduced attachment to the 4B. Attachments Screen.	

1.	Did your CoC reject or reduce any project application(s)?	No
2.	Did your CoC inform applicants why their projects were rejected or reduced?	No
3.	If you selected Yes for element 1 of this question, enter the date your CoC notified applicants that their project applications were being rejected or reduced, in writing, outside of e-snaps. If you notified applicants on various dates, enter the latest date of any notification. For example, if you notified applicants on 06/26/2022, 06/27/2022, and 06/28/2022, then you must enter 06/28/2022.	

1E-5a.	Projects Accepted–Notification Outside of e-snaps.	
	NOFO Section VII.B.2.g.	
	You must upload the Notification of Projects Accepted attachment to the 4B. Attachments Screen.	

	Enter the date your CoC notified project applicants that their project applications were accepted and ranked on the New and Renewal Priority Listings in writing, outside of e-snaps. If you notified applicants on various dates, enter the latest date of any notification. For example, if you notified applicants on 06/26/2022, 06/27/2022, and 06/28/2022, then you must enter 06/28/2022.	09/13/2022
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1E-5b.	Local Competition Selection Results–Scores for All Projects.	
	NOFO Section VII.B.2.g.	
	You must upload the Final Project Scores for All Projects attachment to the 4B. Attachments Screen.	

	Does your attachment include: 1. Applicant Names; 2. Project Names; 3. Project Scores; 4. Project Rank–if accepted; 5. Award amounts; and 6. Projects accepted or rejected status.	Yes
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1E-5c.	1E-5c. Web Posting of CoC-Approved Consolidated Application.	
	NOFO Section VII.B.2.g.	
	You must upload the Web Posting–CoC-Approved Consolidated Application attachment to the 4B. Attachments Screen.	

	Enter the date your CoC posted the CoC-approved Consolidated Application on the CoC's website or partner's website–which included: 1. the CoC Application; and 2. Priority Listings for Reallocation forms and all New, Renewal, and Replacement Project Listings.	09/26/2022
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1E-5d.	Notification to Community Members and Key Stakeholders that the CoC-Approved Consolidated Application is Posted on Website.	
	NOFO Section VII.B.2.g.	
	You must upload the Notification of CoC-Approved Consolidated Application attachment to the 4B. Attachments Screen.	

	Enter the date your CoC notified community members and key stakeholders that the CoC-approved Consolidated Application has been posted on the CoC's website or partner's website.	09/26/2022
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2A. Homeless Management Information System (HMIS) Implementation

HUD publishes resources on the HUD.gov website at CoC Program Competition to assist you in completing the CoC Application. Resources include:

- Notice of Funding Opportunity (NOFO) for Fiscal Year (FY) 2022 Continuum of Care Competition and Noncompetitive Award of Youth Homeless Demonstration Program Renewal and Replacement Grants;
- 24 CFR part 578;
- FY 2022 CoC Application Navigational Guide;
- Section 3 Resources;
- PHA Crosswalk; and
- Frequently Asked Questions

2A-1.	HMIS Vendor.	
	Not Scored—For Information Only	

	Enter the name of the HMIS Vendor your CoC is currently using.	Wellsky
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2A-2.	HMIS Implementation Coverage Area.	
	Not Scored—For Information Only	

	Select from dropdown menu your CoC's HMIS coverage area.	Single CoC
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2A-3.	HIC Data Submission in HDX.	
	NOFO Section VII.B.3.a.	

	Enter the date your CoC submitted its 2022 HIC data into HDX.	04/28/2022
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2A-4.	Comparable Database for DV Providers—CoC and HMIS Lead Supporting Data Collection and Data Submission by Victim Service Providers.	
	NOFO Section VII.B.3.b.	

	In the field below:	
1.	describe actions your CoC and HMIS Lead have taken to ensure DV housing and service providers in your CoC collect data in databases that meet HUD's comparable database requirements; and	
2.	state whether your CoC is compliant with the 2022 HMIS Data Standards.	

(limit 2,500 characters)

2A-4.1 We confirm that DV providers are using databases that meet HUD's comparable database requirements during the Letter of Interest process for new projects as we will not approve funding if this requirement is not met. We further confirm the use of these databases during the annual monitoring process for all DV providers.

Minnesota's statewide coalition for victim-service providers (VSPs), Violence Free Minnesota, recently led a grant-funded initiative to assist VSPs in assessing their software vendors. The goal was to assess whether their available databases were truly HMIS comparable databases. Violence Free Minnesota staff also liaised with vendors directly. Staff from the HMIS Lead Agency were actively involved in this initiative, providing guidance with respect to HMIS data standards. HMIS staff participated in meetings with VSPs and funders as needed.

The HMIS Lead Agency continues to engage with Violence Free Minnesota, working with a new position funded through a grant from the Office of Justice Programs. This new role aims to identify data collection, technology, and privacy barriers for VSPs and evaluate how these barriers may have prevented VSPs from obtaining sufficient funding. With this partnership between the statewide coalition and HMIS Lead, ICA agreed to provide technical guidance for VSPs via Helpdesk as they work to ensure compliance (while maintaining clear separation of client data; VSP data is not in HMIS nor shared with the HMIS lead directly). This benefits the CoC by continuing to develop partnerships between the HMIS Lead and VSPs.

2A-4.2 Our CoC is compliant with the 2022 HMIS Data Standards.

2A-5.	Bed Coverage Rate—Using HIC, HMIS Data—CoC Merger Bonus Points.	
	NOFO Section VII.B.3.c. and VII.B.7.	

Enter 2022 HIC and HMIS data in the chart below by project type:

Project Type	Total Beds 2022 HIC	Total Beds in HIC Dedicated for DV	Total Beds in HMIS	HMIS Bed Coverage Rate
1. Emergency Shelter (ES) beds	1,483	196	1,044	81.12%
2. Safe Haven (SH) beds	0	0	0	
3. Transitional Housing (TH) beds	589	41	317	57.85%
4. Rapid Re-Housing (RRH) beds	487	0	487	100.00%
5. Permanent Supportive Housing	2,945	55	2,535	87.72%
6. Other Permanent Housing (OPH)	1,020	0	887	86.96%

2A-5a.	Partial Credit for Bed Coverage Rates at or Below 84.99 for Any Project Type in Question 2A-5.	
	NOFO Section VII.B.3.c.	

For each project type with a bed coverage rate that is at or below 84.99 percent in question 2A-5, describe:

1.	steps your CoC will take over the next 12 months to increase the bed coverage rate to at least 85 percent for that project type; and
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2.	how your CoC will implement the steps described to increase bed coverage to at least 85 percent.
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(limit 2,500 characters)

2A.5a.1. - In terms of emergency shelter (ES), the CoC has a large faith-based shelter, Union Gospel Mission (UGM) Bethel Hotel (163 beds), and Ramsey County Family Hotel Program (80 beds) that did not participate in HMIS in 2022. The CoC needs 50 beds to get above 85%. By 2023, UGM will be using HMIS as they will be receiving public sector funds that require it. This will enable the CoC to increase its bed coverage for emergency shelter and transitional housing.

For Transitional Housing (TH), the CoC has four organizations that are not participating in HMIS: Rainbow Health (2 projects/50 beds), Esther Homes (2 beds), Minnesota Assistance Council for Veterans (20 beds), and UGM (3 projects/149 beds) that did not participate HMIS in 2022. UGM accounts for over 27% of non-VSP TH beds in the CoC. The CoC needs 149 beds to get above 85%. Ramsey County (the lead agency) the CoC and the HMIS Lead Agency are currently working with UGM to either convert their own data to HMIS or begin doing regular data uploads to HMIS for their ES and TH projects. For the first time UGM is seeking state and federal funding which will require the use of HMIS so we anticipate that these beds will be incorporated in the coming year. UGM is proceeding with licensure and training.

2A.5a.2. - The CoC was just under 4 percentage points shy of 85% bed coverage for emergency shelter (ES) in the 2022 HIC. The CoC is actively engaged with the HMIS lead and UGM to begin the process for linking them to HMIS. With their upcoming receipt of government funding, participating in HMIS will be a requirement, not just a request. UGM is proceeding with licensure and training. CoC staff will assist with problem solving around data challenges and other barriers. The CoC was nearly 27 percentage points short of 85% bed coverage for transitional housing (TH) in the 2022 HIC. Based on 2022 HIC data, CoC and HMIS Lead Agency staff have identified that the only way to increase the CoC's bed coverage beyond 85% is to set up recurring data uploads from UGM, who our CoC and HMIS Lead Agency are planning with to achieve this goal. The 149 TH beds at UGM would be enough 141 TH to raise our HMIS coverage above 85%.

2A-6.	Longitudinal System Analysis (LSA) Submission in HDX 2.0.	
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NOFO Section VII.B.3.d.	
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Did your CoC submit LSA data to HUD in HDX 2.0 by February 15, 2022, 8 p.m. EST?	
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Yes

2B. Continuum of Care (CoC) Point-in-Time (PIT) Count

HUD publishes resources on the HUD.gov website at CoC Program Competition to assist you in completing the CoC Application. Resources include:

- Notice of Funding Opportunity (NOFO) for Fiscal Year (FY) 2022 Continuum of Care Competition and Noncompetitive Award of Youth Homeless Demonstration Program Renewal and Replacement Grants;
- 24 CFR part 578;
- FY 2022 CoC Application Navigational Guide;
- Section 3 Resources;
- PHA Crosswalk; and
- Frequently Asked Questions

2B-1.	PIT Count Date.	
	NOFO Section VII.B.4.b	

	Enter the date your CoC conducted its 2022 PIT count.	01/26/2022
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2B-2.	PIT Count Data—HDX Submission Date.	
	NOFO Section VII.B.4.b	

	Enter the date your CoC submitted its 2022 PIT count data in HDX.	04/28/2022
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2B-3.	PIT Count—Effectively Counting Youth.	
	NOFO Section VII.B.4.b.	

	Describe in the field below how during the planning process for the 2022 PIT count your CoC:
1.	engaged stakeholders that serve homeless youth;
2.	involved homeless youth in the actual count; and
3.	worked with stakeholders to select locations where homeless youth are most likely to be identified.

(limit 2,500 characters)

2B-3.1: The CoC reached out to youth providers as part of the PIT Count to strongly encourage their street outreach programs to participate and coordinated with Face to Face (youth provider) to use their drop-in center that is centrally located in downtown St. Paul for purposes of the PIT Count. The CoC has identified that more training is needed with youth outreach programs to help them understand the importance of the PIT Count as it relates to accurately counting youth experiencing homeless (including doubled-up youth) and how the count impacts funding for youth services in the region.

2B-3.2: Youth were engaged to help communicate out to their peers regarding the importance of the count and to encourage their peers to participate in the survey.

2B-3.3: Youth providers (including public schools) worked with the CoC PIT Count planning team to determine which geographic areas, public transportation routes (buses and light rail), locations within the region where youth congregate (libraries, malls, coffee shops, recreation centers, etc.) to determine the methodology for conducting the count.

2B-4.	PIT Count–Methodology Change–CoC Merger Bonus Points.	
	NOFO Section VII.B.5.a and VII.B.7.c.	
	In the field below:	
	1. describe any changes your CoC made to your sheltered PIT count implementation, including methodology or data quality changes between 2021 and 2022, if applicable;	
	2. describe any changes your CoC made to your unsheltered PIT count implementation, including methodology or data quality changes between 2021 and 2022, if applicable; and	
	3. describe how the changes affected your CoC's PIT count results; or	
	4. state "Not Applicable" if there were no changes or if you did not conduct an unsheltered PIT count in 2022.	

(limit 2,500 characters)

2B-4.1. The CoC worked with our HMIS Lead Agency to ensure that all tools and reports were updated to reflect the HUD 2022 Data Standards Changes. Aside from data standards changes, data collected for sheltered count was uniform with recent years. The CoC used the HMIS state administrator to upload our non-HMIS projects with their shelter and TH data for calculating counts by demographics and verifying their accuracy.

2B-4.2. The CoC did not make changes to the unsheltered PIT count implementation specifically, but we collaborated with HMIS lead agency to create a new method for aggregate data collection for projects not participating in HMIS and together improved format and ease of use for non-participating agencies.

2B-4.3 By working more closely with our HMIS lead agency, we used a custom data quality report to ensure PIT night data quality. Across the state, the PIT data within HMIS benefitted from the established statewide data quality monitoring process, including follow up efforts by coordinators and funders.

2C. System Performance

HUD publishes resources on the HUD.gov website at CoC Program Competition to assist you in completing the CoC Application. Resources include:

- Notice of Funding Opportunity (NOFO) for Fiscal Year (FY) 2022 Continuum of Care Competition and Noncompetitive Award of Youth Homeless Demonstration Program Renewal and Replacement Grants;
- 24 CFR part 578;
- FY 2022 CoC Application Navigational Guide;
- Section 3 Resources;
- PHA Crosswalk; and
- Frequently Asked Questions

2C-1.	Reduction in the Number of First Time Homeless–Risk Factors Your CoC Uses.	
	NOFO Section VII.B.5.b.	
	In the field below:	
1.	describe how your CoC determined the risk factors to identify persons experiencing homelessness for the first time;	
2.	describe your CoC's strategies to address individuals and families at risk of becoming homeless; and	
3.	provide the name of the organization or position title that is responsible for overseeing your CoC's strategy to reduce the number of individuals and families experiencing homelessness for the first time	

(limit 2,500 characters)

2C-1.1 The CoC uses an evidence-based Homeless Prevention Assessment Tool prepared by Minnesota Housing that weighs risk factors and is used to determine eligibility for various prevention services funded through the state's Family Homeless Prevention and Assistance Program (FHPAP). The risk factors include: whether the household is at imminent risk of literal homelessness (e.g., doubled up, received notice to vacate and has experienced homelessness before, timing of imminent loss of housing and lack of resources), the barriers they are facing (e.g., criminal backgrounds, fleeing DV, prior evictions, income, or trauma impacting housing.)

2C-1.2. With FHPAP households are assessed for either light touch assistance (limited case management services and menial financial assistance, no more than \$100), one-time assistance (one-time funding for rent, deposit or utility payment), short-term assistance (up to six months of assistance), and/or medium-term assistance (up to twenty-four months of assistance). CoC partners also participate weekly in a Housing Court clinic. Households with eviction appearances are able to receive free legal assistance, apply for county Emergency Assistance and work with a mediator from the Dispute Resolution Center to reach a settlement in their case. The CoC provides information to tenants and landlords about basic needs and rental assistance resources. With CARES Act and ARPA funding, emergency rental assistance was offered to renters and landlords and was widely promoted through the CoC and its partners via printed materials, websites, meetings, and directly with individuals and households. In the summer of 2022, the state of Minnesota launched Housing Stability Services that awarded funds to ~6 providers active in Ramsey County to offer eviction prevention services to anyone who is a low-income renter that has experienced a financial hardship and who is at risk of homelessness or housing instability.

2C-1.3. Ramsey County's Housing Stability Department plays a leadership role in homelessness prevention. The CoC established a cross-sector working group in mid 2022 to develop a more detailed prevention and tenant stabilization strategy that includes mainstream organizations, legal services, corrections, and others who will play an important role in helping people maintain housing. This work group is chaired by the HCV Program Director at the Saint Paul Public Housing Authority.

2C-2.	Length of Time Homeless—CoC's Strategy to Reduce.	
	NOFO Section VII.B.5.c.	
	In the field below:	
1.	describe your CoC's strategy to reduce the length of time individuals and persons in families remain homeless;	
2.	describe how your CoC identifies and houses individuals and persons in families with the longest lengths of time homeless; and	
3.	provide the name of the organization or position title that is responsible for overseeing your CoC's strategy to reduce the length of time individuals and families remain homeless.	

(limit 2,500 characters)

1.Elements of the CoC strategy to reduce the time persons are homeless include: ensuring that Coordinated Entry (CE) assessments are offered in multiple places, multiple days and by multiple assessors. Program staff at shelter and day sites offer housing navigation services to assist higher need clients with document recovery and collection, housing search, and connection to benefits. Others provide concurrent stabilization services (e.g., recovery, mental health) along with childcare. At the primary family shelter, navigators connect families to housing, employment search, and assist with goal planning and other support services needed. The CoC regularly monitors how long people are waiting for housing after being assessed through the CE system. Due to these wait times, the CoC is investing more heavily in housing search and navigation.

Another strategy is increasing the use of the Medicaid-funded program Housing Stabilization Services (HSS). Eligible participants must be receiving Medicaid and have documentation of a disabling condition. People can self-refer to HSS services or be referred by a healthcare professional or a social services agency. There are 96 enrolled providers operating in Ramsey County, a large portion who provide Housing Transition Services that begin with creating a person-centered housing plan. Additional services are helping people find and maintain housing (e.g., applying for benefits, working with landlords, negotiating leases, and accessing moving expenses including damage deposits, first-month's rent, and household furnishings.)

2.To identify and house individuals and persons in families with the longest homeless episodes, providers often run regular length of stay HMIS reports to target case management services. The CoC identifies households with the longest homeless periods through CE assessments. Homeless histories are collected and when individuals or households have been assessed and are on the Priority List for housing, they are prioritized first by homeless status (with Chronic and Long-Term homeless the first two categories) and then by Length of Time Homeless. All of the services listed above are used to help house those that have the greatest lengths of homelessness.

3.Ramsey County Housing Stability Department, in partnership with CoC providers, is responsible for overseeing the CoC's strategy to reduce the length of time individuals and families remain homeless.

2C-3.	Exits to Permanent Housing Destinations/Retention of Permanent Housing—CoC's Strategy	
	NOFO Section VII.B.5.d.	
	In the field below:	
	1. describe your CoC's strategy to increase the rate that individuals and persons in families residing in emergency shelter, safe havens, transitional housing, and rapid rehousing exit to permanent housing destinations;	
	2. describe your CoC's strategy to increase the rate that individuals and persons in families residing in permanent housing projects retain their permanent housing or exit to permanent housing destinations; and	
	3. provide the name of the organization or position title that is responsible for overseeing your CoC's strategy to increase the rate that individuals and families exit to or retain permanent housing.	

(limit 2,500 characters)

1.The CoC's strategy to increase the rate that persons exit to permanent housing is multifold: increasing supply (through vouchers and landlord recruitment) and personalized services. In the past year the CoC has increased the supply of permanent housing destinations by successfully applying for additional Emergency Housing and Family Unification Vouchers and adding 408 units of PSH. CoC agencies have increased navigation services to help individuals and families locate housing and deploy the vouchers. Housing outcomes show that more in-depth and person-centered assessments and housing search services lead to an increase in exits to permanent housing. CoC providers are also taking advantage of two programs administered by the State of Minnesota - the Housing Transition Services component of the Medicaid-funded Housing Stabilization Services program described above and Housing Navigation funded through the state's Housing Stability Services program. These valuable programs support navigation that helps households find rental housing opportunities, complete the application process, and conduct landlord outreach and engagement.

2.To assist households in retaining permanent housing, the CoC starts during the Coordinated Entry process, when staff and partners work with households to make housing referrals to projects that provide the level of support needed by the household. The PSH Standardization process used by the CoC improves housing outcomes by setting achievable expectations and ensuring all clients receive services necessary to maintain/attain housing. Once a household is housed, eligible CoC providers can provide Housing Sustaining Services (part of the Medicaid-funding Housing Stabilization Services program) which includes: early identification of behaviors that may jeopardize continued housing, assistance with the housing recertification or annual lease signing process, training on being a good tenant, lease compliance and household management, supporting around the need to maintain income and benefits to retain housing, and working to build supports and resources in the community.

3.The Ramsey County Housing Stability Department, in partnership with CoC providers, is responsible for overseeing the CoC's strategy to increase the rate that individuals and families exit to or retain permanent housing.

2C-4.	Returns to Homelessness—CoC's Strategy to Reduce Rate.	
	NOFO Section VII.B.5.e.	
	In the field below:	
1.	describe your CoC's strategy to identify individuals and families who return to homelessness;	
2.	describe your CoC's strategy to reduce the rate of additional returns to homelessness; and	
3.	provide the name of the organization or position title that is responsible for overseeing your CoC's strategy to reduce the rate individuals and persons in families return to homelessness.	

(limit 2,500 characters)

2C-4.1. The CoC regularly monitors the number of people returning to homelessness six months after leaving programs by using customized HMIS reports to identify clients returning to homelessness. The data is disaggregated by race to ensure that the CoC is aware of any racial group disproportionately returning to homelessness.

2C-4.2. The CoC's strategy to reduce the rate that households return to homelessness emphasizes creating environments for projects to share best practices and receive training, improving referral strategies from coordinated entry, improving landlord engagement, offering stabilization services, and advancing a new intensive program modeled after the evidenced-based Frequent Users System Engagement (FUSE) approach. As described above, agencies in the CoC are providers of Housing Stabilization Services (Medicaid-funded) and the state's Housing Stability Services programs. These interventions assist households who are in danger of returning to homelessness by providing them with tools and resources to maintain their housing. Specific programs help households with issues of hoarding/sanitation, financial coaching, and employment assistance. For individuals that struggle with repeated returns to homelessness and are frequent users of crisis systems, CoC leaders worked with Congresswoman Betty McCollum to advance a \$2M Community Project Funding request for FY23 for "Familiar Faces." The program will target these known individuals and will provide assertive engagement, person-centered services, healthcare and housing planning, and an on-ramp to permanent housing.

2C-4.3. The Ramsey County Housing Stability Department, in partnership with CoC providers, is responsible for overseeing the strategy to decrease the rates of returns to homelessness for individuals and families receiving support services.

2C-5.	Increasing Employment Cash Income—CoC's Strategy.	
	NOFO Section VII.B.5.f.	
	In the field below:	
1.	describe your CoC's strategy to access employment cash sources;	
2.	describe how your CoC works with mainstream employment organizations to help individuals and families experiencing homelessness increase their cash income; and	
3.	provide the organization name or position title that is responsible for overseeing your CoC's strategy to increase income from employment.	

(limit 2,500 characters)

2C-5.1. The CoC's strategy to help individuals and households access cash sources from employment is based on a strong partnership with Ramsey County Workforce Solutions and its mainstream workforce development providers and connections to employers. The director of Workforce Solutions chairs the CoC's workgroup in this area and their strategy is to connect homeless service and housing providers to mainstream workforce development providers and programs, to create more opportunities for those experiencing homelessness to access services in day spaces, libraries and shelter locations, and to explore a new low-barrier day employment program. The CoC dashboard tracks quarterly changes in cash and non-cash income to monitor performance.

2C-5.2 Through this close partnership with Workforce Solutions, the CoC helps to increase cash income for those experiencing homelessness by:

¿ Assisting jobseekers at multiple day spaces and shelters with resume writing, job search and filling out job applications, interview assistance and other related requests

¿ Supporting CoC Program- funded projects that have robust employment services within their organizations. To assist participants in their employment readiness, these organizations help participants obtain documentation, access identification and connect to other organizations, such as Small Sums, that helps homeless and housing insecure individuals, who have found new jobs, with the specific things that they need to start back to work (e.g., bus passes, work boots, uniforms, clothing, etc.). These providers are also connected to disability employment agencies.

¿ Ensuring that the many mainstream resources at Workforce Solutions are known by housing and other service providers. WFS participates in monthly Housing Support/ Long Term Homeless meetings with almost 200 Housing Support providers; WFS held a training in early 2022 for housing providers to introduce them to employment programming and training and learn more about concerns regarding income limitations for certain housing types

2C-5.3. The Ramsey County Housing Stability Department, in partnership with CoC providers, is responsible for overseeing the strategy to increase income from employment.

2C-5a.	Increasing Non-employment Cash Income—CoC's Strategy	
	NOFO Section VII.B.5.f.	
	In the field below:	
	1. describe your CoC's strategy to access non-employment cash income; and	
	2. provide the organization name or position title that is responsible for overseeing your CoC's strategy to increase non-employment cash income.	

(limit 2,500 characters)

2C-5a.1 The CoC's strategy to help people access non-employment cash income relies on meeting people where they are to inform them about benefits and if needed, assist them with applying for and accessing the benefits for which they are eligible. Case managers and financial assistance workers are located in or visit all of the shelters in the CoC's geography to help clients navigate and apply for non-employment cash income including Supplemental Nutritional Assistance Program, General Assistance (state funded) and Medical Assistance. In response to feedback from people with lived experience, the county was awarded state funds to hire an additional financial worker who will move across shelters to determine eligibility and assist with applications. The CoC also provides information to CE assessors, outreach workers, and other frontline staff so that they can also refer individuals to these programs. Two days per week, a SSI/SSDI Outreach, Access, and Recovery (SOAR) navigator, works out of the multi-service day space at Higher Ground Saint Paul. The navigator helps people experiencing homelessness to apply for SSI. Furthermore, on the other days, at the medical clinic co-located there, a social worker helps people to apply and verify documented illnesses and ailments so that they can prove their eligibility. The County brings information about SOAR (and other resources) to Long Term Homeless (LTH) providers at their monthly meetings.

2C-5a.2 The Ramsey County Housing Stability Department, in partnership with CoC providers, is responsible for overseeing the strategy to increase non-employment cash income.

3A. Coordination with Housing and Healthcare

HUD publishes resources on the HUD.gov website at CoC Program Competition to assist you in completing the CoC Application. Resources include:

- Notice of Funding Opportunity (NOFO) for Fiscal Year (FY) 2022 Continuum of Care Competition and Noncompetitive Award of Youth Homeless Demonstration Program Renewal and Replacement Grants;
- 24 CFR part 578;
- FY 2022 CoC Application Navigational Guide;
- Section 3 Resources;
- PHA Crosswalk; and
- Frequently Asked Questions

3A-1.	New PH-PSH/PH-RRH Project–Leveraging Housing Resources.	
	NOFO Section VII.B.6.a.	
	You must upload the Housing Leveraging Commitment attachment to the 4B. Attachments Screen.	

	Is your CoC applying for a new PH-PSH or PH-RRH project that uses housing subsidies or subsidized housing units which are not funded through the CoC or ESG Programs to help individuals and families experiencing homelessness?	No
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3A-2.	New PH-PSH/PH-RRH Project–Leveraging Healthcare Resources.	
	NOFO Section VII.B.6.b.	
	You must upload the Healthcare Formal Agreements attachment to the 4B. Attachments Screen.	

	Is your CoC applying for a new PH-PSH or PH-RRH project that uses healthcare resources to help individuals and families experiencing homelessness?	No
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3A-3.	Leveraging Housing/Healthcare Resources–List of Projects.	
	NOFO Sections VII.B.6.a. and VII.B.6.b.	

If you selected yes to questions 3A-1. or 3A-2., use the list feature icon to enter information about each project application you intend for HUD to evaluate to determine if they meet the criteria.

Project Name	Project Type	Rank Number	Leverage Type
This list contains no items			

3B. New Projects With Rehabilitation/New Construction Costs

HUD publishes resources on the HUD.gov website at CoC Program Competition to assist you in completing the CoC Application. Resources include:

- Notice of Funding Opportunity (NOFO) for Fiscal Year (FY) 2022 Continuum of Care Competition and Noncompetitive Award of Youth Homeless Demonstration Program Renewal and Replacement Grants;
- 24 CFR part 578;
- FY 2022 CoC Application Navigational Guide;
- Section 3 Resources;
- PHA Crosswalk; and
- Frequently Asked Questions

3B-1.	Rehabilitation/New Construction Costs–New Projects.	
	NOFO Section VII.B.1.s.	

Is your CoC requesting funding for any new project application requesting \$200,000 or more in funding for housing rehabilitation or new construction?	No
--	----

3B-2.	Rehabilitation/New Construction Costs–New Projects.	
	NOFO Section VII.B.1.s.	

If you answered yes to question 3B-1, describe in the field below actions CoC Program-funded project applicants will take to comply with:

1.	Section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u); and
2.	HUD's implementing rules at 24 CFR part 75 to provide employment and training opportunities for low- and very-low-income persons, as well as contracting and other economic opportunities for businesses that provide economic opportunities to low- and very-low-income persons.

(limit 2,500 characters)

N/A

3C. Serving Persons Experiencing Homelessness as Defined by Other Federal Statutes

HUD publishes resources on the HUD.gov website at CoC Program Competition to assist you in completing the CoC Application. Resources include:

- Notice of Funding Opportunity (NOFO) for Fiscal Year (FY) 2022 Continuum of Care Competition and Noncompetitive Award of Youth Homeless Demonstration Program Renewal and Replacement Grants;
- 24 CFR part 578;
- FY 2022 CoC Application Navigational Guide;
- Section 3 Resources;
- PHA Crosswalk; and
- Frequently Asked Questions

3C-1.	Designating SSO/TH/Joint TH and PH-RRH Component Projects to Serving Persons Experiencing Homelessness as Defined by Other Federal Statutes.	
	NOFO Section VII.C.	

	Is your CoC requesting to designate one or more of its SSO, TH, or Joint TH and PH-RRH component projects to serve families with children or youth experiencing homelessness as defined by other Federal statutes?	No
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3C-2.	Serving Persons Experiencing Homelessness as Defined by Other Federal Statutes.	
	NOFO Section VII.C.	

You must upload the Project List for Other Federal Statutes attachment to the 4B. Attachments Screen.

If you answered yes to question 3C-1, describe in the field below:

1.	how serving this population is of equal or greater priority, which means that it is equally or more cost effective in meeting the overall goals and objectives of the plan submitted under Section 427(b)(1)(B) of the Act, especially with respect to children and unaccompanied youth than serving the homeless as defined in paragraphs (1), (2), and (4) of the definition of homeless in 24 CFR 578.3; and
2.	how your CoC will meet requirements described in Section 427(b)(1)(F) of the Act.

(limit 2,500 characters)

N/A

4A. DV Bonus Project Applicants

HUD publishes resources on the HUD.gov website at CoC Program Competition to assist you in completing the CoC Application. Resources include:

- Notice of Funding Opportunity (NOFO) for Fiscal Year (FY) 2022 Continuum of Care Competition and Noncompetitive Award of Youth Homeless Demonstration Program Renewal and Replacement Grants;
- 24 CFR part 578;
- FY 2022 CoC Application Navigational Guide;
- Section 3 Resources;
- PHA Crosswalk; and
- Frequently Asked Questions

4A-1.	New DV Bonus Project Applications.	
	NOFO Section II.B.11.e.	

	Did your CoC submit one or more new project applications for DV Bonus Funding?	No
Applicant Name		
This list contains no items		

4B. Attachments Screen For All Application Questions

We have provided the following guidance to help you successfully upload attachments and get maximum points:

1.	You must include a Document Description for each attachment you upload; if you do not, the Submission Summary screen will display a red X indicating the submission is incomplete.
2.	You must upload an attachment for each document listed where 'Required?' is 'Yes'.
3.	We prefer that you use PDF files, though other file types are supported—please only use zip files if necessary. Converting electronic files to PDF, rather than printing documents and scanning them, often produces higher quality images. Many systems allow you to create PDF files as a Print option. If you are unfamiliar with this process, you should consult your IT Support or search for information on Google or YouTube.
4.	Attachments must match the questions they are associated with.
5.	Only upload documents responsive to the questions posed—including other material slows down the review process, which ultimately slows down the funding process.
6.	If you cannot read the attachment, it is likely we cannot read it either. We must be able to read the date and time on attachments requiring system-generated dates and times, (e.g., a screenshot displaying the time and date of the public posting using your desktop calendar; screenshot of a webpage that indicates date and time). We must be able to read everything you want us to consider in any attachment.
7.	After you upload each attachment, use the Download feature to access and check the attachment to ensure it matches the required Document Type and to ensure it contains all pages you intend to include.

Document Type	Required?	Document Description	Date Attached
1C-7. PHA Homeless Preference	No	1C-7 Homeless Pre...	09/22/2022
1C-7. PHA Moving On Preference	No	1C-7 Moving On Pr...	09/22/2022
1E-1. Local Competition Deadline	Yes	1E-1. Local Compe...	09/23/2022
1E-2. Local Competition Scoring Tool	Yes	1E-2 Local Compet...	09/22/2022
1E-2a. Scored Renewal Project Application	Yes	1E-2a. Scored Ren...	09/23/2022
1E-5. Notification of Projects Rejected-Reduced	Yes	1E-5. Notificatio...	09/22/2022
1E-5a. Notification of Projects Accepted	Yes	1E-5a. Notificati...	09/22/2022
1E-5b. Final Project Scores for All Projects	Yes	1E-5b. Final Proj...	09/22/2022
1E-5c. Web Posting—CoC-Approved Consolidated Application	Yes		
1E-5d. Notification of CoC-Approved Consolidated Application	Yes		
3A-1a. Housing Leveraging Commitments	No	3A-1a. Housing L...	09/23/2022

3A-2a. Healthcare Formal Agreements	No	3A-2a. Healthcare...	09/23/2022
3C-2. Project List for Other Federal Statutes	No		

Attachment Details

Document Description: 1C-7 Homeless Preference

Attachment Details

Document Description: 1C-7 Moving On Preference

Attachment Details

Document Description: 1E-1. Local Competition Deadline

Attachment Details

Document Description: 1E-2 Local Competition Scoring Tool

Attachment Details

Document Description: 1E-2a. Scored Renewal Project Application

Attachment Details

Document Description: 1E-5. Notification of Projects Rejected-Reduced

Attachment Details

Document Description: 1E-5a. Notification of Projects Accepted

Attachment Details

Document Description: 1E-5b. Final Project Scores for All Projects

Attachment Details

Document Description:

Attachment Details

Document Description:

Attachment Details

Document Description: 3A-1a. Housing Leveraging

Attachment Details

Document Description: 3A-2a. Healthcare Formal Agreements

Attachment Details

Document Description:

Submission Summary

Ensure that the Project Priority List is complete prior to submitting.

Page	Last Updated
1A. CoC Identification	09/22/2022
1B. Inclusive Structure	09/22/2022
1C. Coordination and Engagement	09/22/2022
1D. Coordination and Engagement Cont'd	09/23/2022
1E. Project Review/Ranking	09/26/2022
2A. HMIS Implementation	09/22/2022
2B. Point-in-Time (PIT) Count	09/22/2022
2C. System Performance	09/22/2022
3A. Coordination with Housing and Healthcare	09/23/2022
3B. Rehabilitation/New Construction Costs	09/23/2022
3C. Serving Homeless Under Other Federal Statutes	09/23/2022

FY2022 CoC Application	Page 66	09/26/2022
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4A. DV Bonus Project Applicants	09/23/2022
4B. Attachments Screen	Please Complete
Submission Summary	No Input Required

Written Policies on Homeless Admission Preferences with PHAs.

Metropolitan Council HRA policy:

- “Move Up” from Permanent Supportive Housing (2 points)

The PHA will partner with the Hennepin, Ramsey and Suburban Metro Area Continuum of Care (CoC) to identify individuals and families ready to transition or “move up” from Permanent Supportive Housing (PSH) units. These are families that were homeless prior to entry into the PSH program and who continue to need a rental subsidy but no longer require intensive supportive services.

- The PHA will accept referrals from the CoC’s Coordinated Entry Program. Move-Up applicants will be identified by PSH based on Move-Up eligibility criteria:
 - A minimum of two years living in Permanent Supportive Housing
 - Ongoing source of income
 - Paid rent on-time and in full every month for at least ten of the past twelve months or are in compliance with the Housing Supports program.
 - Connected to mainstream or community resources
- The PHA will allocate up to 40 Housing Choice Vouchers per calendar year toward the Move-Up Preference. Once these vouchers have been utilized in a calendar year, no additional priority will be given under this category.

PUBLIC HOUSING AGENCY OF THE CITY OF SAINT PAUL

SECTION 8 HOUSING CHOICE VOUCHER ADMISSION AND OCCUPANCY POLICIES

**Approved by the PHA Board of Commissioners on
February 23, 2000**

Amended:

August 2002	April 2007	July 2011	January 2015	October 2018
January 2003	April 2008	August 2011	May 2015	November 2018
August 2003	August 2008	January 2012	October 2015	April 2019
December 2003	December 2008	February 2013	January 2016	October 2019
February 2004	March 2009	February 2014	November 2016	May 2020
July 2004	October 2009	April 2014	April 2017	June 2020
October 2005	December 2009	May 2014	September 2017	September 2020
December 2005	June 2010	September 2014	October 2017	November 2020
January 2006	July 2010	October 2014	January 2018	December 2020

NOTICE TO ALL HOLDERS OF THE SECTION 8 HOUSING CHOICE VOUCHER ADMISSION AND OCCUPANCY POLICIES:

The Policies contained herein are subject to change, without prior notice to Policyholders, by action of The Department Of Housing and Urban Development and/or the Commissioners Of The Public Housing Agency Of The City Of Saint Paul. The regulations of the Department of Housing and Urban Development for the Section 8 Housing Choice Voucher Admission and Occupancy Policies are incorporated by reference as if fully set forth herein.

Section 8 Admission & Occupancy Policies

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**PART ONE:
ELIGIBILITY FOR PARTICIPATION**

I. Overview:

Only families and individuals who meet program eligibility requirements may receive Section 8 rental assistance. The following six factors determine whether an applicant is eligible:

Refer to:

24 CFR
§982.201(a),(c)

A. Family Status Requirement: A family is a person or group of persons, as determined by the PHA consistent with 24 CFR 5.403, approved to reside in a unit with assistance under the program. A “Family” includes but is not limited to the following, regardless of actual or perceived sexual orientation, gender identity, or marital status:

§5.403

1. A single person, who may be an elderly person, displaced person, disabled person, near-elderly person, or any other single person; or
2. A group of persons residing together, and such group includes but is not limited to:
 - a. A family with or without children (A child who is temporarily away from the home because of placement in foster care is considered a member of the family.);
 - b. An elderly family;
 - c. A near-elderly family;
 - d. A disabled family;
 - e. A displaced family; and
 - f. The remaining member of a tenant family.

B. Owner-Occupant Restrictions: The PHA cannot assist applicants who own or have a financial interest in the dwelling unit they intend to rent. If the unit is owned as a cooperative, an applicant who is a member of the cooperative may receive Section 8 rental assistance, provided they meet all other eligibility requirements.

§882.401(5)
§982.306(d)-(f)

C. Adult Head of Household: The head of household must be age eighteen or older.

§982.308(a)

SECTION 8 ADMISSION & OCCUPANCY POLICIES

D. Social Security Number Requirement: The applicant must provide the Social Security number (SSN) and valid Social Security card for all family members unless one of the exceptions stated in HUD regulations applies.

§5.216;
PIH 2010-3

§982.551(b)(3)

Citizens and lawfully present noncitizens who state that they have not been assigned a SSN by the SSA should make such declaration in writing and under penalties of perjury. The documentation must be disclosed in the tenant file.

E. Penalties for Failure to Disclose Social Security Number and/or Provide Required Documentation.

1. Unless one of the exceptions stated in HUD regulations applies, the PHA must deny the eligibility of an applicant if he or she (including each member of the household who is required to disclose his/her SSN) does not disclose a SSN and/or provide the required documentation for the SSN.
2. However, if the family is otherwise eligible for admission to public housing, the family may maintain its position on the waiting list for not more than 60 days after it is found to meet all other eligibility requirements.

F. United States Citizenship Status Requirements:

§982.551(b)

1. An applicant who is a citizen must sign a declaration of U.S. citizenship.
2. Applicants who are age 62 or older who are non-citizens must sign a declaration of eligible immigration status and provide a proof of age document.
3. Other non-citizen applicants must sign a declaration of eligible immigration status, a signed verification consent form, and U.S. Immigration and Naturalization Service forms to establish their eligibility for Section 8 rental assistance.

§5.508(b)(2)

§5.508(c)

G. Income Limits Requirement: The applicant family or individual must meet income requirements and the PHA must attempt to target 75% of new admissions to the Extremely Low Income category.

§982.201
§982.201(b)(2)
(i)

1. The family is eligible if their annual income is at, or below, the income limit set for Very Low Income Families. This income limit is based upon 50% of the median income for the area.
2. The family is eligible if their annual income is between 51-80% of the median income for the area, and any of the following categories apply:

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- a. Families “continuously assisted” in Public/Indian, Section 23 or Section 8 housing;
 - b. Families physically displaced by rental rehabilitation;
 - c. Non-purchasing tenants of certain homeownership programs;
 - d. Tenants displaced from certain Section 221 and 236 projects;
 - e. Low income families residing in certain HUD-owned projects (these families are eligible for a Certificate only)
3. The Department of Housing and Urban Development (HUD) may authorize Section 8 assistance for specific uses. Under these circumstances, assistance could be provided to families with low incomes, meaning anticipated annual income between 51-80% of the median income for the area. §982.203(a)(b)
4. The PHA examines the current family income and projects it forward for the next twelve months to calculate anticipated annual income. A period of less than twelve months may be used if the family’s source of income is temporary or unusual and will not likely recur in the next twelve months. No deductions or allowances are subtracted from the total annual income in determining the family’s eligibility for the program. §982.201
§5.653(e)
5. The income limit restrictions do not apply to a family already being assisted by the Section 8 Program. The family will not be required to leave the program if their income exceeds the current income limit.
6. In determining the income eligibility of a student at an institution of higher learning who is under age 24, the income eligibility of the parent(s) of the student may also have to be determined. See the section below and **Appendix N, Students’ Eligibility for Vouchers.** §5.612(g)

Income Limits for Section 8 Vouchers in 2021		
Area Median Income \$100,000		
	Priority for Section 8 Vouchers	Maximum Income for Section 8 Vouchers
Household Size	Extremely Low Income (30% of AMI)	Very Low Income (50% of AMI)
1 Person	\$22,050	\$36,750
2 Person	\$25,200	\$42,000
3 Person	\$28,350	\$47,250
4 Person	\$31,450	\$52,450
5 Person	\$34,000	\$56,650
6 Person	\$36,500	\$60,850
7 Person	\$40,120	\$65,050
8 Person	\$44,660	\$69,250
Effective 4/1/2021		

H. Eligibility of Adult Students for Section 8 Vouchers.

An adult student under age 24, enrolled at an institution of higher learning, may be ineligible for Section 8 Housing Choice Vouchers or Project-Based Voucher (PBV) assistance, based on the financial situation of the student's parents.

In general, a student under age 24 can be eligible for Section 8 assistance if the student is:

1. Financially independent from his or her parents; or
2. A veteran of the U.S. military; or
3. Married, or
4. A person with disabilities who was receiving Section 8 assistance as of November 30, 2005; or
5. Has dependent children.

If the student does not meet one or more of those exceptions, the student will only be eligible for Section 8 if the student's parents' income is within the Section 8 income limits. The student's own income must also be within the Section 8 income limits.

The restrictions do not apply to students living with their parents in a Section 8-assisted unit or students who live with parents who are themselves applying to receive Section 8 assistance.

See **Appendix N, Students' Eligibility for Vouchers.**

II. Denial or Termination of Assistance

A. Denial of assistance for an applicant may include any or all of the following: §982.552(a)(2)

1. Denying listing on the PHA waiting list,
2. Denying or withdrawing a certificate or voucher,
3. Refusing to enter into a HAP contract or approve a lease,
4. Refusing to process or provide assistance under portability procedures.

In deciding to deny or terminate assistance based on a violation of law, rules, or other requirements, the PHA has the discretion to consider all of the circumstances in each case, including but not limited to the following: §982.552(c)(2)

- The seriousness of the offense;
- The length of time since the offense;
- The number of offenses, and;
- The extent of participation or culpability of each family member.

In addition, the PHA may consider any mitigating circumstances related to a disability of a family member and the effects of denial or termination of assistance on other family members who were not involved in the action.

The Violence Against Women and Justice Department Reauthorization Act of 2005 (“VAWA”) protects qualified applicants or tenants and family members of applicants or tenants who are victims of domestic violence, dating violence, or stalking from being evicted or terminated from housing assistance based solely on acts of such violence against them. (See **Appendix M VAWA Policy**) §982.552(c)(2)
(v)
§5.2001

B. Requirement to Deny or Terminate Assistance:

1. The PHA must terminate assistance for a family evicted from housing assisted under Section 8 for a serious violation of the lease. §982.552(b)(2)
 - a. Victim of Domestic Violence. A property owner participating in the Section 8 program must not evict a family for serious or repeated lease violations or criminal activity related to domestic violence, dating violence or stalking, solely because a family member is a victim of domestic violence, dating violence or stalking. The property

SECTION 8 ADMISSION & OCCUPANCY POLICIES

owner or the PHA may require that a household member who is the perpetrator of such criminal acts be removed from the lease. (See Appendix M, VAWA Policy)	§884.216(c)
b. The PHA may deny or terminate assistance, and the property owner may terminate the lease and evict the family, including the family member who is or claims to be a victim of such domestic violence if	
i. The tenant fails or refuses to provide a signed certification or other documentation within 14 business days after being asked to do so; or	
ii. There is an actual and imminent threat to other tenants, staff (of the property owner or the PHA) or persons providing service to the property if the tenant is not evicted or terminated from assistance.	§5.2005
2. The PHA must deny admission or terminate assistance for a participant if any member of the family fails to sign and submit consent forms needed to obtain information required for administration of the program.	§5.2007
3. The PHA must deny admission or terminate assistance for a participant if any family member fails to submit required evidence of citizenship or eligible immigration status.	§5.2005(e)
4. The PHA must deny admission or terminate assistance for a participant who is required to register for life under any states' sex offender registration program.	§982.553
5. The PHA must deny admission or terminate assistance for any household that includes a member who has been convicted of drug-related criminal activity for the manufacture or production of methamphetamine on the premises of any federally assisted housing.	§5.612
6. The PHA must deny or terminate assistance if any family member fails to meet the eligibility requirements concerning individuals enrolled at an institution of higher education as specified in 24 CFR 5.612. See Appendix N, Students' Eligibility for Vouchers .	§982.551
C. Grounds for Denial or Termination of Assistance:	§982.552(c)
1. If the family violates any family obligations under the program, including the requirement that the family supplies any information that the PHA or HUD determines is necessary in the	

SECTION 8 ADMISSION & OCCUPANCY POLICIES

administration of the program. “Information” includes any requested certification, release or other documentation.

2. If any member of the family has been evicted from federally assisted housing in the past five (5) years;
3. If a Public Housing Authority (PHA) has ever terminated assistance under the certificate or voucher program for any member of the family within the past five (5) years ;
4. If any member of the family commits drug-related criminal activity; violent criminal activity; alcohol abuse that may threaten the health, safety or right to the peaceful enjoyment of the premises by other residents; or other criminal activity which may threaten the health, safety or right to the peaceful enjoyment of the premises by other residents, other persons residing in the immediate vicinity, property owners and management, or PHA staff and contractors. §982.553; §982.553(a)(2)(ii)
5. If any member of the family commits fraud, bribery or any other corrupt or criminal act in connection with any federal housing program;
6. If the family currently owes rent or other amounts to the PHA or to another HA in connection with Section 8 or public housing assistance under the 1937 Act;
7. If the family has not reimbursed any HA for amounts paid to an owner under a HAP contract for rent, damages to the unit, or other amounts owed by the family under the lease;
8. If the family breaches an agreement with the PHA to pay amounts owed to a Housing Authority;
9. If the family has engaged in, or threatened, abusive or violent behavior toward PHA personnel;
10. If any member of the family fails to sign and submit consent forms for obtaining information.
11. If a Welfare to Work (WTW) family fails to fulfill its obligations under the WTW voucher program.
12. Victim of Domestic Violence. The PHA will not deny or terminate assistance solely because a family member is or has been a victim of domestic violence, dating violence or stalking. See above, Section B.1.b., and **Appendix M**.

SECTION 8 ADMISSION & OCCUPANCY POLICIES

13. Perpetrator of Domestic Violence. The PHA may deny or terminate the assistance of any member of an assisted household who engages in criminal activity directly related to actual or threatened domestic violence, dating violence, or stalking, without affecting the assistance of the remaining household members.

D. Ineligibility If Evicted For Drug-Related Activity: Persons evicted from public housing, Indian housing, Section 23, or any Section 8 Program because of a drug-related criminal activity are ineligible for admission to Section 8 Programs for a three-year period beginning on the date of such eviction.

E. Denial or Termination for Illegal Use of Controlled Substance §982.553

and Alcohol Abuse: The PHA may deny assistance for any person if the PHA determines that the person is illegally using a controlled substance or such use has occurred within three years before the date of denial. The PHA may terminate assistance of any person if the PHA determines that the person is illegally using a controlled substance or has illegally used a controlled substance within a reasonable time before the date of termination. The PHA may also deny or terminate assistance if there is reasonable cause to believe the person abuses alcohol in a way that may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents; or that there is reasonable cause to believe that the person's pattern of illegal use of a controlled substance or pattern of abuse of alcohol may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents.

1. The PHA may waive the policies prohibiting admission in these circumstances if the person demonstrates to the PHA's satisfaction that the person is no longer engaging in the illegal use of a controlled substance or abuse of alcohol and has successfully completed a supervised drug or alcohol rehabilitation program; has otherwise been rehabilitated successfully; or is participating in a supervised drug or alcohol rehabilitation program.

§982.316

F. The PHA may at any time refuse to approve or withdraw approval of a person as a live-in aide if the proposed live-in aide has:

- Committed fraud, bribery or any other corrupt or criminal act in connection with any federal housing program.
- Commits drug-related or violent criminal activity; or

SECTION 8 ADMISSION & OCCUPANCY POLICIES

- Currently owes rent or other amounts to the PHA or to another housing authority in connection with Section 8 or public housing.

III. The Waiting List

- Households must complete a pre-application to be considered for the waiting list. §982.202
§982.204(a)
§982.205(a)
- Households must complete an application to participate in the Section 8 Program.
- Applicants must supply any information the PHA or HUD determines is necessary in the administration of the program. Information includes any requested certification, release or other documentation. §982.203
- Eligible applicants are put on a waiting list for admission that uses a randomized date and time of application, and preference factors to determine priority of placement.
- With HUD's approval, the PHA may admit a family that is not on the PHA waiting list or without considering that family's position on the waiting list as a special admission. §982.204
- If a family is currently on the St. Paul Section 8 waiting list and ports into St. Paul using another Housing Authority's voucher, that participant family's name will be removed from the St. Paul Section 8 waiting list.

A. When Applications Are Taken:

1. Applications for assistance are taken at all times unless, in the judgment of the PHA, it should close the waiting list because it has a sufficient number of applicants it can serve in a reasonable period of time. §982.206
2. When the waiting list is closed the PHA will accept an application under the following circumstances: §982.206
 - a. HUD provides a special allocation of Section 8 assistance for a specific use or program and there are not sufficient applicants on the waiting list who meet the program criteria for the specific use or program.

SECTION 8 ADMISSION & OCCUPANCY POLICIES

- B. Updating the Waiting List:** No less than annually, the PHA will update the waiting list and remove the names of those applicants who are no longer interested in participating in the Section 8 Program or who no longer qualify, or who cannot be reached. §982.204(c)
- C. Reinstatement to the Waiting List:** When applicants are removed from the waiting list when the list is updated, and they later contact the PHA regarding their continued interest in Section 8, they will be reinstated to the list if they contact the PHA in writing (including using the PHA's online applicant portal) within 60 days from the date of their removal from the list. Their place on the waiting list will be based on their original date and time of application, but their preference status will be based on current circumstances (resident or non-resident, etc). §982.204(c)
- D. Closing and Opening the Waiting List:** Before suspending or resuming taking applications for Housing Choice Vouchers, the PHA will issue a public announcement. The announcement will be published in local newspapers at least two weeks before the waiting list is opened or closed. §982.206(a)(2)

IV. Calculating Annual Income

- A. Annual Income:** Annual income is the anticipated total income from all sources listed in this section received by or on behalf of the head of household and spouse (*even if temporarily absent*); and any other family member unless specifically excluded by federal regulation. §5.609(a)
1. Annual income will be anticipated for the twelve-month period following the effective date of initial determination of eligibility or the effective date of the re-examination of income. If it is not feasible to anticipate a level of income for a twelve-month period, the income anticipated for a shorter period may be **annualized**, subject to a re-determination at the end of the shorter period.
 2. Annual income includes, but is not limited to the following:
 - a. The full amount, before any payroll deductions, of **wages and salaries**, including compensation for overtime and other compensation for personal services. §5.609(b)(1)
 - b. Net income from operation of a **business or profession**. §5.609(b)(2)

SECTION 8 ADMISSION & OCCUPANCY POLICIES

- (1) Expenditures for business expansion or amortization of capital indebtedness will not be used as deductions in determining net income.
 - (2) An allowance for depreciation of assets used in a business or profession may be deducted, based on straight-line depreciation, as provided in Internal Revenue Service regulations.
 - (3) Any withdrawal of cash or assets from the operation of a business or profession shall be included in income, except to the extent the withdrawal is reimbursement of cash or assets invested in the operation by the family.
- c. Interest, dividends, and other **net income of any kind** from assets whether real or personal property or instruments such as stocks, bonds, certificates of deposit. §5.609(b)(3)
- (1) Expenditures for amortization of capital indebtedness shall not be used as a deduction in determining net income.
 - (2) An allowance for depreciation of real or personal property may be deducted from the interest, dividends or other net income derived from the property (*straight line depreciation shall be used as provided in Internal Revenue Service regulations*).
 - (3) Any withdrawal of cash or assets from an investment shall be included in income except to the extent the withdrawal is reimbursement of cash or assets invested by the family.
- §5.609(b)(3)
- (4) Where the family has net family assets in excess of \$5,000, annual income shall include the greater of the actual income derived from all net family assets or a percentage of the value of such assets based on the current passbook savings rate as determined by the PHA in accordance with HUD guidelines.
 - (5) Actual income from assets if total assets are \$5,000 or less.
- d. The full amount of periodic payments before deductions, received from **Social Security, annuities, periodic payments from insurance policies, retirement income, pensions, disability or death benefits**, and other similar types of periodic receipts. §5.609(b)(4)

SECTION 8 ADMISSION & OCCUPANCY POLICIES

- e. Payments in lieu of earnings, such as **unemployment and disability compensation, Worker's Compensation and severance pay**. *(Note the exclusion of lump sums to income listed in the following Section B. 4.)* §5.609(b)(5)
- f. **Welfare assistance payments:** §5.609(b)(6)
 - 1. If the household's welfare payment (MFIP or other) is reduced because of an act of fraud by a family member or because of any family member's failure to comply with requirements to participate in an economic self-sufficiency program or work activity, the amount of rent required to be paid by the family will not be decreased. In such cases, the amount of income attributable to the family will include what the family would have received had they complied with the welfare requirements and/or had not committed an act of fraud.
 - 2. If the amount of welfare assistance is reduced as a result of a lifetime time limit, the reduced amount is the amount that shall be counted as income.
- g. Periodic and determinable allowances, such as **alimony, child support payments, and regular contributions or gifts**, including amounts received from any person not residing in the dwelling. §5.609(b)(7)
- h. **All regular pay, special payments and allowances** (*such as longevity, overseas duty, rental allowances, allowances for dependents, etc.*), received by a **member of the Armed Forces** (*whether or not living in the dwelling*) who is head of the family, spouse, or other family member whose dependents are residing in the unit. §5.609(b)(8)
- i. Payments to the head of the household for **support of a minor**, or payments nominally to a minor for his support, but controlled for his benefit by the head of the household or a resident family member other than the head, who is responsible for his support. §5.609(b)(7)
- j. **Relocation payments** made to displaced households made under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 or under 104(d) of the Housing and Community Development Act. The amount of income to be included will be based upon the number of months remaining in their 42 or 60 months entitlement since 49 CFR 24.208 (Department of Transportation Regulations), HUD Handbook 1378, §2-8

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the date the family received its first replacement housing payment.

- k. **Student Financial Assistance.** Scholarships and grants (not loans) are included in Annual Income to the extent that the scholarships and grants exceed actual tuition costs, for a student under the age of 24 who is enrolled at an institution of higher learning and who is applying for or receiving Section 8 rent assistance on his or her own, and not as part of his or her parents' household. Such scholarship assistance is not counted as annual income if the student is younger than 18, or is 24 or older, or is financially independent from his or her parents, or is a veteran of the U.S. military, or is married, or has dependent children. See also VI.B.5. below and **Appendix N Students' Eligibility for Vouchers.** §5.609(b)(9)

B. Annual Income Does Not Include:

1. **Non-recurring income**, defined as: 24 CFR 5
 - a. Temporary, non-recurring or sporadic income (including gifts). §5.609(c)(9)
 - b. Amounts which are specifically received for, or are a reimbursement of, the cost of medical expenses for any family member. §5.609(c)(4)
2. **Income from employment of minors (*including foster children*).** §5.609(c)(1)
3. **Income of certain care providers:**
 - a. **Foster Care:** Payments received for the care of foster children or foster adults. §5.609(c)(2)
 - b. **Care Attendant or Live-In Aide Income:** Income of a Care Attendant will not be counted in determining the family's income if the PHA determines that the care attendant is essential to the care and well being of a family member. §5.609(c)(5)
 - c. **Care of a Disabled Family Member:** Amounts paid by a state agency to a family with a developmentally disabled family member living at home to offset the cost of services and equipment needed to keep the developmentally disabled family member at home. §5.609(c)(16)

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4. **Lump-sum Additions:** Lump-sum additions to family assets; such as, but not necessarily limited to:
 - a. Inheritances;
 - b. Insurance payments, including payments under health and accident insurance and worker's compensation;
 - c. Capital gains;
 - d. Settlements for personal or property losses;
 - e. Deferred periodic payments of Supplemental Security Income (SSI) and Social Security benefits that are received in a lump sum payment.

§5.609(c)(3)

§5.609(c)(14)
5. **Scholarships**

§5.609(c)(6)

 - a. **Student Financial Assistance;** The full amounts of student financial assistance, whether paid directly to the student or to the educational institution, are excluded from annual income if the student is younger than 18, or is 24 or older, or is financially independent from his or her parents, or is a veteran of the U.S. military, or is married, or has dependent children. See **Appendix N Students' Eligibility for Vouchers**
 - b. Scholarships that are included in annual income for determining eligibility: See VI.A.2.k. above.
6. **Hostile fire pay:** The special-duty pay to a family member serving in the Armed Forces who is exposed to hostile fire.

§5.609(c)(7)
7. Income from **certain training programs:**
 - a. Amounts received under training programs funded by HUD as determined by the program's guidelines.

§5.609(c)(8)(i)
 - b. Amounts received by a disabled person that are disregarded for a limited time for purposes of Supplemental Security Income (SSI) eligibility and benefits because they are set aside for use under a Plan to Attain Self-Sufficiency (PASS).

§5.609(c)(8)(ii)
 - c. Amounts received by a participant in other publicly assisted programs which are specifically for or in reimbursement of out-of-pocket expenses incurred (*special equipment, clothing, transportation, child care, etc.*). The payments must be made solely to allow participation in a specific program.

§5.609(c)(8)(iii)

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- d. A resident service stipend, not to exceed \$200 per month, received by a resident for performing a service for the owner, on a part-time basis, that enhances the quality of life in the development. Payment in excess of \$200 a month will cause the entire amount to be considered income. No resident may receive more than one such stipend during the same period of time. §5.609(c)(8)(iv)
 - e. Compensation from state or local employment training programs and training of a family member as resident management staff; this income is excluded only for a limited period as provided for in the program's guidelines. §5.609(c)(8)(v)
 - f. Earnings and benefits to any family member resulting from the participation in a program providing employment training and supportive services in accordance with the Family Support Act of 1988, Section 22 of the 1937 Act (42 U.S.C. 1437 t) or any comparable federal, state, or local law during exclusion period.
8. **Certain earnings disregarded:** Effective May 1, 2001, **for persons with disabilities**, the incremental earnings due to employment during a cumulative 12-month period following date of the initial hire shall be excluded. This exclusion is only available to the following families: §5.617
- a. Families whose income increases as a result of employment of a family member with a disability who was previously unemployed (defined as having earned, in the twelve months previous to employment, no more than would be received for 10 hours of work per week for 50 weeks at the established minimum wage) for one or more years prior to employment.
 - b. Families whose income increases as the result of new employment or increased earnings by a family member with a disability during participation in any economic self-sufficiency or other job training program.
 - c. Families whose income increases as the result of new employment or increased earnings by a family member with a disability during or within 6 months after receiving assistance, benefits or services under a State TANF or Welfare-to-Work Program, provided that the total amount of such assistance, benefits and services over a six-month period is at least \$500.

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During the second cumulative 12-month period after the date of initial hire, 50% of the increased income shall be excluded from income.

The disallowance of increased income of an individual family member is limited to a lifetime 24-month period. It only applies for 12 months of the 100% exclusion and 12 months of the 50% exclusion.

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| 9. Reparation payments: Reparation payments paid by a foreign government pursuant to claims filed under the laws of the government by persons who were persecuted during the Nazi era. | §5.609(c)(10) |
| 10. Earnings in excess of \$480 per year for each full-time student 18 years old or older (<i>excluding the head of household or spouse</i>). | §5.609(c)(11) |
| 11. Adoption assistance payments in excess of \$480 per adopted child. | §5.609(c)(12) |
| 12. Refunds or rebates received by the family under state or local law for property taxes paid on the dwelling unit. | §5.609(c)(15) |
| 13. Statutory Exclusions: Amounts specifically excluded by any other federal statute from consideration as income for purposes of determining eligibility or benefits under a category of assistance programs that includes assistance under the National Housing Act of 1937 or Section 236 of the National Housing and Community Development Act of 1974. | §5.609(c)(17) |

The following are statutorily excluded from annual income:

- a. The value of the allotment provided to an eligible household under the Food Stamp Act of 1977 (7 U.S.C. 2017(b));
- b. Payments to volunteers under the domestic Volunteer Services Act of 1973 (42 U.S.C. 5044(g), 5058);
- c. Payments received under the Alaska Native Claims Settlement Act (43 U.S.C. 1626(c));
- d. Income derived from certain submarginal land of the United States that is held in trust for certain Indian Tribes (25 U.S.C. 459e);
- e. Payments or allowances made under the Department of Health and Human Services Low-Income Home Energy Assistance Program (42 U.S.C. 8624(f));

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- f. Income derived from the disposition of funds of the Grand River Band of Ottawa Indians (Pub. L. 94-540, 90 Stat. 2503-2504);
- g. The first \$2,000 of per capita shares received from judgment funds awarded by the Indian Claims Commission or the U.S. Claims Court, the interests of individual Indians in trust or restricted land, including the first \$2000 per year of income received by individual Indians from funds derived from interests held in such trust or restricted lands (25 U.S.C. 1407);
- h. Amounts of scholarships funded under Title IV of the Higher Education Act of 1965 (20 U.S.C. 1070), including awards under Federal work-study program or under the Bureau of Indian Affairs student assistance programs (20 U.S.C. 1087uu). For Section 8 programs only (42 U.S.C. 1437f), any financial assistance in excess of amounts received by an individual for tuition and any other required fees and charges under the Higher Education Act of 1965 (20 U.S.C. 1001 et seq.), from private sources, or an institution of higher education (as defined under the Higher Education Act of 1965 (20 U.S.C. 1002)), shall not be considered income to that individual if that individual is over the age of 23 with dependent children (Pub. L. 109-115, section 327)(as amended);
- i. Payments received from programs funded under Title V of the Older Americans Act of 1985 (42 U.S.C. 3056(g));
- j. Payments received on or after January 1, 1989, from the Agent Orange Settlement Fund (Pub. L. 101-201) or any other fund established pursuant to the settlement in the *In Re Agent-* product liability litigation, M.D.L. No. 381 (E.D.N.Y.);
- k. Payments received under the Maine Indian Claims Settlement Act of 1980 (25 U.S.C. 1721);
- l. The value of any child care provided or arranged (or any amount received as payment for such care or reimbursements for costs incurred for such care) under the Child Care and Development Block Grant Act of 1990 (42 U.S.C. 9858q).
- m. Earned income tax credit (EITC) refund payments received on or after January 1, 1991 for programs administered under the United States Housing Act of 1937, title V of the Housing

SECTION 8 ADMISSION & OCCUPANCY POLICIES

Act of 1949, section 101 of the Housing and Urban Development Act of 1965, and sections 221(d)(3), 235, and 236 of the National Housing Act (26 U.S.C. 32(l));

- n. Payments by the Indian Claims Commission to the Confederated Tribes and Bands of Yakima Indian Nation or the Apache Tribe of Mescalero Reservation (Pub. L. 95-433);
- o. Allowances, earnings and payments to AmeriCorps participants under the National and Community Service Act of 1990 (42 U.S.C. 12637(d));
- p. Any amount of crime victim compensation (under the Victims of Crime Act) received through crime victim assistance (or payment or reimbursement of the cost of such assistance) as determined under the Victims of Crime Act because of the commission of a crime against the applicant under the Victims of Crime Act (42 U.S.C. 10602); and
- q. Allowances, earnings and payments to individuals participating in programs under the Workforce Investment Act of 1998 (29 U.S.C. 2931).
- r. Any amount received under the Richard B. Russell School Lunch Act (42 U.S.C. 1760(e)) and the Child Nutrition Act of 1966 (42 U.S.C. 1780(b)), including reduced-price lunches and food under the Special Supplemental Food Program for Women, Infants, and Children (WIC);
- s. Payments, funds, or distributions authorized, established, or directed by the Seneca Nation Settlement Act of 1990 (25 U.S.C. 1774f(b));
- t. Payments from any deferred Department of Veterans Affairs disability benefits that are received in a lump sum amount or in prospective monthly amounts as provided by an amendment to the definition of annual income in the U.S. Housing Act of 1937 (42 U.S.C. 1437A) by section 2608 of the Housing and Economic Recovery Act of 2008 (Pub. L. 110-289);
- u. Compensation received by or on behalf of a veteran for service-connected disability, death, dependency, or indemnity compensation as provided by an amendment by the Indian Veterans Housing Opportunity Act of 2010 (Pub. L. 111-269; 25 U.S.C. 4103(9)) to the definition of income

SECTION 8 ADMISSION & OCCUPANCY POLICIES

applicable to programs authorized under NAHASDA and administered by the Office of Native American Programs;

- v. A lump sum or a periodic payment received by an individual Indian pursuant to the Class Action Settlement Agreement in the case entitled *Elouise Cobell et al. v. Ken Salazar et al.*, 816 F. Supp. 2d 10 (Oct. 5, 2011 D.D.C.), as provided in the Claims Resolution Act of 2010 (Pub. L. 111-291); and
- w. Major disaster and emergency assistance received by individuals and families under the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Pub. L. 93-288, as amended) comparable disaster assistance provided by States, local governments, and disaster assistance organizations shall not be considered as income or a resource when determining eligibility for or benefit levels under federally funded income assistance or resource-tested benefit programs (42 U.S.C. 5155(d)).

Assets

Table 1-2:

A. Assets Include:

1. Amounts in savings accounts and six- or twelve-month average (whichever bank provides) balance for checking accounts. If a bank does not provide a 6 or 12-month average for checking accounts, the current balance will be used.
2. Stocks, bonds, savings certificates, money market funds and other investment accounts.
3. Equity in real property or other capital investments. Equity is the estimated current market value of the asset less the unpaid balance on all loans secured by the asset and reasonable costs (*such as broker fees*) that would be incurred in selling the asset.
4. The cash value of trusts that are available to the household.
5. IRA, Keogh and similar retirement savings accounts, even though withdrawal would result in a penalty.
6. Contributions to company retirement/ pension funds that can be withdrawn without retiring or terminating employment.

B. Assets Do Not Include:

1. Necessary personal property, except as noted in Column A; item 9 of this Table.
2. Interest in Indian Trust lands.
3. Assets that are a part of an active business or farming operation.

NOTE: Rental properties are considered personal assets held as an investment rather than business assets unless real estate is the family's main occupation.
4. Assets not accessible to the family and which provide no income for the family.
5. Vehicles especially equipped for the handicapped.
6. Equity in owner-occupied cooperatives and manufactured homes in which the family lives.

Counts as income:

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7. Assets, which, although owned by more than one person, allow unrestricted access by the applicant.	1. Actual income from assets if total assets are \$5,000 or less;
8. Lump sum receipts such as inheritances, capital gains, lottery winnings, insurance settlements, and other claims, deferred SSI and Social Security payments paid in a lump sum.	2. If assets are more than \$5,000, the greater of actual income from assets, or
9. Personal property held as an investment such as gems, jewelry, coin collections, antique cars, etc.	Total assets x Passbook Savings Rate established by the PHA in accordance with HUD guidelines.
10. Cash value of life insurance policies.	
11. Assets disposed of for less than fair market value during two years preceding certification or recertification.	

V. Verifying Applicants' Statements and Incomes

- Applicants shall be required to furnish proof of their statements when requested by the PHA.
- All eligibility determinations will be fully documented in the files.
- The PHA will utilize HUD's online "Upfront Income Verification" and "Enterprise Income Verification" (UIV/EIV) systems to the greatest extent feasible to verify employment, income and other eligibility information for all applicants and participants.

24 CFR
§5.233

- A. Applicant Releases:** Applicants are required to sign release forms that authorize necessary third party verifications that include, but are not limited to, income and assets. If sufficient verification for some or all income sources is obtained through HUD's online UIV/EIV system or third party documentation provided by the applicant, the applicant will not be required to sign release forms for those income sources.
- B. Documentation from Applicant:** Applicants are required to submit documentation to the PHA to verify statements related to program eligibility.
- C. Use of Confidential Information:** Information that is obtained directly from applicants or from those persons authorized by the applicant will be used or disclosed only for purposes relating directly to the administration of the Section 8 Program. All information that is "private data on individuals" under the Minnesota Government Data Practices Act (*Minn. Statutes Sec. 13.01 and following*) will be handled in compliance with that law. Information obtained from

SECTION 8 ADMISSION & OCCUPANCY POLICIES

HUD's online UIV/EIV systems will be used, stored and disposed of in compliance with HUD requirements.

- D. Family Composition and Residency:** Certification by applicants will normally be considered sufficient verification of family composition and residence as provided by the applicant's signature on the application. However, the PHA reserves the right to request additional verification.
- E. Income:** All earned and unearned income must be verified at the time of admission through third parties, which may include HUD's online UIV/EIV systems.
1. Written Third Party Verification. To the greatest extent feasible, income should be verified through acceptable documents that are generated by third parties, but are in the possession of and provided by the applicant.
 2. Verification Forms. If the applicant cannot provide acceptable third party documentation, the PHA may obtain the required verifications using forms sent to the third parties (employers, etc.).
 3. Oral Third Party Verification. If neither form of written verification can be obtained, the PHA may verify income information by contacting the income source(s) via telephone or in-person visit.
 4. Tenant Declaration. If none of the forms of third party verification listed above can be obtained, the PHA may at its discretion accept an affidavit or notarized statement by the applicant of reported income. Staff must document in the family's file the reason(s) why third party verification was not available.
 5. EIV Verification. Within 90 days after the subsidy start date, the family's earned income must be verified through HUD's online UIV/EIV systems.
 6. Preservation Vouchers. To facilitate the timely issuance of preservation vouchers to residents of a property that was formerly assisted under a contract between the owner and HUD for project-based rental assistance, the PHA may issue the preservation vouchers and calculate initial tenant rents and Housing Assistance Payments based on tenant income and other eligibility information that the property owner has already submitted to HUD's MTCS/PIC tenant data systems on the most recent form HUD-50059, "Owner's Certification of Compliance with HUD's Tenant Eligibility and Rent Procedures". The PHA

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will verify income for participants who have HUD-50059 forms dated earlier than 6 months from the effective date of conversion to tenant-based voucher assistance, but reserves the right to conduct a full-income review in any circumstance.

7. **Portability Vouchers.** For voucher participants “porting in” to St. Paul from another jurisdiction, the PHA may use the household composition and income information submitted by the sending housing agency on HUD’s Tenant Data Form (HUD-50058) rather than reverifying all of the information immediately. The PHA will verify income for participants who have HUD-50058 forms dated earlier than 6 months from the effective date of porting in, but reserves the right to conduct a full-income review in any circumstance.
- F. Assets:** If the total value of reported assets is \$5,000 or more, their value must be verified in the same manner as income (see above). The PHA may accept the applicant’s declaration of the amount of assets equal to or less than \$5,000, and the amount of income expected to be received from those assets. In such cases the PHA must verify the information in accordance with HUD guidance.
- G. No Income:** The absence of income will be verified through third parties where possible. Applicants reporting no income will be required to sign a statement certifying that they are receiving no income.
- H. Misrepresentation:** Any material misrepresentation on the part of an applicant revealed through the application process or otherwise, may result in a determination of ineligibility. The applicant shall be notified in writing of such determination by the PHA, and shall be given the opportunity to request an informal review of the matter.
- I. Domestic Abuse Certification:** The PHA may require a applicant or participant who is or claims to be a victim of domestic violence to provide a signed certification or other documentation. (See **Appendix M, VAWA Policy**).

VI. Eligibility Determination

- A. Verification of Statements:** Statements made by applicants on their application are verified, and a final determination of eligibility is made by the PHA before offering them rent assistance.
- B. Notification of Eligibility:** When evidence supports eligibility, applicants are notified in writing by the PHA.

§982.201

VII. Notification To Ineligible Families

A. Notice to Applicants: The PHA will give an applicant prompt written notice of a decision denying their assistance. This includes a decision denying placement on the PHA waiting list and/or the issuance of a Housing Choice Voucher. The notice must contain a brief statement of the reasons for the PHA decision. §982.201(f)

B. Informal Review: The notice shall also state that applicants may request an informal review of the decision and shall describe how to obtain the informal review. §982.554

The PHA will not provide an informal review in the following instances:

1. Discretionary administrative determinations by the PHA.
2. General policy issues or class grievances.
3. A determination of the family unit size under the PHA Subsidy Standards.
4. A PHA determination not to approve an extension or suspension of a voucher term.
5. A PHA determination not to grant approval to lease a unit under the program or to approve a proposed lease.
6. A PHA determination that a unit selected by the applicant is not in compliance with HQS.
7. A PHA determination that the unit is not in accordance with HQS because of the family size or composition.

(See **Appendix G. for Informal Review Procedure**).

PART TWO: APPLICANT SELECTION

I. Overview:

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| <p>A. Selecting Applicants: Applicants will be selected from the waiting list. Their place on the waiting list will be determined by two factors:</p> <ol style="list-style-type: none"> 1. Preference factors, and; 2. Date and time of application. | <p><u>Refer to:</u>
24 CFR
§982.204(a)</p> |
| <p>B. Single Waiting List: A single waiting list will be maintained for Vouchers.</p> | <p>§982.204(f)</p> |
| <p>C. Income Limits: All applicants initially selected for Section 8 Rental Assistance must have annual income anticipated for the next twelve months that is at or below the current income limit set for Very Low Income families. This income limit is based upon 50% of the median income for the area.</p> <p>In addition, not less than 75 percent of the families admitted to the Section 8 Program shall be targeted to families whose income does not exceed 30% of the median income for the area (Extremely Low Income).</p> <p>HUD may authorize Section 8 Rent Assistance for specific uses. Under these circumstances, assistance could be provided to families with low incomes, with annual income between 51-80% of median income for the area. Refer to Part One, Table 1-1 for current income limits.</p> | <p>§982.201(b)</p> <p>§982.201(b)(2)</p> |
| <p>D. Special Allocations: When HUD awards Section 8 funds for a specific category of applicants, the PHA will assist these households in accordance with HUD's special instructions.</p> | <p>§982.203
§982.204(e)</p> |

II. Definitions of Preferences and Related Terms

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| <p>Local preferences are used in selecting applicants for Section 8 Assistance. The St. Paul PHA has established five local preferences. These local preferences are as follows:</p> <ol style="list-style-type: none"> 1. Residency Preference: This preference is given to applicants whose head of household or spouse: <ol style="list-style-type: none"> a. Lives in Saint Paul; | <p>§982.207</p> <p>§982.207</p> |
|---|---------------------------------|

- b. Works in or has been notified that they have been hired to work in Saint Paul; or
 - c. Attends school or has been accepted to attend school in Saint Paul; or
 - d. Has been deemed as “homeless” through Ramsey County’s Coordinated Entry System.
- 2. **Veteran’s or Service Person Preference:** This preference is given to an applicant where any member of the household is a Veteran or a Service Person.
 - a. **“Veteran”** means any person who has served under the direction of the Armed Forces and clandestine forces of the United States.
 - b. A **“Service Person”** is part of an applicant’s family and is in the military forces of the United States at the time of application for housing. “Military forces” means the Army, Navy, Air Force, Marine Corps, Coast Guard and the commissioned corps of the U.S. Public Health Service.
- 3. **Preservation Preference:** This preference is given to current residents of a building approved by HUD for preservation or replacement vouchers.
- 4. **Project-Based Voucher (PBV) or Project-Based Assistance (PBA) Supportive Housing Preference:** This preference is given to applicants who have been approved to participate in a PHA PBV or PBA supportive housing program.
- 5. **Mainstream Preference:** This preference is given to applicants who have been approved to participate in a Mainstream Non-Elderly Disabled supportive housing program. The PHA receives referrals from pre-qualified partners for these 50 vouchers.
- 6. **Special Programs Preference:** This preference is given to applicants who have been approved to participate in a program for which the PHA has received a special allocation of vouchers; for example, Family Unification Program (FUP), Veterans Administration – Supportive Housing (VASH), etc.

7. **Move-Up Preference:** This preference is given to applicants who have been approved by the Ramsey County Continuum of Care to transition from Permanent Supportive Housing (PSH) to a Housing Choice Voucher. The PHA will request referrals from the Ramsey County Continuum of Care, and will limit this preference to a maximum of 100 vouchers.

III. General Policies Regarding Preferences

A. Use of Preferences:

1. **PBV Supportive Housing Preference:** Applicants who qualify for the PBV Supportive Housing Preference will receive 20 preference points.
2. **Preservation Preference:** Applicants who qualify for the Preservation Preference will receive 20 preference points.
3. **Special Programs Preference:** Applicants who qualify for the Special Programs Preference will receive 20 preference points.
4. **Mainstream Preference:** Applicants who qualify for the Mainstream Preference will receive 20 preference points.
5. **Move-Up Preference:** Applicants who qualify for the Move-Up Preference will receive 20 preference points.
6. **Residency Preference:** Applicants who qualify for a Residency Preference will receive four preference points. This includes those families who qualify as homeless, per the Coordinated Entry guidelines.
7. **Veteran's Preference:** Applicants who qualify for a Veteran's Preference will receive two preference points.
8. Applicants with **no preferences** are given the lowest priority for assistance. They will be housed according to the date and time of their application.

- B. **Denial of Preferences:** No preference of any kind will be given to an applicant if any member of the applicant's family was evicted during the past three years from housing assisted under the 1937 Housing Act Program because of drug-related criminal activity, except that the PHA may give an admission preference if the PHA determines that the evicted person:

§982.553

1. Has successfully completed a rehabilitation program approved by the PHA;
2. Clearly did not participate in or know about the drug-related criminal activity, or;
3. No longer participates in any drug-related criminal activity.

C. Changes in Preference Status: Occasionally families on the waiting list who did not qualify for a preference at the time they applied for rental assistance will experience a change in circumstances that now qualifies them for a preference. In such instances:

1. It is the family's responsibility to contact the PHA.
2. Families certifying that they now qualify for a preference will be repositioned on the waiting list in accordance with their new preferences and their date and time of application.

IV. Offering Assistance

When an applicant's name rises to the top of the list in accordance with PHA policies, they will be offered the next available Voucher. If funds are not sufficient to house the family at the top of the waiting list in accordance with the PHA subsidy standards, no additional Vouchers will be issued until sufficient funds are available to cover the cost of the family's assistance. §982.204

A. When the PHA selects a family to participate in the Section 8 Program, the PHA must give the family an oral briefing. The briefing must include information on the following subjects: §982.301

1. A description of how the program works;
2. Family and owner responsibilities; and
3. Where the family may lease a unit, including renting a unit inside or outside the PHA's jurisdiction.

B. For a family that qualifies to lease a unit outside the PHA's jurisdiction under portability, the briefing must include an explanation of how portability works.

C. If the family is currently living in a high poverty census tract in the PHA's jurisdiction, the briefing must explain the advantages

of moving to an area that does not have a high concentration of families living in poverty.

- D.** In a briefing that includes any disabled person, the PHA must take appropriate steps to ensure effective communication.
- E.** The PHA provides briefings to individuals or groups.
- F.** Spoken word and American Sign Language interpreters are available as needed. The PHA will inform applicants that interpreters must be requested prior to the scheduled meeting.
- G.** Family members, representatives, and service providers who assist families with special needs are encouraged to attend briefings.
- H. Information Packet:** An information packet will be handed out to the family at the briefing. It includes information on the following subjects: §982.301(b)
 - 1. The term of the Voucher (*how long the family has to locate a suitable unit to rent*), and the PHA policy on any extensions or suspensions of the term. The packet must explain how the family can request an extension.
 - 2. How the PHA calculates the housing assistance payment for a family including;
 - a. How the PHA determines the payment standard for a family;
 - b. How the PHA determines the Total Tenant Payment for a family;
 - c. Information on the Payment Standards and the PHA Utility Allowance Schedule, and the 40% affordability restriction.
 - 3. How the PHA determines the maximum rent for an assisted unit;
 - 4. What the family should consider in deciding whether to lease a unit, including:
 - a. The condition of a unit;
 - b. Whether the rent is reasonable;

- c. The cost of any tenant-paid utilities and whether the unit is energy-efficient; and
 - d. The location of the unit, including proximity to public transportation, centers of employment, schools and shopping;
- 5. Where the family may lease a unit. For a family that qualifies to lease a unit outside the PHA jurisdiction under portability procedures, the information packet must include an explanation of how portability works;
- 6. The HUD-required “tenancy addendum.” The tenancy addendum is language that must be included in the lease;
- 7. The Request for Tenancy Approval Form, and an explanation of how to request PHA approval to lease a unit;
- 8. A statement of the PHA policy on providing information about a family to prospective owners;
- 9. PHA Subsidy Standards (how many persons can live in each size unit), including when the Housing Authority will consider granting exceptions to the standards;
- 10. The HUD brochure on how to select a unit;
- 11. The HUD brochure on lead-based paint;
- 12. Information on federal, state and local equal opportunity laws, and a copy of the HUD Housing Discrimination Complaint form;
- 13. A list of landlords or other parties known to the PHA who may be willing to lease a unit to the family, or help the family find a unit;
- 14. Notice that if the family includes a person with disabilities, the family may request a current listing of accessible units known to the PHA that may be available;
- 15. Family obligations under the program;
- 16. The grounds on which the PHA may terminate assistance for a participant family because of family action or failure to act; and

17. PHA informal hearing and review procedures: This information will describe when the PHA is required to give a participant family the opportunity for an informal review, and how to request a review.
18. A notice about the Violence Against Women and Justice Department Reauthorization Act of 2005 (“VAWA”), that protects qualified applicants and tenants and family members of qualified applicants and tenants who are victims of domestic violence, dating violence, or stalking from being evicted or terminated from housing assistance based solely on acts of such violence against them.

V. Monies Owed To A Housing Authority

The following policies apply to any monies owed to the PHA or another Housing Authority by current and former Public Housing residents and Section 8 participants.

§982.552(c)(v)

The PHA utilizes HUD’s online EIV system to determine whether an applicant owes money to another housing authority. The PHA also reports information through EIV about debts owed to this agency by former public housing residents and participants in the Section 8 Housing Choice Voucher Program.

A. Debt to Saint Paul PHA: When an applicant owes money to this PHA from previous Public Housing residency or Section 8 participation, the PHA may, at their sole discretion, either deny the application, or require the applicant to repay that amount in full, or require the applicant to enter into a Payment Agreement before being admitted.

1. To be eligible to enter into a Payment Agreement, the applicant must first demonstrate to the satisfaction of the PHA that they cannot pay the debt in full at the time of application.
2. Payment Agreements require a **minimum payment of \$25 a month** on each claim for monies owed until the balance owed is paid in full.
3. The repayment agreement shall require payment in full of the balance owing within twelve months, absent extraordinary circumstances.

B. Debt to Another Housing Authority. When an applicant owes money to another housing authority from previous public housing residency or Section 8 participation, the applicant will not be admitted without providing proof that the debt has been repaid in

full, or the applicant has entered into a Payment Agreement with the other housing authority and is current on the payments.

- C. Consequences of Default:** Section 8 assistance may be denied or terminated if a family does not comply with the terms of a Payment Agreement. In addition, if the family is no longer assisted by Section 8, the balance owing may be submitted for recovery to the State Department of Revenue – Revenue Recapture Program. Names that have been submitted to the Revenue Recapture Program will be withdrawn if a former tenant is readmitted to the Section 8 Program and a new Payment Agreement is executed.

VI. Time Frame To Find A Suitable Unit

- A. Initial Issuance:** Applicants who are issued a Voucher have a period of 60 days (*called the initial term*) in which to locate a suitable unit and notify the PHA of their intent to enter into a lease with an owner. §982.303
- B. Extensions of Term:**
1. A voucher holder who cannot find a suitable unit within 60 days after a Voucher is issued, but who intends to continue to look for one, must request in writing an extension from the PHA before the voucher has expired. The PHA will grant a family one 60-day extension unless the PHA has suspended voucher issuances due to current or projected overutilization of vouchers. §982.303(b)
 2. An additional 60-day extension may be granted to a participant family that needs and request more time as a reasonable accommodation for a family member who is person with a disability, or if the family wishes to use their voucher outside of St. Paul and receiving housing agency has asked the PHA to extend the voucher. The request must be made before the family's voucher has expired.
- C. Suspension of Term:** The PHA will grant a family a suspension of the Voucher term if the family has submitted a Request for Tenancy Approval during the term of the Voucher. A suspension means that the PHA will “stop the clock” on the term of the Voucher from the time when the family submits a Request for Tenancy Approval to lease a unit, until the time when the PHA approves or denies the request. §982.303(c)

VII. Public Housing Residents Requesting Section 8 Assistance

- A. Residents with Special Housing Needs:** Residents of Public Housing are permitted to request a transfer to the Section 8 Program even when the Section 8 waiting list is closed to new applicants. They will be required to apply for a transfer in accordance with PHA policies on transfers. If their request is approved, the resident's name will be placed on a Section 8 Transfer Waiting List according to the date of the transfer approval. As Vouchers become available, these families will receive the next available form of assistance in rotation with applicants from the Section 8 Program waiting list who are currently not receiving any form of rental assistance.

VIII. Non-Discrimination In Applicant Selection

- A. No Discrimination:** The PHA will not discriminate against any applicant for public housing due to race, color, religion, creed, national origin or ancestry, sex, age, handicap, disability, receipt of public assistance, marital status, sexual or affectional orientation, or political or other affiliation.
- B. No Preferential Treatment:** No preference will be given to an applicant because of political affiliation or his or her acquaintance with any public official at the federal, state or local level.

§982.202(b)
Minn. Stat.
§363A.09, Subd 1
(1)-(2)
St. Paul Leg.
Code (SPLC),
Chapter 183

IX. Applicants Ineligible For A Preference

When an applicant has claimed a preference in their application, and the information provided by the applicant shows that the necessary criteria cannot be met, the PHA shall do the following:

- A.** Promptly notify the applicant in writing of the determination and briefly state the reasons they are ineligible for the preference. The notification will offer the applicant an opportunity to meet with a PHA-designated representative to review the determination. The request to discuss the determination must be made in writing within 10 days of the date of the notification letter.
- B.** The PHA-designated representative may be an officer or employee, including the staff person who made or reviewed the determination.

X. Misrepresentation

Any material misrepresentation on the part of an applicant revealed through the application process or otherwise, may result in a determination of ineligibility. The applicant shall be notified in writing of such determination by the PHA, and will be given the opportunity for an informal review of the matter.

Part Three:

Rent Calculations

- | | | |
|-----|---|-----------------------------------|
| I. | Overview: The amount of rent paid by Section 8 participants will vary depending on the family income, rent to owner, minimum rent requirements and hardship waivers. | <u>Refer to:</u>
24 CFR |
| A. | The program has a minimum amount of rent a tenant must pay. Adjusted monthly income is used in calculating the rent to a minimum level of \$50. | \$5.630 |
| | 1. A family may request a hardship waiver of the \$50 minimum rent payment. (See Appendix C.) | |
| B. | Adjusted Household Income is annual income minus allowances for dependents and certain expenses to care for children and handicapped household members. Elderly and disabled households have an additional allowance and may also deduct certain medical expenses. | \$5.611 |
| C. | No Duplicate Subsidy is allowed for either form of assistance. This means that no household, while being assisted by a Section 8 Voucher, may receive one of the following: | \$982.352 |
| | 1. Other Section 8 housing assistance programs; | |
| | 2. Section 236 Rental Assistance Deep Subsidy Payments, OR; | |
| | 3. Other duplicative public housing, federal, state or local housing subsidy. | |
| II. | Total Tenant Payment: In calculating the rental assistance available to tenants, the PHA must use a formula, called a Total Tenant Payment , commonly abbreviated as “TTP.” Adjusted monthly income is one of the factors in the formula. | \$5.628 |
| A. | Formula for Calculating TTP: Total Tenant Payment is the highest payment resulting from the following four options: | |

SECTION 8 ADMISSION AND OCCUPANCY POLICIES

Total Tenant Payment		
1.	10% of total Gross Monthly Household Income; OR	
2.	30% of total Monthly Adjusted Household Income; OR	§5.611
3.	If a household receives assistance under the Minnesota Supplemental Assistance program (MSA), that portion is designated for shelter and utility costs; OR	
4.	\$50.00 minimum rent. It is possible for families to still qualify for a utility reimbursement despite the \$50.00 minimum rent requirement. For example, if a family's TTP is the minimum \$50.00 and the PHA's utility allowance is \$60.00 for that unit, the family would receive a utility reimbursement of \$10.00 for tenant-purchased utilities. <i>(See Appendix C for Minimum Rent Hardship Waiver Policy).</i>	

B. Gross Monthly Household Income is calculated by:

1. Determining the annual income (as defined in Part One of this document), and;
2. Dividing it by twelve.

C. Monthly Adjusted Household Income is calculated by:

1. Determining the annual income (as defined in Part One of this document), and;
2. Adjusting it by subtracting the deductions shown below; and;
3. Dividing it by twelve.

Deductions Available to all Households	
<ul style="list-style-type: none"> • \$480 for each dependent who is a member of the household. • Reasonable child care expenses for household members under the age 13 that enable a household member to have paid employment or go to school. • Handicapped assistance expenses in excess of 3% of annual income threshold. Once that threshold has been met, all eligible handicapped and medical expenses in excess of 3% of annual income are deductible. 	\$5.611
Deductions Available to Elderly and Disabled Households Only	
<ul style="list-style-type: none"> • \$400 per elderly household when the head or spouse is at least age 62, or is handicapped or disabled. Only one deduction per household may be taken even if both members are over age 62 or handicapped or disabled. • Anticipated medical expenses in excess of 3% of annual income. All household members' medical expenses are included in this calculation. • Elderly households may combine their handicapped assistance expenses and medical expenses to reach the 3% of annual income threshold. Once that threshold has been met, all eligible handicapped assistance and medical expenses in excess of 3% of annual income are deductible. 	

D. Deductions and Related Definitions:

1. An **elderly household** is a family whose head or spouse, or only member, is at least age 62 or who is a person with a disability.
2. **“Dependent”** is defined as:
 - a. A person who is under 18 years of age, or
 - b. A person with a disability, or \$5.611
 - c. Full-time students who are over the age of 18 and are members of the household. They are considered a member of the household if they live in the household during the school term. They must carry \$5.403

SECTION 8 ADMISSION AND OCCUPANCY POLICIES

a full-time subject load at an educational institution with a degree or certification program. The institution defines what is a full-time subject load.

d. The definition of “**Dependent**” does not include: §5.603

- 1) The Family Head or Spouse;
- 2) Foster children; or
- 3) Foster adults.

3. **A Person with a Disability** is a person with disabilities as defined in 42 U.S.C. § 423 or who has developmental disabilities as defined in 42 U.S.C. § 15002 (8)(A). The following is a summary of these requirements:

- a. 42 U.S.C. § 423 defines a disability as: **(A)** inability to engage in any substantial gainful activity by reason of any medically determinable physical or mental impairment which can be expected to result in death or which has lasted or can be expected to last for a continuous period of not less than 12 months; or **(B)** in the case of an individual who has attained the age of 55 and is blind (within the meaning of “blindness” as defined in [section 416\(i\)\(1\)](#) of this title), inability by reason of such blindness to engage in substantial gainful activity requiring skills or abilities comparable to those of any gainful activity in which he has previously engaged with some regularity and over a substantial period of time.
- b. 42 U.S.C. § 15002 (8)(A) defines developmental disability as: **(8) Developmental disability**
(A) In general
The term “developmental disability” means a severe, chronic disability of an individual that--
 - (i) is attributable to a mental or physical impairment or combination of mental and physical impairments;
 - (ii) is manifested before the individual attains age 22;
 - (iii) is likely to continue indefinitely;
 - (iv) results in substantial functional limitations in 3 or more of the following areas of major life activity:
 - (I)** Self-care.
 - (II)** Receptive and expressive language.
 - (III)** Learning.
 - (IV)** Mobility.

SECTION 8 ADMISSION AND OCCUPANCY POLICIES

(V) Self-direction.

(VI) Capacity for independent living.

(VII) Economic self-sufficiency; and

(v) reflects the individual's need for a combination and sequence of special, interdisciplinary, or generic services, individualized supports, or other forms of assistance that are of lifelong or extended duration and are individually planned and coordinated.

(B) Infants and young children

An individual from birth to age 9, inclusive, who has a substantial developmental delay or specific congenital or acquired condition, may be considered to have a developmental disability without meeting 3 or more of the criteria described in clauses (i) through (v) of subparagraph (A) if the individual, without services and supports, has a high probability of meeting those criteria later in life.

c. **Review of Disability.** The PHA may review a participant's disability status during their participation in the voucher program, if there is reason to believe that the participant is no longer a person with disability as defined above.

4. **A Person with disabilities means** an “individual with handicaps”, as defined in § 8.3 of this title, for purposes of reasonable accommodation and program accessibility for persons with disabilities. **§5.403(4)**
5. **Disability assistance expenses** are reasonable expenses that are anticipated, during the period for which annual income is computed, for attendant care and auxiliary apparatus for a disabled family member and that are necessary to enable a family member (including the disabled member) to be employed, provided that the expenses are neither paid to a member of the family nor reimbursed by an outside source. **§5.603(b)**
6. **Child care expenses** are amounts anticipated to be paid by the family for the care of children under 13 years of age during the period for which annual income is computed, but only where such care is necessary to enable a family member to actively seek employment, be gainfully employed, or to further his or her education and only to the extent such amounts are not reimbursed. The amount deducted shall reflect reasonable charges for child care. In the case of child care necessary to permit employment, the amount deducted shall not exceed the **§5.603(b)**

SECTION 8 ADMISSION AND OCCUPANCY POLICIES

amount of employment income that is included in annual income.

7. **Medical expenses** are anticipated medical costs, including medical insurance premiums that are not covered by insurance. Only elderly and disabled households are eligible for this deduction. Examples of eligible medical expenses are:
 - a. Prescription and non-prescription medicines,
 - b. Transportation to medical treatment,
 - c. Physicians and other health care professional services,
 - d. Dental expenses, eyeglasses, hearing aids and batteries,
 - e. Medical care of a permanently institutionalized family member if that person's income is included in the family's gross annual income calculation.

III. **Utility Allowances:** The PHA determines an allowance for any tenant-paid utilities based upon normal consumption by an energy-conscious household.

- A. The utility allowance includes electricity, gas, water, sewer and charges for other services such as garbage removal. These figures are updated annually and are adjusted by the size of the unit, type of the building, and the type of utility. \$5.603
\$5.611
- B. The utility allowance does not include telephone or cell phone, cable TV or internet service.
- C. The current schedule of Saint Paul PHA's Utility Allowances is found in Table 3-1.
 1. **Utilities Paid by Tenants:** If utilities, or a portion of them, are not included in the rent, the appropriate utility allowances are subtracted from the Total Tenant Payment (TTP) to determine the actual Tenant Rent. The tenant is responsible for paying the cost of utilities directly to the service providers. \$982.517
 2. **Utility Reimbursement:** When TTP is less than the PHA utility allowance, the PHA will pay the difference to the tenant each month. The payment will continue until the TTP

SECTION 8 ADMISSION AND OCCUPANCY POLICIES

is recalculated and the family no longer qualifies for a utility reimbursement.

The PHA has the option to pay the utilities directly or require the family to co-sign the utility reimbursement and issue it jointly to the utility company.

Table 3-1

SECTION 8 EXISTING HOUSING

ALLOWANCES FOR TENANT-FURNISHED UTILITIES AND OTHER SERVICE

EFFECTIVE - November 1, 2018 (new/movers) & January 1, 2019 (annuals)

M= Multiple Dwelling (Includes Low-Rise Bldgs (<4 stories) and High Rise Bldgs (>5 stories))

T/D= Townhouse/Duplex (Includes Semi-Detached, Bungalows and Rowhouses)

SF= Single Family Home

UTILITY/ APPLIANCE	0-BR	1-BR			2-BR			3-BR			4-BR			5-BR	6-BR
		M	T/D	SF	M	T/D	SF	M	T/D	SF	M	T/D	SF		
HEATING	33	35	47	64	59	69	90	67	86	100	94	101	114	138	152
Gas															
District Energy	23	42	42	53	61	61	72	66	66	82	84	84	100	89	93
Electric	24	31	63	79	42	72	123	58	80	119	67	91	130	140	144
COOKING	5	6			11			13			14			15	16
Gas															
Electric	7	8			13			15			17			19	21
OTHER ELECTRIC	14	22			35			45			50			52	58
WATER HEATING	8	9			17			21			25			27	31
Gas															
District Energy	7	14			21			21			30			30	33
Electric	11	13			21			25			32			42	45
WATER & SEWER	25	35	49	49	40	53	53	45	62	62	50	75	75	83	97
TRASH COLLECTION	10	10	25	25	10	34	34	10	36	36	10	36	36	36	36
RANGE	4	4			4			4			4			4	4
REFRIGERATOR	5	5			5			5			5			5	5

SECTION 8 ADMISSION AND OCCUPANCY POLICIES

IV. **Section 8 Rent Terms:** There are four terms used in the program to define different rent concepts:

- A. **Contract Rent:** This is the total amount of rent an owner charges for a unit occupied by a family being assisted by Section 8. It is the amount that will be listed in the Housing Assistance Payment contract and the Lease Agreement. \$882.102
- B. **Gross Rent:** This is the total of the Contract Rent plus the utility allowance. If there is no utility allowance because the contract rent includes all utilities, the Gross Rent and the Contract Rent will be the same amount. \$982.4
- C. **Family Rent to Owner:** This is the portion of rent to owner paid by the family. \$982.515
- D. **Family Share:** The portion of rent and utilities paid by the family.

V. **Voucher Program Rents**

- A. **Payment Standards:** The PHA's share of the rent (*referred to as "subsidy"*) is set by a formula which uses a Payment Standard instead of the Fair Market Rent (FMR).
 - 1. The PHA establishes Payment Standards by number of bedrooms. The Payment Standard for the family must be the lower of:
 - a. The Payment Standard for the family's voucher size; or
 - b. The Payment Standard for the unit size actually rented by the family.
 - 2. Payment Standards are set between 90% and 110% of the FMR.
 - 3. If the PHA has established an exception rent area, the Payment Standard used for a Voucher calculation becomes the appropriate exception rent only for a unit leased in the exception rent area.
 - 4. The PHA may approve, on a case-by-case basis, an exception rent up to 120% of the applicable Payment Standard as a reasonable accommodation for a disability. The PHA will evaluate the reasonableness of the rent and the extent to which the unit accommodates the disability in making its decision to approve these exception rents.

SECTION 8 ADMISSION AND OCCUPANCY POLICIES

- B. Family Share:** The following describes the process for determining the Family Rent:
1. The tenant family's Total Tenant Payment (TTP) is first calculated. \$5.628
 2. The maximum amount of subsidy the family can receive is the lower of: \$982.505
 - a. The Payment Standard minus the TTP; or
 - b. The gross rent minus the TTP.
 3. The family rent to owner is calculated by subtracting the housing assistance payment to the owner from the rent to owner. \$982.515
- C. Selected Unit:** The tenant may choose a unit that rents for more or less than the Payment Standard. If the unit rents for more than the Payment Standard, the tenant will pay more than the TTP as their share for rent. The subsidy will remain the same if the unit rents for more or less than the Payment Standard.
- However, at the time the PHA approves a tenancy for initial occupancy of a dwelling unit, the family share must not exceed 40% of the family's monthly adjusted income. \$982.508
- D. Size of Unit:** Units must meet Section 8 Housing Quality Standards in order to be eligible. \$982.401
1. The PHA will not prohibit a family from renting a unit with greater or fewer bedrooms than the number stated on the Voucher. \$982.402
 - a. The unit must meet the applicable HQS space requirements.
 - b. A decision to rent a larger unit with a Contract Rent above the Payment Standard may require the family to pay more than 30% of adjusted income for rent and utilities.
 - c. The selected unit must meet the PHA's Subsidy Standards (*formerly called "Occupancy Standards"*).
- E. Payment Standard Changes:** The Payment Standard that applies to a household when their initial lease is approved, or \$982.505(b)4,5

SECTION 8 ADMISSION AND OCCUPANCY POLICIES

at the time of their most recent annual Reexamination, will continue to be used to determine the amount of subsidy they will receive unless one of the following applies:

1. If the payment standard increased during the HAP contract the new payment standard will be used to calculate the assistance payment for the family beginning with the family's first regular re-examination on or after the effective date of the increase in payment standards.
2. Irrespective of any change to the payment standards during the HAP contract, if the family unit size increased or decreases, the new family unit size must be used to determine the payment standard amount for the family beginning at the family's first regularly scheduled re-examination following the change in family unit size.

F. Current Payment Standards: The Housing Voucher Payment Standard Schedule for rental units in the City of Saint Paul is as follows:

Table 3-3.	
PAYMENT STANDARDS	
UNIT SIZE:	AMOUNT:
0 Bedroom	\$ 915
1 Bedroom	\$ 1085
2 Bedroom	\$ 1,345
3 Bedroom	\$ 1,760
4 Bedroom	\$ 2,155
5 Bedroom	\$ 2,475
6 Bedroom	\$ 2,800

These payment standards are effective on February 1, 2021 for all current applicants, shoppers, and current participants with annual recertifications of eligibility that are effective on that date or later.

PART FOUR: UNIT SELECTION

I. OVERVIEW

Refer to:
24 CFR

When a Section 8 applicant receives a Voucher, it is the applicant's responsibility to find a unit that is owned by someone willing to participate in the Section 8 Program. The unit must:

- A. **Meet Subsidy Standards:** Is suitable for the family size, given Saint Paul PHA's Subsidy Standards; §982.402
- B. **Meet HQS:** Is decent, safe, and sanitary and will meet Section 8 Housing Quality Standards (HQS); and
- C. **Meet Rent Reasonableness Test:** Has a rent that is reasonable for the market area and amenities. §982.507

II. "FINDER'S KEEPERS" POLICY

- A. **Location of Unit:** A holder of a Voucher may select a rental unit in any area within Saint Paul or another area according to established portability procedures. §982.353
- B. **Saint Paul Choices:** The PHA will not take action, direct or indirect, to reduce the household's opportunity to choose among available units in the City of Saint Paul's housing market. §982.353(f)
- C. **Assisting the Unit Currently Occupied:** A Voucher holder may select the dwelling unit which they currently occupy if it meets Section 8 requirements. §982.353(e)

III. ELIGIBLE TYPES OF HOUSING

There are many housing options available to Section 8 Voucher holders. The following list includes examples of eligible types of rental housing, but participants are not limited to these: privately owned apartments in multi-family buildings, single-family houses, duplexes, triplexes, or fourplexes.

IV. SUBSIDY STANDARDS

- A. **Matching Unit Size to Family Size:** Subsidy Standards are established by the PHA to determine the appropriate number of bedrooms and amount of subsidy for families of different sizes and compositions. §982.402

SECTION 8 ADMISSION & OCCUPANCY POLICIES

1. Subsidy Standards have two purposes:
 - a. To maximize the use of Section 8 resources in order to assist the greatest number of eligible families.
 - b. To prevent overcrowding that results from placing a household in a dwelling unit that is too small for the family size.
2. The **minimum** and **maximum** occupancy levels acceptable for Saint Paul's Section 8 Program are as follows:

Table 4-1: SUBSIDY STANDARDS		
Dwelling Unit Size	Minimum Occupancy	Maximum Occupancy
0-Bedroom	1 Person	1 Person
1-Bedroom	1 Person	4 Persons
2-Bedrooms	2 Persons	6 Persons
3-Bedrooms	3 Persons	8 Persons
4-Bedrooms	4 Persons	10 Persons
5-Bedrooms	5 Persons	12 Persons
6-Bedrooms	6 Persons	14 Persons

3. In issuing Vouchers, the PHA will determine the appropriate unit size by applying the following criteria:

§982.402

 - a. The bedroom size assigned should not require more than two persons to occupy the same bedroom.
 - b. The age, sex and relationship of members of the household will be taken into consideration in assigning unit sizes. Minors of the opposite sex, who are six years of age or older, will not be required to share the same bedroom.

§982.401(d)

B. Exceptions: At the request of the participant, the Section 8 Programs Manager will consider exceptions to the Subsidy Standards. Such a request will be approved if the Programs Manager agrees that the proposed variance:

SECTION 8 ADMISSION & OCCUPANCY POLICIES

1. Is necessary to provide additional space needed by the household that is not provided for in the PHA's Subsidy Standards and Policies. This may include a request for a larger unit size due to a medical need or family hardship. It will be the responsibility of the applicant or participant to provide third-party verification documenting the need to the satisfaction of the PHA. §982.402
2. Will result in the household occupying a dwelling unit smaller than the Subsidy Standards and the size of the unit continues to meet the HQS space requirements.

C. Informal Hearing Based on Subsidy Standards: (*See Appendix G.*). The PHA will grant an informal hearing on a PHA decision affecting a participant family in the following cases:

1. If the PHA determines that a participant family is residing in a unit with a larger number of bedrooms than appropriate under the PHA standards and the PHA denies the family's request for an exception from the standards; or;
2. If the PHA determines that a participant family choosing to move to another unit with continued assistance is now eligible for a different unit size.

V. LEASING A UNIT

A. "Shopping" Assistance:

1. A list of possible units for rent from participating owners is available in the PHA Rental Office.
2. If requested, the PHA will assist an applicant or a participant who, because of age, handicap, or other reason cannot find an acceptable unit. PHA staff will refer applicants and participants to owners willing to participate in the program.
3. The PHA will assist applicants or participants who allege illegal discrimination in locating suitable housing. The PHA will also give the family information on how to fill out and file a housing discrimination complaint. §982.304

B. Request for Lease Approval: Before an applicant or participant can enter into a Section 8 Assisted Lease with the rental unit owner, he or she must submit a Request for Lease Approval to the PHA. §982.302(d)

SECTION 8 ADMISSION & OCCUPANCY POLICIES

- C. Review of Request:** After receiving the family's Request for Lease Approval, the PHA will promptly review it for compliance with the requirements stated below. The PHA will promptly notify the family whether the assisted tenancy is approved.
- D. Unit Approval:** The PHA may give approval for the family to lease a dwelling unit and execute a Housing Assistance Payment contract with an owner when the following requirements are met: §982.305
1. The unit is eligible;
 2. The unit has been inspected by the PHA and meets HQS;
 3. The lease is approvable and includes the tenancy addendum language required by HUD;
 4. The rent is reasonable;
 5. The unit is not owned by a parent, child, grandparent, grandchild, sister or brother of any member of the family, unless the PHA has determined that approving rental of the unit would provide a reasonable accommodation for a family member who is a person with disabilities; and
 6. The family share does not exceed 40 percent of the family's monthly adjusted income.
- E. Owner Approval:** The PHA will review information provided by HUD and/or the federal government to ensure that an owner of a proposed unit has not been suspended from participation due to violations of the Fair Housing Act, equal opportunity requirements or other program regulations. §982.306

At its discretion, the PHA may deny approval to lease a unit from an owner for any of the following reasons:

1. The owner has violated obligations under a housing assistance payments contract under Section 8 of the 1937 Housing Act;
2. The owner has committed fraud, bribery or any other corrupt or criminal act in connection with any federal housing program;

SECTION 8 ADMISSION & OCCUPANCY POLICIES

3. The owner has engaged in any drug-related criminal activity or any violent criminal activity.
4. The owner has a history or practice of non-compliance with the HQS for units leased under the tenant-based program, or with applicable housing standards for units leased under any other federal housing program;
5. The owner has a history or practice of renting units that fail to meet state or local housing codes;
6. The owner has not paid state or local real estate taxes, fines or assessments; or
7. The owner has a history or practice of failing to terminate the tenancy of Section 8 tenants for activity by any member of the household or guests of the household that is violent or drug-related activity or that threatens the health, safety or right to peaceful enjoyment of other tenants, employees, or persons living adjacent to the unit.

F. Owner Responsibility for Tenant Screening: At or before the PHA approval to lease a unit, the PHA will inform the owner that it has not screened the family's behavior or suitability for tenancy and that such screening is the owner's responsibility. §982.307

1. The PHA will give the owner the family's current address as listed in PHA records and the name and address if known, of the landlord at the family's current and prior address.
2. The PHA will inform the owner that an incident or incidents of actual or threatened domestic violence, dating violence or stalking, where the applicant or tenant is the victim of such criminal activity, is not an appropriate basis for denial or termination of a lease.

G. Housing Quality Standards (HQS) Inspection: If unit information on the Request for Lease Approval meets general program requirements, the PHA will inspect the unit to determine if it meets HQS. §982.305
§982.401

1. If the unit passes the initial inspection, the PHA will notify the applicant or participant.
2. If the unit fails the HQS inspection, the PHA will notify

SECTION 8 ADMISSION & OCCUPANCY POLICIES

the owner and applicant or participant with a letter citing the HQS deficiencies.

- a. If the owner makes necessary repairs, they must notify the PHA to request a follow-up inspection.
 - b. If the unit passes the follow-up inspection, the PHA will notify the applicant or participant. For all initial inspections of units that were not previously assisted, a physical reinspection is required to verify that all cited HQS deficiencies have been corrected.
 - c. For project based vouchers (PBV), the PHA is required to conduct follow-up inspections to confirm that the HQS deficiency is corrected. 24 CFR 983.103(e)(2)
 - d. For other annual and interim inspections, when only non-life-threatening HQS deficiencies have been cited, the PHA may approve the unit without physically reinspecting the unit, if the owner certifies that the deficiencies have been corrected and provides documentation that is satisfactory to the PHA. The PHA may consider the following factors in making that determination: PIH 2011-29
 - i. Whether the property received an “A” rating on its most recent Fire Certificate of Occupancy;
 - ii. Whether the owner has cooperated with PHA inspectors in the past by promptly repairing HQS deficiencies before reinspections;
 - iii. The quality of the documentation provided by the owner; and
 - iv. Other factors that demonstrate the owner’s ability and willingness to make timely repairs.
 - e. If the owner is unwilling or unable to make necessary repairs, the applicant or participant must find a different unit in order to receive Section 8 assistance.
3. **Window screens.** All openable windows below the fourth floor must have screens.
 4. **Fire Safety Standards. “Double-deadbolt” locks prohibited.** Exterior doors must not require an inside key to open.

5. Fire Safety Standards: Escape (Egress) Windows.

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- a. **Escape window.** At least one (1) emergency escape and rescue window or exterior door opening in every room used for sleeping purposes must meet the standards of the City of Saint Paul in its Building and Housing Code, as interpreted by City officials.
- b. **Fire Certificate of Occupancy.** The issuance of a Fire Certificate of Occupancy by the City of Saint Paul to a property owner, after a City inspection of the unit to be assisted, demonstrates that the unit complies with the City's requirements for egress windows.
- c. **Prior Replacement Under Permit.** If the egress windows were replaced pursuant to a City permit before April 28, 2009, the City deems the windows to comply with current standards.
- d. **Previous approval.** A unit's egress windows shall be deemed acceptable under HQS if they were approved by City staff pursuant to an inspection (window referral inspection or other) after July 1, 2008, or were permitted under a variance approved after that date.
- e. **Reasonable time to comply.** If a unit otherwise qualifies for Section 8 assistance in all respects, the PHA may pay the HAP subsidy retroactively for up to 60 days, if within that period of time the property owner modifies or replaces the cited egress window(s) or gets City approval as meeting the City's standard, or if the City grants the owner more time to comply. The PHA will not make any retroactive payment if the unit does not meet all other Section 8 requirements during that period or if the owner replaces or modifies the window or receives City approval more than 60 days after a PHA inspector cites the egress window(s) as not meeting the City and HQS standard.

City Code
Sec. 34.13(4)

- H. Executing a Lease:** The Lease between the tenant and owner, including any new lease or lease revision, must be approved in advance by the PHA. Before approving the lease or revision, the PHA must determine that the lease includes the required lease provisions and that the tenant has the legal capacity to enter into a lease.

§982.308
§982.309

The owner must furnish or execute his or her own lease document, and the Section 8 tenancy addendum must be made a part of that lease.

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The PHA and the owner must enter into a new Housing Assistance Payment Contract for the tenancy under a new lease.

The PHA will attempt to execute the Housing Assistance Payments Contract with the owner prior to the beginning of the lease term. The Housing Assistance Payment Contract will be executed no later than 60 calendar days from the beginning of the lease term.

The PHA will not pay any housing assistance payment to the owner prior to the effective date of the Housing Assistance Payment Contract.

VI. RENT REASONABLENESS

Section 8 Program regulations require that the PHA make a determination prior to entering into a Housing Assistance Payment contract that the rent being charged for the unit is reasonable. Rent reasonableness must also be determined during the term of the lease if the rent increases, if the FMR decreases by 5%, or if directed by HUD. §982.507

A. Factors Considered: When a participant submits a Request for Lease Approval, the Section 8 Technician evaluates the proposed rent for the unit. In so doing, the following factors are considered:

1. The amount of rent being charged for comparable, unassisted units of the same size and unit type in the neighborhood,
2. Rents being charged for other comparable Section 8 assisted units,
3. The amenities in the unit,
4. The quality, location and age of the building,
5. On-site facilities, or housing services in the building,
6. Management and maintenance of the building and the unit; and
7. The amount of rent charged by the owner for similar units in the same building and in other buildings in the same development. The PHA may also consider rents in any other buildings owned by the same owner.

B. Information Used:

1. The PHA collects data periodically from a variety of

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sources including marketplace survey data, rental property listings, and local studies. The data include rental units in St. Paul with various rents, utilities, locations, number of bedrooms, and unit types. The PHA uses this database to show comparable rental units without rental assistance.

2. The PHA also uses data on rents being charged for other comparable Section 8-assisted units.

VII. SECURITY DEPOSITS

- A. Amount of Security Deposit:** An owner may collect a security deposit from the tenant in an amount not to exceed the amount charged by the owner to unassisted tenants. §982.313(a),(b)
- B. Source of Security Deposit:** The household is expected to pay security deposits from their own resources or other private or public sources. The PHA will not pay the security deposit.
- C. Use of Security Deposit:** After the family moves from the Section 8 assisted unit, the owner may (*subject to state law*), use the security deposit, including any interest on the deposit, as reimbursement for any unpaid Family Rent or other amounts which the family owes under the Assisted Lease. The owner will give the family a written list of all items charged against the security deposit and the amount of each item. After deducting the amount used as reimbursement to the owner, the owner shall promptly refund the full amount of the balance to the family. §982.313(c),(d)
- D. Damages or Other Amounts Owed:** The PHA will not reimburse owners for the cost of damages or other unpaid amounts owed by tenants under the lease. The owner must collect damage payments from the tenant. For leases executed before January 1, 1996, the PHA will reimburse owners for the cost of damages or other unpaid amounts by tenants under the lease as stated in the Housing Assistance Payment Contract. §982.313(e)

VIII. PORTABILITY

A. Overview:

1. Portability means that a family can rent a dwelling unit with Section 8 assistance outside the jurisdiction of the housing authority in which they initially received their Voucher. §982.353

SECTION 8 ADMISSION & OCCUPANCY POLICIES

2. Voucher holders who move to Saint Paul under the portability provisions of the Section 8 Program from other jurisdictions will be assisted by the Saint Paul PHA.
3. Section 8 Moderate Rehabilitation assistance is not portable because the assistance is “attached” to the unit (project-based).

B. Moves to Other Jurisdictions:

1. A Voucher holder may receive assistance to lease a unit outside the St. Paul PHA’s jurisdiction, or in any jurisdiction in the United States that is administering a tenant-based program. §982.353
 - a. The PHA will not provide portable assistance if the family has moved out of its assisted unit in violation of the lease.
 - b. If the PHA has absorbed a family porting in from another jurisdiction, the family must reside in the St. Paul PHA’s jurisdiction for one year before using the portability feature to move to another jurisdiction.
 - c. Victim of Domestic Violence. A family may move to another jurisdiction using voucher portability if the family has complied with all other obligations of the Section 8 program and moved out of the assisted dwelling unit in order to protect the health and safety of a family member who is or was the victim of domestic violence, dating violence or stalking and who reasonably believed he or she was imminently threatened by harm from further violence if he or she remained in the assisted dwelling unit. The PHA may require an applicant or participant who is or claims to be a victim of domestic violence to provide a signed certification or other documentation. (See Appendix M, VAWA Policy).
2. If the applicant head or spouse did not reside in the St. Paul PHA’s jurisdiction (the City of Saint Paul) at the time of the initial application, a one-year initial residency in the city of Saint Paul is required. This residency requirement may be waived if both the Saint Paul PHA and the receiving Housing Authority approve.
3. A family moving under the portability provisions must be income eligible in the area where the family initially leases a unit with assistance in the Voucher Program.

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4. Income eligibility is not redetermined for a current participant who is moving to a new jurisdiction with assistance.

C. Portability Procedures:

1. For a family to move using portability, the initial Housing Authority must determine that the family:
 - a. Is eligible to move under the portability procedures; §982.314
§982.355
 - b. Has met all participant obligations under the Voucher Program; §982.551
§982.552
 - c. Is not being denied assistance based on any grounds for termination or denial of assistance; and
 - d. Is income-eligible in the area where the family wants to lease a unit.
 - e. The family must pay the full balance due to the PHA on any repayment agreement before porting out.
2. When a family moves under portability to an area outside the initial Housing Authority jurisdiction, the receiving Housing Authority must administer the assistance for the family, if they have jurisdiction in the area where the unit is located and if they have a tenant-based program. §982.355
3. The initial Housing Authority must advise the family on how to contact and request assistance in the receiving Housing Authority. The initial Housing Authority will promptly notify the receiving Housing Authority to expect the family.
4. The receiving Housing Authority must issue the family a Voucher. The term of assistance of the receiving Housing Authority Voucher may not expire before the expiration date of any initial Housing Authority Voucher.
5. The family must promptly contact the receiving Housing Authority and comply with the receiving housing authority procedures for incoming families using portability.
6. The initial Housing Authority must give the receiving Housing Authority the most recent HUD Form 50058 for the family and related verification information. If the receiving Housing Authority opts to conduct a new re-

SECTION 8 ADMISSION & OCCUPANCY POLICIES

examination, the receiving Housing Authority may not delay issuing the family a Voucher, or otherwise delay approval of a unit, unless the recertification is necessary to determine income eligibility. See Part 1. V.E.7.

7. The receiving Housing Authority must promptly inform the initial Housing Authority whether they will bill the initial Housing Authority for assistance on behalf of the family, or will absorb the family into their own program.
8. The receiving Housing Authority must determine the family unit size for the family moving under portability. The family unit size is determined in accordance with the Subsidy Standards of the receiving housing authority.
9. The family moving under portability must select a unit and submit a Request for Lease Approval to the receiving housing authority during the term of the receiving Housing Authority's Voucher.
10. To provide assistance for families moving under portability, the receiving housing authority must perform all Housing Authority program functions, including unit inspections and re-examination of family income and composition. At any time, either the initial Housing Authority or the receiving Housing Authority may make a determination to deny or terminate assistance to the family in accordance with its specific policies.
11. To cover assistance for a family moving under portability, the receiving Housing Authority may bill the initial Housing Authority for housing assistance payments and administrative fees, rather than absorb them into their program.
12. The initial Housing Authority must promptly reimburse the receiving Housing Authority for the full amount of the housing assistance payments made for the family moving under portability, and 80 percent of the initial Housing Authority's ongoing per unit month administrative fee earned for program administration.
13. When a family, who moved under portability, subsequently moves out of the tenant-based program of a receiving Housing Authority that has not absorbed the family, the Housing Authority in the new jurisdiction to which the family moves becomes the receiving Housing Authority, and the first receiving Housing Authority is no longer required to provide assistance for the family.

PART FIVE:

LEASES AND HOUSING ASSISTANCE PAYMENTS CONTRACTS

I. OVERVIEW

Refer to:
24 CFR

Before the PHA can pay Section 8 Rent Assistance to an owner on behalf of an eligible tenant family, the PHA must approve the lease between the owner and the tenant, and the PHA and the owner must sign a Housing Assistance Payments Contract.

II. LEASES

A. PHA Approval of Lease and Housing Assistance Payment Contract: §982.305
Before the PHA can approve the lease and sign the Housing Assistance Payments Contract, the following requirements must be met:

1. The PHA has approved leasing of the unit in accordance with program requirements; §982.305
2. The PHA has inspected the unit and the unit meets the Housing Quality Standards; §982.305
3. The lease is approvable and includes the lease addendum; §982.305
4. The rent to owner is reasonable; and §982.305
5. The owner and the tenant have executed a written lease.

B. Lease Provisions and HUD Lease Addendum:

1. The lease between the tenant and the owner, including any new lease or lease revision, must be approved by the PHA. §982.308
2. The lease must specify all of the following:
 - a. The names of the owner and the tenant;
 - b. The address of the unit rented;
 - c. The initial term of the lease and any provision for renewal;
 - d. The amount of monthly rent to owner; and
 - e. A specification of what utilities and appliances are provided by the owner or tenant.

3. The lease must include word-for-word all the provisions of the lease addendum required by HUD. This can be accomplished by adding the HUD lease addendum provisions to the lease used by the owner. The lease addendum outlines the lease provisions which are required or prohibited by HUD.

C. Duration of Leases:

1. **Initial Lease:** Except as provided below, the initial term of the lease must be for at least one year. §982.309(a)
 - a. The PHA may approve a shorter initial lease term if a shorter term would improve housing opportunities for the tenant and is the prevailing local market practice.
2. **Renewals:** The lease between a Section 8 Program participant and an owner is automatically renewed according to the terms of the lease unless it is terminated by any of the actions listed in C.3. §982.309(b)
3. **Terminations:** The lease may be terminated by any of the following actions:
 - a. The owner terminates the lease, as permitted by HUD regulations (Part 6. XII.C. below); or §982.310
 - b. The tenant terminates the lease in accordance with the terms of the lease; or §982.309
 - c. The owner and tenant agree to terminate the lease; or
 - d. The PHA terminates the Housing Assistance Payments Contract with the owner; or
 - e. The PHA terminates the family's Section 8 assistance.

D. New Lease and New Housing Assistance Payment Contract:

1. Any new lease must be approved in advance by the PHA. The PHA and the owner must enter into a new Housing Assistance Payment Contract for the tenancy under a new lease. Any of the following changes require a new lease and a new contract: §982.309
 - a. Changes in lease requirements regarding tenant or owner responsibilities for utilities and appliances; or,

- b. Changes governing the term of the lease; or
 - c. If the family moves to a new unit even if the unit is in the same building.
2. The owner may offer the family a new lease for a term beginning at any time after the initial term. The owner must give the tenant written notice of the offer, with a copy to the PHA. The offer must specify a reasonable time limit for acceptance by the family.

E. Changes in Lease or Rent:

1. Any changes to the lease or rent must be agreed to by the owner and tenant. A copy of such changes must be in writing and given to the PHA.
2. The owner must notify the PHA of any rent changes in writing and at least 60 days before any such changes go into effect. Any rent changes are subject to rent reasonableness.

III. <u>HOUSING ASSISTANCE PAYMENTS CONTRACTS</u>	§982.451
A. The PHA will use its best efforts to execute the Housing Assistance Payment Contract with the owner before the beginning of the lease term. In all cases the Housing Assistance Payment must be executed no later than 60 calendar days from the beginning of the lease term.	§982.305(c)
B. The term of the Housing Assistance Payment Contract is the same as the term of the lease.	§982.451
C. The Housing Assistance Payment Contract terminates if the lease terminates.	
D. The Housing Assistance Payment contract between the PHA and the owner terminates automatically 180 calendar days after the last housing assistance payment to the owner.	§982.455

PART SIX: CONTINUED PARTICIPATION

I. OVERVIEW

Refer to:
24 CFR

A. Compliance with Lease and Program Requirements: To remain eligible for Section 8 Rent Assistance, the family must comply with the terms of their Voucher, their lease and the other program requirements listed in these policies.

B. Annual Re-Examinations:

§982.551
§5.617(a)

1. At least once a year, the PHA must re-examine a family's eligibility for continued participation in the program. The PHA will review household income, unit rent, family composition, the amount of the utility allowance, the appropriateness of the unit size occupied by the family, and the reasonableness of the rent. Except as stated below, all income and assets will be verified according to the policies listed under Section V. of Part One of this document. The unit is also inspected annually for compliance with Section 8 Housing Quality Standards unless the PHA determines that it is eligible for biennial inspections under Section X.B. below.

PIH Notice 2013-03

2. The PHA may conduct a streamlined reexamination of income for families when at least 90 percent of the family's income consists of fixed income. In such cases the PHA must obtain third-party verification of all income amounts and assets at least once every three years. See IV.D. below.

24 CFR §5.657
FedReg
12/12/2017

P.L. 114-87

C. Interim Rent Re-determinations: If there are changes in a family's circumstances between the dates for an annual re-examination, the amount of Family Rent may also change.

D. On-Going Information and Assistance to Families: The PHA will provide on-going information and assistance to families on matters within the Agency's scope of responsibility. PHA staff will refer families to the appropriate social services agency when the need for information or supportive services is beyond the PHA's mission as a housing agency.

II. REQUIREMENTS FOR CONTINUED ELIGIBILITY

- A. Obligations of the Family:** When a family's unit is approved and the Housing Assistance Payment Contract is executed, the family must follow the terms specified in the lease and the rules listed below in order to continue participating in the Section 8 Voucher Program. §982.551
1. The Family must:
 - a. Supply any information that the PHA or HUD determines to be necessary, including evidence of citizenship or eligible immigration status, and information for use in a regularly scheduled reexamination or interim reexamination of family income and composition.
 - b. Disclose and verify Social Security numbers and sign and submit consent forms for obtaining information.
 - c. Supply any information requested by the PHA to verify that the family is living in the unit or information related to family members' absence from the unit.
 - d. Promptly notify the PHA in writing when the family is away from the unit for an extended period of time in accordance with PHA policies.
 - e. Allow the PHA to inspect the unit at reasonable times and after reasonable notice.
 - f. Notify the PHA and the owner in writing before moving out of the unit or terminating the lease. This must be done in accordance with the terms and conditions of the lease.
 - g. Use the assisted unit for residence by the family. The unit must be the family's only residence.
 - h. Notify the PHA in writing within 10 working days of a birth or adoption, or when awarded custody of a child.
 - i. Request PHA written approval to add any other family member or other person as an occupant of the unit. The composition of the assisted family living in the unit must be approved by the PHA. No other person may reside in the unit.

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- j. Promptly notify the PHA in writing if any family member no longer lives in the unit.
 - k. Give the PHA a copy of any owner eviction notice.
 - l. Pay utility bills and supply appliances that the owner is not required to supply under the lease.
 - m. Disclose to the PHA, within 10 working days of receiving it, any information received from HUD on income, earnings, wages or unemployment compensation discrepancies pursuant to HUD's income matching verification procedures.
2. Any information the family supplies must be true and complete.
3. The family (*including each family member*) must not:
- a. Own or have any interest in the unit (other than in a cooperative, or the owner of a manufactured home leasing a manufactured home space).
 - b. Commit any serious or repeated violation of the lease.
 - c. Commit fraud, bribery or any other corrupt or criminal act in connection with the program.
 - d. Engage in drug-related criminal activity or violent criminal activity, or other criminal activity that threatens the health, safety, or right to peaceful enjoyment of other residents and persons residing in the immediate vicinity of the premises.
 - e. Sublease or let the unit or assign the lease or transfer the unit.
 - f. Receive Section 8 tenant-based program housing assistance while receiving another housing subsidy, for the same unit or a different unit under any other federal, state or local housing assistance program.
 - g. Damage the unit or premises (*other than damage from ordinary wear and tear*) or permit any guest to damage the unit or premises.
 - h. Receive Section 8 tenant-based program housing assistance while residing in a unit owned by a parent,

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child, grandparent, grandchild, sister or brother of any member of the family, unless the PHA has determined (and has notified the owner and the family of such determination) that approving rental of the unit, notwithstanding such relationship, would provide reasonable accommodation for a family member who is a person with disabilities.

- i. Engage in illegal use of a controlled substance; or abuse of alcohol that threatens the health and safety or right to peaceful enjoyment of the premises by other residents.

B. Families Receiving Zero Rental Assistance: Participants will remain eligible for the Section 8 Program for 180 days, or six months, at zero rental assistance if their income increases to a point that their Total Tenant Payment (TTP) is equal to or exceeds the gross rent for the unit. The Housing Assistance Payment Contract between the PHA and the owner terminates automatically 180 calendar days after the last housing assistance payment to the owner.

§982.312

§982.455

C. Persons Temporarily Absent from Unit: Participant families who must be out of their unit for an extended period of time due to vacation, hospitalization or imprisonment, will remain eligible for continued participation, subject to PHA approval, provided that they:

§982.312

1. Remain in compliance with the terms of the Section 8 Program and their Assisted Lease;
2. Supply any information or certification requested by the PHA to verify that the family is residing in the unit, or relating to family absence from the unit;
3. Remain absent from the unit for a period of no more than 180 consecutive calendar days in any circumstance, or for any reason.

Housing Assistance Payments terminate if the family is absent for longer than the maximum period permitted. The Housing Assistance Payment Contract and lease also terminate.

D. Death of a Section 8 Participant: When a Section 8 participant dies, and there are no remaining members of the tenant family, the HAP subsidy ends with that month. The

SECTION 8 ADMISSION & OCCUPANCY POLICIES

PHA is not permitted to pay a subsidy for the any portion of the following month.

- E. Family Separation:** Participant families who separate while being assisted under the tenant-based programs will be assessed on a case-by-case basis to determine which family members if any, will remain assisted under the program. Except in cases involving domestic abuse (see #5 below), the PHA policy will be that:

1. Only adult family members who were listed on the voucher application at the time of admission to the program are eligible to receive the voucher when there is a family separation, except in special circumstances. §982.315
2. The Head of Household or other adult household member who has custody of any minor children listed on the voucher application at the time of admission may retain the use of the tenant-based Voucher upon family separation.
3. Remaining adult members of the household may not be eligible to retain the voucher assistance if the Head of Household chooses to move out of the assisted unit or ends his or her voucher participation, or if the PHA terminates the Head of Household's eligibility. The PHA may allow the remaining adult household member(s) to retain the voucher assistance based on a showing of special circumstances.
4. If the family assisted by the voucher separates as the result of a divorce or separation under a settlement or judicial decree, the PHA will follow any court determination of which family members keep the Voucher assistance.
5. In cases involving domestic abuse, the PHA may allow the victim(s) to keep their Voucher assistance and require the perpetrator(s) of the domestic violence to be removed from the lease, even if the perpetrator is the Head of Household.

- F. Family Moves With Continued Assistance:** A participant family may move to a new unit with continued tenant-based assistance if:

1. The Assisted Lease for the old unit has terminated. This includes a termination because:

SECTION 8 ADMISSION & OCCUPANCY POLICIES

- a. The PHA has terminated the Housing Assistance Payment Contract for the owner's breach of the terms of the contract, or,
 - b. The lease has terminated by mutual agreement of the owner and the tenant.
2. The owner has given the tenant a Notice to Vacate, or has commenced an action to evict the tenant, or has obtained a court judgment or other process allowing the owner to evict the tenant.
3. The tenant has given Notice of Lease Termination.
 - a. The family may terminate the lease in accordance with the terms of the lease. §982.314
 - b. If the family terminates the lease on notice to the owner, the family must give the PHA a copy of the Notice of Termination at the same time. §982.309
4. Victim of Domestic Violence. A family may move to another unit with continued tenant-based assistance if the family has complied with all other obligations of the Section 8 program but may have moved out of the assisted dwelling unit without giving proper notice in order to protect the health and safety of a family member who is or was the victim of domestic violence, dating violence or stalking and who reasonably believed he or she was imminently threatened by harm from further violence if he or she remained in the assisted dwelling unit. The PHA may require an applicant or participant who is or claims to be a victim of domestic violence to provide a signed certification or other documentation. (See Appendix M, VAWA Policy).

III. TERMINATING ASSISTANCE TO ILLEGAL DRUG USERS AND ALCOHOL ABUSERS

The PHA may terminate Section 8 Assistance to any participant if it determines that the participant or any member of the participant's household is illegally using a controlled substance or if it determines that the abuse of alcohol by the participant or any member of the participant's household interferes with the health, safety, or right to peaceful enjoyment of the premises by other residents. See Part One, Section II. §982.552

IV. ANNUAL RE-EXAMINATIONS

- A. Timing of Annual Re-Examinations:** Re-examinations are conducted at least annually, based on the anniversary date of the family’s initial move-in date into that unit. §5.617
§982.516
- B. Requirements for Annual Re-Examinations:**
1. **Application for Tenant Eligibility and Re-Certification:** The family must complete an Application for Continued Participation.
 2. **Use of Confidential Information/Data Practices:** Information that is obtained directly from participants, or from those persons authorized by participants, will be used or disclosed only for purposes relating directly to the administration of the Section 8 Program. All information that is “private data on individuals” under the Minnesota Government Data Practices Act (Minn. Stat. Sec. 13.01 and following) will be handled in compliance with that law. Information obtained from HUD’s online UIV/EIV systems will be used, stored and disposed of in compliance with HUD requirements.
 3. The PHA may conduct a streamlined income determination for families when at least 90 percent of the family’s income consists of fixed income. In such cases, the PHA must obtain third-party verification of all income amounts and assets at least once every three years. 24 CFR §5.657
FedReg
12/12/2017
- C. Streamlined Annual Reexaminations** for families on fixed incomes.
1. The PHA may conduct a streamlined reexamination of income for families when at least 90 percent of the family’s income consists of income from fixed income sources. The PHA will recalculate family incomes by applying any published cost of living adjustments to the previously verified income amount. This policy is effective April 1, 2018.
 2. Definition of “fixed income. For purposes of this section, the term “fixed income means periodic payments at reasonably predictable levels from one or more of the following sources:

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- a. Social Security, Supplemental Security Income (SSI) and Supplemental Security Disability Insurance (SSDI);
 - b. Federal, State, local, and private pension plans; and
 - c. Annuities or other retirement benefit programs, insurance policies, disability or death benefits, or other similar types of periodic receipts,
 - d. Any other source of income subject to adjustment by a verifiable COLA or current rate of interest.
3. Method of streamlined income determination. A PHA using the streamlined income determination must adjust a family's income according to the percentage of a family's unadjusted income that is from fixed income.
 - a. When 90 percent or more of a family's unadjusted income consists of fixed income, the PHA using a streamlined income determination must apply a COLA or COLAs to the family's sources of fixed income, provided that the family certifies both that 90 percent or more of their unadjusted income is fixed income and that their sources of fixed income have not changed from the previous year.
 - b. When more than 90 percent of a family's unadjusted income consists of fixed income, the PHA will assume there is no change in the amounts of non-fixed income, unless the family reports a change in that income.
 - c. When less than 90 percent of a family's unadjusted income consists of fixed income, the PHA will apply a COLA to each of the family's sources of fixed income individually. The PHA must determine all other income pursuant to Part 1 Section V.
4. COLA rate applied by PHAs. PHAs using streamlined income determinations must adjust a family's fixed income using a COLA or current interest rate that applies to each specific source of fixed income and is available from a public source or through tenant provided, third-party-generated documentation. If no public verification or tenant-provided documentation is available, then the PHA must obtain third-party verification (from the tenant, if applicable) of the income amounts in order to calculate the change in income for the source.

5. Triennial Verification

For any income determined pursuant to a streamlined income determination, a PHA must obtain third-party verification of all income amounts every 3 years.

V. INTERIM RE-EXAMINATIONS

§982.516

§982.551

The PHA may conduct re-examinations more frequently than once a year due to special family circumstances or changes in program regulations. The family's eligibility for continued occupancy will only be determined during a regular or interim re-examination.

A. Unusual Income Situations: The PHA will initiate more frequent re-examinations under the following circumstances:

1. Families with **zero income** must have their incomes re-examined at least every 90 days.
2. Families with **income that cannot be projected with reasonable accuracy** due to its temporary or sporadic nature will have more frequent re-examinations:
 - a. They will have their incomes re-examined at intervals of not less than 30 days (monthly) and no more than 90 days (quarterly).
 - b. The PHA will set a schedule for re-examinations that is appropriate to the family's circumstances.
3. If a family has a pattern of seasonal or irregular income that results in reasonably consistent annual income from year to year, as shown by data in HUD's Enterprise Income Verification (EIV) online data system or similar reliable data source(s), the PHA will calculate the family's rent based on that historical data.
4. A family with a pattern of seasonal income, that does not result in reasonably consistent annual income from year to year, may have their rent based on a year-around average, using records of recent years' income patterns.

B. Other Interim Re-Examinations: Between regularly scheduled re-examinations, if there are changes in a family's

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income, household composition, or eligible deductions, an interim re-examination may be conducted.

1. **Family Requests for Re-Examinations:** Families have the choice of requesting an interim re-examination under the following circumstances:
 - a. They receive a decrease in income which may result in a rent decrease; or
 - b. They have an increase in the following eligible allowances or deductions:
 - (1) An increase in expenses for the care of a child or member with a handicap, or
 - (2) An increase in permissible deductions and/or expenses due to a change in HUD regulations, or
 - (3) For elderly families only, an increase in medical expenses; or
 - (4) An increase in the number of dependents.

2. **Circumstances Requiring an Interim Re-Examination:** An Interim Re-examination must be performed when any one of the circumstances listed below occurs. In these circumstances, all changes in household status and income will be considered in determining Total Tenant Payment:

- a. **Household Changes; Guests/Visitors:** New persons may not be added to the household without the PHA's prior approval other than the addition of a child by birth, adoption or award of legal custody. The PHA will not approve the addition of new household member(s) if doing so would cause the unit to be overcrowded. The household voucher size will only be increased if the addition of household member(s) is of a long-term duration (12 months or more). §982.551(h)(2)

A family must get written approval from the PHA if a guest or visitor will be staying in the unit for more than 14 days over a twelve-month period. If the family does not receive the PHA's written approval, the PHA may determine that the person should be considered a member of the household for purposes of income and rent determination; and the PHA may also

determine that the presence of the unauthorized person is grounds for termination of the voucher assistance

- b. **Increasing the Voucher Size:** When the addition of household members by birth, adoption or award of legal custody would require a change to the voucher size, the voucher size will be increased at the next change of unit or regularly scheduled re-examination, whichever comes first, unless the addition to the household causes the household to be overcrowded. If the household is overcrowded as a result of the added members, the PHA may approve a larger voucher and if so, will require the family to move to a larger unit within a reasonable period of time.

If the addition of adults, with or without their children, would cause the unit to be overcrowded, the PHA will not approve the addition. If it does approve the addition, the PHA will not increase the voucher size until the annual reexamination that occurs at least 12 months after the PHA approved the addition.

- c. **Reducing the Voucher Size:** When household members move out of the assisted unit so the family is no longer eligible for its current voucher size, the PHA will reduce voucher size no later than the next regularly scheduled re-examination.
- d. **Required Reporting:** Tenants must report all changes in household composition within ten (10) days of the occurrence involving:
 - 1. Any addition or loss of an adult member (see also Section II.A.h.-i. above); or
 - 2. The addition or loss of a minor to the household. (see below).
 - 3. The addition of a newborn to the household does not require an interim re-examination unless the addition of the newborn would be accompanied by an increase in monthly income of \$400 or more.
- e. **Adding Minors to a Household:** The PHA may approve a head of household's request to add a minor to the household if the head of household or another

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adult household member proves that he or she has legal custody of the minor, by providing one of the following documents:

1. Birth certificate showing that the adult household member is the biological parent of the minor; or
2. Legal proof of adoption; or
3. Court order awarding custody; or
4. Written Delegation of Parental Authority, under Minnesota Statutes Section 524.5.211, executed within the last 12 months (see below); or
5. Legal proof of foster care and intended placement in the household for at least 184 days, confirmed by the placing entity.

NOTE: A Delegation of Parental Authority, under the statute, is a temporary delegation of authority from a parent of a child to another adult, valid for up to one year. It should be reviewed annually and may be renewed.

- f. **Increased Income:** Families must report an increase in monthly gross household income totaling \$1,000 or more. The \$1,000 increase in monthly income is cumulative. §982.516

g. **Exceptions to Increased Income Threshold**

- (1) A household that has been certified as having no income (a zero-income family) must report all income increases, and the rent will be adjusted accordingly.
- (2) If the household's income increases due to another person joining the family, the rent will be adjusted.

h. PHA Error

- (1) When an error is made by the PHA at admission or re-examination, the participant is encouraged to report the error to the PHA as soon as they become aware of it so an Interim Re-Examination can be conducted.
- (2) No retroactive rent increase will be made against the family when the PHA has made an error

C. Timing of Changes for All Participants: Upon completion of an interim re-examination, the PHA will promptly notify the family and owner of the new Family Rent, Housing Assistance Payment and Total Rent to Owner.

1. **Rent Increase:** If the Family Rent increases as a result of an **annual** income re-examination, the PHA must provide 30 days written notice to the participant of the new rent amount.
2. **Interim Changes:** The participant is required to report, within 10 days of the date the change occurs, any changes in income or family composition as described in Section V.B.2. of this Part that occur between regularly scheduled re-examinations.

Increases in rent resulting from **interim** redeterminations will be effective the first of the month that begins at least 30 days after the month in which the change in status actually occurred.

Decreases in rent resulting from **interim** redeterminations will be effective the first of the month that begins at least 30 days after the month in which the change in status was reported.

3. **Failure to Report Income Increases or Change in Household Size:** If the family fails to report an increase in total family income of \$1,000 a month or more or fail to report an increase or decrease in the household size, the PHA may increase the required Family Rent retroactively,

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or terminate the family from the Section 8 Program for failure to comply with program regulations. The rent increase may be imposed retroactive to the first day of the second month after the increase in income occurred.

4. **Notification:** The PHA will notify the family in writing of any change in the Family Rent and state the reasons. The PHA will give the family an opportunity to request an informal hearing on the matter.

VI. RENT CHANGES

At least three months prior to the annual re-exam date, the owner is notified of the family's annual re-exam and pending HQS inspection. Any changes to the lease, including rent increases, will be processed according to the terms of the lease. The owner must notify the tenant in writing of any changes with a copy to the PHA.

- A. Rent Determinations:** Any increase requested by the landlord must meet the rent reasonableness test and must be agreed to by the family and the landlord. If the family does not agree to the rent increase proposed by the landlord, they may give proper notice to vacate the unit. Family Rents may change if the Payment Standard changes. The Payment Standard for the family must be changed at the time of re-examination if one of the following occurs:
- §887.353(b)(2)
§982.505

1. The PHA's Payment Standard applicable to the family has increased;
2. New Subsidy Standards have been adopted by the PHA that change the unit size for which the family qualifies;
3. The family's size or composition has changed, requiring a different unit size;
4. The family moves, and the new unit has a different Payment Standard.

VII. INELIGIBILITY DETERMINATIONS

Participants will be ineligible for continued participation if any of the following occurs:

- A.** The family fails to comply with any of the obligations under this program; (*See Part One, Section II.B. for additional grounds for termination of assistance*).
- §982.552(c)(1)(i)

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- B.** The family fails to comply with the terms of a Payment Agreement for monies owed to the PHA or to another housing authority. See also Part 6, XIV. Debts Owed to the PHA; Payment Agreements. §982.552(c)(1)vii
§982.455
- C.** The family receives no rent assistance for six months (that is, if the family's income has remained at a level where their TTP is equal to or exceeds the gross rent for the unit). The Housing Assistance Payment Contract between the PHA and the owner terminates automatically 180 days after the last Housing Assistance Payment to the owner. §982.312
- D.** If all members of the participant family are out of the unit for a period of more than 180 consecutive days for any reason, Housing Assistance terminates.

VIII. NOTICE TO INELIGIBLE FAMILIES

- A. PHA Notice:** The PHA will give the participant prompt written notice of a decision that the family has been determined to be ineligible for continued program participation. The written notice will contain a brief statement of the reasons for the decision. §982.552
§982.555
- B. Informal Hearing:** The notice will state that if the participant does not agree with the determination, the participant may request an informal hearing to present objections to the determination. The request for an informal hearing must be in writing, and it must be received by the PHA within 10 days of the date of the PHA notification letter.
1. The PHA will not provide a participant family an opportunity for an informal hearing in the following instances:
 - a. Discretionary administrative determinations by the PHA.
 - b. General policy issues or class grievances.
 - c. Establishment of the PHA schedule of utility allowances for families in the program.
 - d. A PHA determination to approve an extension or suspension of a certificate or voucher term.

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- e. A PHA determination not to approve a unit or lease.
- f. A PHA determination that an assisted unit is not in compliance with HQS.
- g. A PHA determination that the unit is not in accordance with HQS because of the family size.
- h. A determination by the PHA to exercise or not exercise any right or remedy against the owner under a HAP contract.

(See Appendix G.)

IX. UNIT SIZE DETERMINATION

During annual and interim re-examinations, the family composition will be evaluated to determine the minimum and maximum unit size appropriate to their needs, following the PHA's Subsidy Standards.

The family may lease an otherwise acceptable unit with fewer bedrooms than the family unit size. However, the unit must meet the applicable HQS space requirements. The family may also lease an otherwise acceptable unit with more bedrooms than the family size requires. §982.402(d)(2)

A. Units Too Small: During the annual or interim re-examination, if the family size requires a larger unit to comply with the PHA's Subsidy Standards, they will be issued a new Voucher which would allow a move to a unit of the appropriate size. The PHA will require the family to move to a larger unit within a reasonable period of time. If an acceptable unit is available for rent by the family, the PHA must terminate the Housing Assistance Payment Contract for the first unit in accordance with its terms. §982.403

B. Units Too Large: Decreases or changes in family composition can reduce the size of the unit for which a family qualifies.

1. If the Voucher size is too large for the family size, the PHA will issue the family a new Voucher that is appropriate for the family. The PHA will reduce voucher size no later than the next regularly scheduled re-examination.

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2. Families who are currently renting a unit with a gross rent that is higher than the Payment Standard for the smaller unit size they now qualify for will not be required to move. However, the amount of subsidy provided on their behalf will be reduced to reflect the lower Payment Standard for which they now qualify. §982.402(c)(2)
3. The Payment Standard for the family must be the lower of:
 - a. The Payment Standard for the family unit size; or;
 - b. The Payment Standard for the unit rented by the family.

X. UNIT INSPECTIONS

§982.405

Housing Quality Standards (HQS) will be used to determine the acceptability of units rented in conjunction with the Section 8 Programs. HQS inspection forms are completed for each unit inspection and maintained in the participant file. If a unit fails to meet HQS, the owner and tenant family are notified in writing of the deficiencies that need to be corrected in order to permit Section 8 Rent Assistance for that unit. Unit inspections are conducted by Housing Inspectors at various points in tenancy:

A. Move-In Inspection: Is conducted to determine the initial condition of the unit prior to the tenant's move-in and/or start of Section 8 Rent Assistance. (See Part 4.)

B. Annual or Biennial Inspection:

79 Fed Reg 35940
6/25/2014

1. An annual inspection is conducted 60-90 days prior to the participant's annual re-examination date. In the case of a failed annual inspection, repairs must be made prior to the participant's annual re-examination date. For emergency repairs, the repairs must be completed within the time frame indicated in the emergency repair notification letter. 80 Fed Reg 423
1/6/2015
2. Biennial Inspections: The PHA may approve biennial inspections for a participating unit under following circumstances:
 - a. The unit passed its previous annual inspection with no physical reinspections, and

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- b. The PHA has not received requests from the tenant or other parties during the year to re-inspect the unit, based on allegations of HQS deficiencies.
- C. **Special Request Inspection:** Is conducted at the request of the tenant, owner or neighborhood to assess unit conditions that may be Housing Quality Standards deficiencies.
- D. **Move-Out Inspection:** Is conducted following the tenant move-out to assess unit condition that may result in an owner assessment of damages beyond normal wear and tear. Move-out inspections will only be conducted if the owner had executed a Housing Assistance Payment Contract for the tenant with the PHA prior to the effective date of the HUD Conforming Rule of 7/3/95, in which case the owner may be entitled to file a claim with the PHA for damages, unpaid rent or vacancy loss.
- E. **Quality Control Inspection:** Is conducted on a percentage of Section 8 units of all types to ensure consistency in HQS inspections, and that rental units continue to meet the program standards.

XI. HOUSING ASSISTANCE PAYMENTS TO OWNERS

- A. **Rent Assistance Payments:** Housing Assistance Payments to owners on behalf of Section 8 participants are made by check approximately on the first working day of the month and the fifteenth of each month. If housing assistance payments are not paid promptly when due after the first two calendar months of the HAP contract term (by the 10th of the month), the PHA shall pay the owner late rent penalties in accordance with state and local practices and the terms of the lease. The owner must request, in writing, the payment of such late fees. The PHA shall not be obligated to these penalties if the payments are late due to circumstances beyond the control of the PHA. §982.311
- B. **PHA Rights and Remedies:** The PHA rights and remedies against the owner under the Housing Assistance Payment Contract include recovery of overpayments, abatement or other reduction of housing assistance payments, termination of housing assistance payments, and termination of the Housing Assistance Payment Contract. The PHA will attempt to recover any overpayments to an owner. If an overpayment §982.453

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to an owner exceeds \$1000 and occurs because of owner fraud, and if this amount is not repaid by the owner, the PHA will attempt to obtain a judgment in the appropriate court and will file a claim through the Minnesota Revenue Recapture Program.

C. Payments Under the Housing Assistance Payment

Contract: Housing Assistance Payments are paid to the owner in accordance with the terms of the Housing Assistance Payment Contract. Housing Assistance Payments may only be paid to the owner during the lease term and while the family is residing in the unit.

1. Housing Assistance Payments terminate when the lease is terminated by the owner in accordance with the lease. However, if the owner has commenced the process to evict the tenant and the family continues to reside in the unit, the PHA must continue to make Housing Assistance Payments to the owner in accordance with the Housing Assistance Payment Contract until the owner has obtained a court judgment or other process allowing the owner to evict the tenant. The PHA may continue such payments until the family moves from, or is evicted from the unit.
2. If the family moves out of the unit, the PHA may not make any Housing Assistance Payment to the owner for any month after the month when the family moves out. The owner may keep the Housing Assistance Payment for the month when the family moves out of the unit.
3. If a participant family moves from an assisted unit with continued assistance, the term of the assisted lease for the new unit may begin during the month the family moves out of the first assisted unit. Overlap of the last Housing Assistance Payment in the old unit and the first Assistance Payment for the new unit is not considered to constitute a duplicative Housing Subsidy and, therefore, may occur. §982.311

XII. OWNER TERMINATION OF TENANCY

- A. During the term of the lease, the owner may not terminate the tenancy except on the following grounds:
 1. Serious violation (including but not limited to: failure to pay rent or other amounts due under the lease) or repeated violation of the terms and conditions of the lease;

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2. Violation of federal, State, or local law that imposes obligations on the tenant in connection with the occupancy or use of the premises; or
3. Other good cause. (See #5 below; acts of domestic violence are not good cause for terminating the tenancy of the victim.)
4. Nonpayment by PHA: Not grounds for termination of tenancy.
 - a. The family is not responsible for payment of the portion of the rent to owner covered by the housing assistance payment under the HAP contract between the owner and the PHA.
 - b. The PHA's failure to pay the housing assistance payment to the owner is not a violation of the lease between the tenant and the owner. During the term of the lease the owner may not terminate the tenancy of the family for nonpayment of the PHA housing assistance payment.
5. **Criminal activity:** Any of the following types of criminal activity by the tenant, any member of the household, a guest or another person under the tenant's control shall be cause for termination of tenancy: §982.310
 - a. Any criminal activity that threatens the health, safety or right to peaceful enjoyment of the premises by other residents;
 - b. Any criminal activity that threatens the health, safety or right to peaceful enjoyment of their residences by persons residing in the immediate vicinity of the premises; or
 - c. Any drug-related criminal activity on or near the premises.
 - d. Criminal activity directly relating to domestic violence, dating violence or stalking shall not be considered cause for termination of assistance or tenancy if the tenant or a family member is the victim of the domestic violence, dating violence or stalking. (See Appendix M, VAWA Policy)

- e. An owner or manager may bifurcate a lease in order to evict, remove or terminate assistance to any individual who is a tenant and who engages in criminal acts of physical violence against family members or others, without evicting or terminating assistance to the victim who is also a tenant or lawful occupant
- 6. **Other good cause** for termination of tenancy by the owner may include, but is not limited to, any of the following examples:
 - a. Failure by the family to accept the offer of a new lease or revision;
 - b. A family history of disturbance of neighbors or destruction of property, or of living or housekeeping habits resulting in damage to the unit or premises;
 - c. The owner's desire to use the unit for personal or family use, or for a purpose other than as a residential rental unit; or
 - d. A business or economic reason for termination of the tenancy (such as sale of the property, renovation of the unit, or desire to lease the unit at a higher rental).
- 7. During the initial lease term, the owner may not terminate the tenancy for "other good cause", unless the owner is terminating the tenancy because of something the family did or failed to do. For example, during this period, the owner may not terminate the tenancy for "other good cause" based on any of the following grounds: failure by the family to accept the offer of a new lease or revision; the owner's desire to use the unit for personal or family use, or for a purpose other than as a residential rental unit; or a business or economic reason for termination of the tenancy (See #6.d, of this section).

B. Owner Notice: The owner must give the tenant a written notice that specifies the grounds for termination of tenancy during the term of the lease. The tenancy does not terminate before the owner has given this notice, and the notice must be given at or before commencement of the eviction action.

§982.310(e)

- 1. The notice of grounds must be given at or before the commencement of the eviction action. The notice of

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grounds may be included in, or may be combined with, any owner eviction notice to the tenant.

2. The owner eviction notice means a notice to vacate, or a complaint or other initial pleading used under state or local law to commence an eviction action. The owner must give the PHA a copy of any owner eviction notice to the tenant.
3. Eviction by court action: The owner may only evict the tenant from the unit by instituting a court action.

C. End of Lease Term, Termination of Tenancy: At the end of the initial term and at the end of any successive definite term, an owner may terminate the tenancy without cause. A proper written notice must be provided to the tenant in accordance with the notice period specified in the lease agreement.

D. The PHA may abate or reduce Housing Assistance payments to the owner or terminate the Housing Assistance Payment Contract if the unit fails to meet the Housing Quality Standards, unless the owner corrects the deficiencies within the period of time specified by the PHA. However, the owner is not responsible for a breach of the HQS that is not caused by the owner and for which the family is responsible. §982.404

1. Abatement of Housing Assistance Payments will occur if the unit fails to meet Housing Quality Standards at the time of the tenant's unit anniversary date. The family would then be responsible for the tenant portion of the rent for the duration of the abatement.

Abatement of Housing Assistance Payments will occur if the unit fails to meet Housing Quality Standards during the term of the contract. The family would then be responsible for the tenant portion of the rent for the duration of the abatement.

If the unit continues not to meet Housing Quality Standards and the abatement continues for a period of two months, the PHA will terminate the contract with the owner. The PHA will then issue the family a new Voucher and the family must find an acceptable unit as soon as possible, which could include the current unit.

XIII. COST-SAVING MEASURES

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- A.** The PHA must take action to reduce the number of vouchers under lease (utilization) or to reduce subsidy spending when either utilization or spending is likely to exceed authorized limits. The PHA will take one or more of the following measures to reduce utilization or subsidy spending:

1. Stop issuing new vouchers to families on the waiting list; §982.505(c)(3)
2. Cancel outstanding vouchers held by applicants who are searching for housing but have not yet submitted a Request for Tenancy Approval; when the PHA is able to issue new vouchers again, these families will receive a voucher and the full 60-day shopping time; §982.454
PIH 2011-32
3. Stop issuing vouchers to families moving out of units assisted with Project-Based Vouchers (PBV). When the PHA is able to issue new vouchers again, these families will receive a voucher;
4. Stop approving new families moving into vacant units in projects with Project-Based Vouchers (PBV), until the PHA is able to issue new vouchers again;
5. Stop approving moves to higher-cost units, unless the move was required by the PHA (for example, to comply with occupancy standards);
6. Stop approving moves (“port-outs”) to higher-cost jurisdictions, if the PHA has insufficient funds for continued assistance;
7. Reduce Payment Standards for all or some unit sizes. For tenant-based vouchers, a lower payment standard applies immediately to all new admissions, all movers, and families remaining in their units with a new HAP contract (e.g., when the owner offers or requires a new lease). For all other voucher participants, decreased payment standard amounts are not applied until the second regular reexamination after the payment standard is lowered. The PHA may request a HUD regulatory waiver to implement the reduced payment standard sooner;
8. Cancel vouchers currently under lease and cancel the associated Housing Assistance Payments (HAP) contracts. If the PHA has to reduce the number of vouchers under lease, it will cancel the vouchers for which the lowest subsidy

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(Housing Assistance Payment) is being paid, to limit the negative impact on participants. If the PHA has to reduce subsidy spending, it will consider other methods, again with the goal of minimizing the negative impact on participants and avoiding disparate impact on any protected class;

9. Take other cost-saving measures that are consistent with the above actions, if required by particular future circumstances in the future.

XIV. DEBTS OWED TO THE PHA; PAYMENT AGREEMENTS

- A. The following policies apply to any monies owed to the PHA by current Section 8 Voucher participant families (including individuals).
- B. When a family owes money to the PHA, the PHA may either require the family to pay that amount in full, or require the family to enter into a Payment Agreement as a condition of continued participation.
 1. To be eligible to enter into a Payment Agreement, the family must first demonstrate to the satisfaction of the PHA that they cannot pay the debt in full.
 2. Payment Agreements require a minimum payment of \$25 a month on each claim for monies owed until the balance owed is paid in full.
 3. The Payment Agreement shall require payment in full of the balance owing within twelve months, absent extraordinary circumstances.
- C. Consequences of Default on Payment Agreement
 1. If the family does not meet the agreed-upon terms of a Payment Agreement, the family will be subject to termination of the assistance. See also Part 6, VII.B. Ineligibility Determinations.
 2. The PHA may file a claim for repayment under the Minnesota Revenue Recapture Act.

APPENDIX A

SECTION 8 PROGRAM DEFINITIONS

1. **ADJUSTED INCOME:** Annual income minus \$480 for each dependent and an allowance for certain expenses to care for children and handicapped household members. Elderly and disabled households have an additional \$400 allowance and may also deduct certain medical expenses. (*Defined in 24 CFR §5.611*).
2. **ADMISSION:** The effective date of the first Housing Assistance Payments Contract for a family (*first day of initial lease term*) in a tenant-based program. This is the point when the family becomes a participant in the Section 8 Program.
3. **ANNIVERSARY DATE:** The yearly date that reflects the family's initial move-in date for a particular unit.
4. **ANNUAL CONTRIBUTIONS CONTRACT (ACC):** A written agreement between HUD and a PHA to provide funding for operation of the program, and the PHA agrees to comply with HUD requirements for the program.
5. **ANNUAL INCOME:** The anticipated total income from all sources, monetary or not, received by the head of household and spouse (*even if temporarily absent*) and by each additional member of the family, 18 years and older, including all net income derived from assets, for the 12-month period following the effective date of initial determination or reexamination of income. (*Defined in 24 CFR §5.609*).

Annual income includes, but is not limited to: the full amount of wages and salaries; net income from a business or profession; net income of any kind from assets; periodic payments from Social Security, annuities, insurance policies, retirement income, pensions, disability or death benefits; payments in lieu of earnings; welfare assistance; alimony and regular contributions or gifts; all regular pay, special payments and allowances received by a member of the Armed Forces; payments to the head of the household for support of a minor; relocation payments made to displaced persons under the Uniform Relocation Act.

Annual income does not include: non-recurring income, defined as casual, sporadic, and irregular, gifts, reimbursements for the cost of treatment of an illness or medical care, or certain temporary foster care payments, non-recurring or sporadic income; income from employment of minors (including foster children); (income of certain care providers); lump sum additions to family assets; the full amount of student financial assistance paid directly to the student or to the educational institution; special pay to a family member serving in the Armed Forces who is exposed to hostile fire; income from certain training programs; reparation payments; earnings in excess of \$480 for each full-time student who is 18 years old or older (excluding head of household or spouse); adoption assistance payments in excess of \$480 per adopted child; refunds or rebates received by the family for property taxes paid on the dwelling unit; amounts specifically excluded by any other federal statute

from consideration as income for purposes of determining eligibility or benefits under a category of assistance programs that includes assistance under the National Housing Act of 1937 or Section 236 of the National Housing and Community Development Act of 1974.

6. **APPLICANT (Applicant Family):** A family that has applied for admission to a Section 8 Program, but is not yet a participant in the program.
7. **ASSETS:** Assets for determining eligibility for admission to, continued participation in the Section 8 Program, and for calculating Total Tenant Payment include, but are not limited to: savings, cash, resources having redemptive or interest accruing value, equity in or net cash value after deducting reasonable costs that would be incurred in disposing of real property (excluding burial plots), stocks, bonds and other forms of capital investments. The equity in a housing cooperative unit or in a manufactured home in which the family resides shall be excluded only if the family continues to reside in the cooperative unit or manufactured home after admission to the program. The value of personal property such as furniture and automobiles is to be excluded. (In cases where a trust fund has been established and the trust is not revocable by, or under the control of, any member of the family or household, the value of the trust fund will not be considered an asset so long as the fund continues to be held in trust. Any income distributed from the trust fund shall be counted when determining annual income).

In determining net family assets, the PHA shall include the value of any assets disposed of by an applicant or tenant for less than fair market value (including a disposition in trust, but not in a foreclosure or bankruptcy sale) during the two years preceding the date of application for the program or re-examination, as applicable, in excess of the consideration received therefore. In the case of a disposition as part of a separation or divorce settlement, the disposition will not be considered to be for less than fair market value if the applicant or tenant received important consideration not measurable in dollar terms.

8. **ASSISTED LEASE (Lease):** A written agreement between an owner and a family for the leasing of a dwelling unit to the family with assistance payments under a Housing Assistance Payment Contract between the owner and the PHA.
9. **CARE ATTENDANT/LIVE-IN AIDE:** A person living with a Section 8 applicant or participant, who is determined by the PHA to be essential to the care and well being of a family member; who is not obligated to support the family member; and who would not be living in the unit except to provide the supportive services.
10. **CHILD CARE EXPENSES:** Amounts anticipated to be paid by the family for the care of children under 13 years of age during the period for which annual income is computed, but only where such is necessary to enable a family member to be gainfully employed, to further his or her education, or to permit a family member to actively seek employment. The amount deducted shall reflect reasonable charges for childcare, and, in the case of childcare necessary to permit employment, the amount deducted shall not exceed the amount of income received from such employment. The amount deducted shall only be to the extent such amounts are not reimbursed.

11. **CHILD CUSTODY:** A child shall be considered to be a member of the family of a Section 8 applicant or participant if the child lives with the applicant or participant a minimum of 184 days per year.
12. **CITIZEN:** A citizen or national of the United States.
13. **COMMON SPACE:** In the case of shared housing, space available for use by the assisted family and other occupants of the unit.
14. **CONTINUOUSLY ASSISTED:** An applicant is continuously assisted under the 1937 Housing Act if the family is already receiving assistance under any 1937 Housing Act program when the family is admitted to the Voucher program. A family will be considered continuously assisted only if there is no interruption in assistance between programs.
15. **CONTIGUOUS MSA:** In portability, an MSA that shares a common boundary with the MSA in which the jurisdiction of the initial housing authority is located.
16. **CONTRACT:** See HOUSING ASSISTANCE PAYMENTS CONTRACT and HOUSING VOUCHER CONTRACT.
17. **CRIMINAL ACTIVITY:** Criminal activity is defined as follows: Criminal activity includes, but is not limited to conduct that is unlawful, forbidden by and punishable by fine and/or imprisonment under Minnesota law and local ordinances. The conduct need not be reported to a law enforcement agency, and need not result in an arrest or prosecution. Such conduct includes, but is not limited to, possession, use or sale of a small amount of marijuana, any other petty misdemeanor, and acts of physical violence or the threat of such acts. Neither proof beyond a reasonable doubt nor conviction in a court of law is necessary to establish violation of the program obligations.
18. **DATING VIOLENCE:** Violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim; and where the existence of such a relationship shall be determined based on a consideration of the following factors:
 - a. The length of the relationship.
 - b. The type of relationship.
 - c. The frequency of interaction between the persons involved in the relationship.(See Appendix M: VAWA Policy)
19. **DECENT, SAFE AND SANITARY:** Housing is decent, safe and sanitary if it meets the requirements of HUD and the PHA as established for this program.
20. **DEPENDENT:** A member of the family household (*excluding foster children or foster adults*) other than the family head or spouse, who is under 18 years of age or is a disabled person, or is a full-time student.
21. **DISABLED FAMILY:** A family whose head (including co-head), spouse, or sole member is a person with a disability. It may include two or more persons with disabilities

living together, or one or more persons with disabilities living with one or more live-in aides.

- 22. DISABLED PERSON:** A person shall be considered disabled if such person is under a disability as defined in Section 223 of the Social Security Act (42 U.S.C. 423) or in Section 102 (b) (5) of the Development Disabilities Services and Facilities Construction Amendment of 1970 (42 U.S.C. 6001 [7]). Section 223 of the Social Security Act defines disability as:

- a. Inability to engage in any substantial gainful activity by reason of any medically determinable physical or mental impairment which can be expected to result in death, or which has lasted or can be expected to last for a continuous period of not less than 12 months; or
- b. In the case of an individual who has attained the age of 55 and is blind (within the meaning of "blindness" as defined in Section 416 (i) (1) of this title), inability by reason of such blindness to engage in substantial gainful activity requiring skills or abilities comparable to those of any gainful activity in which he has previously engaged with some regularity and over a substantial period of time.

Section 102 (b) (5) of the Developmental Disabilities Services and Facilities Construction Amendments of 1970 defines disability as: a disability attributable to mental retardation, cerebral palsy, epilepsy, or another neurological condition of an individual found by the Secretary of Health and Human Services to be closely related to mental retardation or to require treatment similar to that required for mentally retarded individuals, which disability originates before such individual attains age eighteen, which has continued or can be expected to continue indefinitely and which constitutes a substantial handicap to such individual.

- 23. DISPLACED PERSON OR FAMILY:** A family or an individual about to be displaced, or who has been displaced by governmental action, or a person whose dwelling has been extensively damaged or destroyed as a result of a disaster declared or otherwise formally recognized pursuant to federal disaster relief laws.
- 24. DOMESTIC VIOLENCE:** Domestic violence includes felony or misdemeanor crimes of violence committed by a current or former spouse of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse, by a person similarly situated to a spouse of the victim under Minnesota laws on domestic or family violence, or by any other person against an adult or youth victim who is protected from that person's acts under Minnesota law.
(See Appendix M: VAWA Policy)
- 25. DRUG:** Drug means a controlled substance as defined in section 102 of the Controlled Substances Act (21 U.S.C. Section 802) and/or as defined in Minnesota Statutes, Section 152.01.

- 26. DRUG-RELATED CRIMINAL ACTIVITY:** Drug-related criminal activity means the illegal manufacture, sale, distribution, or use of a drug, or the possession of a drug with the intent to manufacture, sell, distribute or use the drug.
- 27. EIV/UIV: ENTERPRISE INCOME VERIFICATION AND UPFRONT INCOME VERIFICATION:** These online HUD data systems give the PHA access to employment and wage information from the national “New Hires” database, State Wage Income Collection Agencies (SWICA) and other data sources, starting in 2005.
- 28. ELDERLY FAMILY:** A family whose head (including co-head), spouse, or sole member is a person who is at least 62 years of age. It may include two or more persons who are at least 62 years of age living together, or one or more persons who are at least 62 years of age living with one or more live-in aides.
- 29. ENTERPRISE INCOME VERIFICATION** - See “EIV/UIV”.
- 30. EXCEPTION RENT:** In the Voucher Program, the Housing Authority may adopt a payment standard up to the exception rent limit approved by HUD for the Housing Authority Certificate Program.
- 31. EXTENDED FAMILY:** An extended family, meaning a household which includes grandparents, cousins, nieces, nephews, aunts and uncles, or other family members who are not immediate family.
- 32. EXTREMELY LOW INCOME FAMILY:** A family whose annual income does not exceed 30 percent of the median income for the area as determined by HUD and adjusted for family size.
- 33. FAIR MARKET RENT (FMR):** The rent, including the cost of utilities (except telephone), that would be required to be paid in the housing market area to obtain privately owned, existing, decent, safe and sanitary rental housing of modest (non-luxury) nature with suitable amenities in the market area. Fair Market Rents for existing housing are established by HUD for housing units of varying sizes (*number of bedrooms*).
- 34. FAMILY:** A person or group of persons, as determined by the PHA consistent with 24 CFR 5.403, approved to reside in a unit with assistance under the program. “Family” includes but is not limited to the following, regardless of actual or perceived sexual orientation, gender identity, or marital status: A single person, who may be an elderly person, displaced person, disabled person, near-elderly person, or any other single person; or a group of persons residing together, and such group includes, but is not limited to: (a) A family with or without children (A child who is temporarily away from the home because of placement in foster care is considered a member of the family.), (b) an elderly family, (c) a near-elderly family, (d) a disabled family, (e) a displaced family, or (f) the remaining member of a tenant family. 24 CFR §5.403 (2012).

35. **FAMILY RENT:** In the Voucher program, the portion of rent to owner paid by the family
36. **FAMILY SHARE:** The portion of rent and utilities paid by the family.
37. **FAMILY SELF-SUFFICIENCY PROGRAM (FSS):** The program established by the PHA to promote self-sufficiency of assisted families, including the provision of supportive services.
38. **FAMILY UNIT SIZE:** The appropriate number of bedrooms for a family. Family unit size is determined by the PHA using the PHA-adopted subsidy standards.
39. **FULL-TIME STUDENT:** A person who is carrying a subject load that is considered full-time for day students under the standards and practices of the educational institution attended. An educational institution includes a vocational school with a diploma or certificate program, as well as an institution offering a college degree.
40. **GENDER IDENTITY:** Actual or perceived gender-related characteristics.
41. **GROSS RENT:** The total of the rent to owner plus the utility allowance. If there is no utility allowance because the rent to owner includes all utilities, the gross rent and the rent to owner will be the same amount.
42. **HANDICAPPED ASSISTANCE EXPENSES:** Reasonable expenses that are anticipated, during the period for which Annual Income is computed, for attendant care and auxiliary apparatus for a family member with a handicap or disability, and that are necessary to enable a family member (including the member with a handicap or disability) to be employed, provided that the expenses are neither paid to a member of the family nor reimbursed by an outside source.
43. **HANDICAPPED PERSON:** A person will be considered handicapped if such person is determined to have a physical or mental impairment which:
- a. Is expected to be of long-continued and indefinite duration;
 - b. Substantially impedes his or her ability to live independently; and
 - c. Is of such nature that his or her ability to live independently could be improved by more suitable housing conditions.
44. **HAP CONTRACT:** See Housing Assistance Payments Contract.
45. **HEAD OF THE HOUSEHOLD:** The adult member of the family who is designated as Head of Household for purposes of determining initial and ongoing program eligibility, and who assumes legal and financial responsibility for the household.

- 46. HOUSING AGENCY/AUTHORITY (HA):** A State, county, municipality or other governmental entity or public body (*or agency or instrumentality thereof*) authorized to engage in or assist in the development or operation of low-income housing. (“PHA” and “HA” mean the same thing).
- 47. HOUSING ASSISTANCE PAYMENT:** The monthly assistance payment made by the PHA. The total assistance payment consists of:
- a. A payment to the owner for rent under the family’s lease.
 - b. An additional payment to the family if the total assistance payment exceeds the rent to owner. This additional payment is called a utility reimbursement.
- 48. HOUSING CHOICE VOUCHER (VOUCHER):** A document issued by a PHA to a family selected for admission to the Section 8 Housing Choice Voucher Program. The Voucher describes the program, and the procedures for PHA approval of a unit selected by the family. The Voucher also states the obligations of the family under the program.
- 49. HOUSING ASSISTANCE PAYMENTS CONTRACT (HAP CONTRACT):** A written contract between a Housing Authority and an owner, in the form prescribed by HUD Headquarters, in which the Housing Authority agrees to make housing assistance payments to the owner on behalf of an eligible family.
- 50. HUD:** The U.S. Department of Housing and Urban Development.
- 51. HOUSING QUALITY STANDARDS (HQS):** The HUD minimum quality standards for housing assisted under the tenant-based programs.
- 52. INCOME:** Income from all sources of each member of the household as determined in accordance with criteria established by HUD. (*See also “Annual Income.”*)
- 53. INFORMAL HEARING:** A review of the PHA’s decisions related to the individual circumstances of a participant family. The hearing will be conducted by a person who made or approved the decision under review or a subordinate of such person, at which an applicant or participant may present objections to the PHA’s action or failure to act.
- 54. INFORMAL REVIEW:** A review of PHA’s decisions denying assistance to the applicant. The review will be conducted by a person or persons other than the person who made or approved the decision under review or a subordinate of such person.
- 55. INITIAL CONTRACT RENT:** The Contract Rent to Owner at the beginning of the initial lease term.
- 56. INITIAL PHA:** In portability, the term refers to both:
- a. A Housing Authority that originally selected a family that subsequently decides to move out of the jurisdiction of the selecting Housing Authority; and

- b. A Housing Authority that absorbed a family that subsequently decides to move out of the jurisdiction of the absorbing HA.
- 57. INITIAL LEASE TERM:** The initial term of the assisted lease.
- 58. INITIAL PAYMENT STANDARD:** The payment standard at the beginning of the HAP contract term.
- 59. INITIAL RENT TO OWNER:** The rent to owner at the beginning of the HAP contract term.
- 60. JURISDICTION:** The area in which the HA has authority under state and local law to administer the program.
- 61. LEASE:**
 - 1. A written agreement between an owner and a tenant for the leasing of a dwelling unit to the tenant. The lease establishes the conditions for occupancy of the dwelling unit by a family with housing assistance payments under a Housing Assistance Payment Contract between the owner and the HA.
 - 2. In cooperative housing, a written agreement between a cooperative and a member of the cooperative. The agreement establishes the conditions for occupancy of the member's cooperative dwelling unit by the member's family with housing assistance payments to the cooperative under a HAP contract between the cooperative and the PHA. For purposes of this part 982, the cooperative is the Section 8 "owner" of the unit, and the cooperative member is the Section 8 "tenant."
- 62. LEASE ADDENDUM:** In the lease between the tenant and the owner, the lease language required by HUD.
- 63. LIVE-IN AIDE/CARE ATTENDANT:** (See Care Attendant/Live-In Aide).
- 64. LOCAL PREFERENCE:** A preference used by the PHA to select among applicant families.
- 65. LOW INCOME FAMILY:** A family whose annual income does not exceed 80 percent of the median income for area as determined by HUD and adjusted for family size.
- 66. MODERATE REHABILITATION:** Rehabilitation involving a minimum expenditure of \$1,000 for a unit, including its prorated share of work to be accomplished on common areas or systems, to:
 - a. Upgrade to decent, safe and sanitary condition to comply with the Housing Quality Standards or other standards approved by HUD, from a condition below those

standards (improvements being of a modest nature and other than routine maintenance); or

b. Repair or replace major building systems or components in danger of failure.

- 67. OWNER:** Any person or entity having the legal right to lease or sublease a unit to a Section 8 participant.
- 68. PARTICIPANT (Participant Family):** A family that has been admitted to the Section 8 Program, and is currently assisted in the program. The family becomes a participant on the effective date of the first Housing Assistance Payment contract executed by the PHA for the family (*the first day of the initial lease term*).
- 69. PAYMENT AGREEMENT:** An agreement signed between an applicant or participant and the PHA in which the applicant or participant agrees to pay, in monthly installments, a sum owed to the PHA.
- 70. PAYMENT STANDARD:** Each payment standard amount is based on the fair market rent. The PHA adopts a payment standard for each bedroom size and fair market rent in the PHA jurisdiction. The payment standard for a family is the maximum monthly subsidy payment.
- 71. PHA PLAN:** The annual plan and the 5-year plan as adopted by the PHA and approved by HUD.
- 72. PORTABILITY:** The practice of renting a dwelling unit with Section 8 tenant-based assistance outside the jurisdiction of the initial HA.
- 73. PREMISES:** The building or complex in which the dwelling unit is located including common areas and grounds.
- 74. PRIVATE SPACE:** In shared housing the portion of a contract unit that is for the exclusive use of an assisted living family.
- 75. PROJECT-BASED ASSISTANCE:** Rent assistance that is tied to the structure.
- 76. PUBLIC HOUSING AGENCY (PHA):** Any State, county, municipality or other governmental entity or public body (*or its agency or instrumentality*) that is authorized to engage in or assist in the development or operation of low-income housing used in this document to refer to the Saint Paul Public Housing Agency.
- 77. REASONABLE RENT:** A rent to owner that is not more than either:
- a. Rent charged for comparable units in the private unassisted market; or

- b. Rent charged by the owner for a comparable assisted or unassisted unit in the building or premises.
- 78. RECEIVING PHA:** In portability, a PHA that receives a family selected for participation in the tenant-based program of another PHA. The receiving PHA issues a Voucher and provides program assistance to the family.
- 79. RENT TO OWNER/CONTRACT RENT:** The total monthly rent payable to the owner under the lease for the unit. Rent to owner covers payment for any housing services, maintenance and utilities the owner is required to provide and pay for.
- 80. RESIDENCY PREFERENCE:** A PHA preference for admission of families who reside anywhere in a specified area, including families with a member who works or has been hired to work in the area. (*See “Residency Preference Area.”*)
- 81. RESIDENCY PREFERENCE AREA:** The specified area where families must reside to qualify for a residency preference.
- 82. SERVICE PERSON:** A member of the applicant’s family who is in the military forces of the United States at the time of application for housing. “Military forces” means the Army, Navy, Air Force, Marine Corps, Coast Guard and the commissioned corps of the U.S. Public Health Service.
- 83. SEXUAL ORIENTATION:** Includes homosexuality, heterosexuality, or bisexuality.
- 84. SHARED HOUSING:** A housing unit occupied by two or more families, consisting of common space for shared use by the occupants of the unit and separate private space for each family.
- 85. SINGLE PERSON:** An adult person living alone or intending to live alone and who does not qualify as an elderly family or displaced person or as the remaining adult member of a tenant family.
- 86. SINGLE ROOM OCCUPANCY (SRO) HOUSING:** A unit which contains no sanitary facilities or food preparation facilities, or which contains one but not both types of facilities, and which is suitable for occupancy by a single eligible individual.
- 87. SOCIAL SECURITY NUMBER:** The number assigned to a person by the Social Security Administration of the Department of Health and Human Services, and that identifies the record of the person's earnings and that is reported to the Administration.
- 88. SPECIAL ADMISSIONS:** HUD awarded program funding targeted for families living in specified units, or HUD authorization to use Section 8 subsidies for specific purposes (e.g. preservation or replacement cases).

- 89. SPOUSE:** The husband or wife of the head of household.
- 90. STALKING:** As defined in VAWA, “stalking” means
- (A) (i) to follow, pursue, or repeatedly commit acts with the intent to kill, injure, harass, or intimidate another person; and
 - ii) to place under surveillance with the intent to kill, injure, harass, or intimidate another person; and
 - (B) in the course of, or as a result of, such following, pursuit, surveillance, or repeatedly committed acts, to place a person in reasonable fear of the death of, or serious bodily injury to, or to cause substantial emotional harm to—
 - i) that person;
 - ii) a member of the immediate family of that person (as defined in VAWA); or
 - iii) the spouse or intimate partner of that person.
- (See Appendix M: VAWA Policy)
- 91. SUBSIDY STANDARDS:** Standards that the PHA establishes for determining the appropriate number of bedrooms and amount of subsidy for families of different sizes and compositions.
- 92. TENANT:** The person or persons (*other than a live-in aide*) who executes the lease as lessee of the dwelling unit.
- 93. TENANT-BASED:** Rental assistance that is not attached to the structure.
- 94. TOTAL TENANT PAYMENT (TTP):** The portion of the gross rent payable by an eligible family participating in the Section 8 Existing Housing Assistance Payments Program. TTP is calculated using a formula that uses the highest payment resulting from the following four options:
- a. 10 percent of total gross monthly household income,
 - b. 30 percent of monthly adjusted monthly income, or
 - c. For families receiving assistance under the Minnesota Supplemental Assistance program (MSA), that portion designated for shelter and utility costs.
 - d. The minimum rent (see Part 3).
- 95. UIV/EIV:** See “EIV/UIV”.
- 96. UPFRONT INCOME VERIFICATION** – See “EIV/UIV”
- 97. UTILITIES:** Includes electricity, gas, water, sewer and charges for other services such as garbage removal. Telephone service and cable TV service are not considered as a utility. (*See Utility Allowance*).

- 98. UTILITY ALLOWANCE:** A fixed amount allowed to the tenant as a deduction from the Total Tenant Payment for utilities purchased separately by the tenant. The amount of the allowance is based on the average estimated cost of utilities such as gas, electricity and heating fuels for living units of various bedroom sizes as determined by the PHA's Utility Allowance Schedule shown in Part III.
- 99. UTILITY REIMBURSEMENT:** A payment to the family when the total assistance payment exceeds the rent to owner.
- 100. VAWA:** The "Violence Against Women and Justice Department Reauthorization Act of 2005" (P.L. 109-162), a federal law that provides protections for victims of domestic violence, dating violence and stalking. (See Appendix M: VAWA Policy)
- 101. VERY LOW INCOME FAMILY:** A family whose annual income does not exceed 50 percent of the median income for the area as determined by HUD and adjusted for family size.
- 102. VETERAN:** Any person honorably discharged from the Armed Forces of the United States after serving for 181 consecutive days or more, or who served under the direction of the Armed Forces and clandestine forces of the United States.
- 103. VIOLENT CRIMINAL ACTIVITY:** Any illegal criminal activity that has as one of its elements the use, attempted use, or threatened use of physical force against the person or property of another.
- 104. VOUCHER:** (Rental Voucher). A document issued by a PHA to a family selected for admission to the Voucher Program. The Voucher describes the program, and the procedures for PHA approval of a unit selected by the family. The Voucher also states the obligations of the family under the program.
- 105. WELFARE ASSISTANCE:** Welfare or other payments to families or individuals, based on need, that are made under programs funded separately or jointly by federal, state or local governments.

Section 8 Existing Moderate Rehabilitation Program

Appendix B

- I. Applicable Policies:** Participants in the Section 8 Moderate Rehabilitation Program will be governed by all applicable terms and conditions outlined in the Section 8 Admission and Occupancy Policies.
- II. Waiting List:** The PHA will refer all eligible applicants on the waiting list for the Section 8 Existing Housing Program to owners of units assisted through the Section 8 Existing Moderate Rehabilitation Program. As vacancies occur, the selection of applicants to be referred to this program will be in accordance with the provisions of Part II: Applicant Selection, of the Section 8 Administrative Policies.
- III. Fair Market Rents:** Effective October 1, 1994, the rent, including allowance for utilities, range, refrigerator, management, maintenance, other services, and debt service for the rehabilitation loan, shall not exceed the FMRs as listed annually in the Federal Register.
- IV. Statement of Family Responsibility:** A family who is determined to be eligible to participate in the Moderate Rehabilitation program will be issued a Statement of Family Responsibility. Program participants must comply with all terms and conditions of the Statement of Family Responsibility.
- V. Ineligible Families:** If the PHA determines that the family either is under-utilizing or overcrowding the unit due to a change in the family composition, the PHA will assist the family in locating another Moderate Rehabilitation unit of the appropriate size. If such a unit is not available, the PHA will offer continued assistance through other programs administered by the PHA.
- VI. Termination of Assistance:** In addition to other conditions governing termination of assistance as outlined herein, assistance through the Section 8 Existing Moderate Rehabilitation Program will terminate when a family voluntarily vacates a Section 8 Existing Moderate Rehabilitation unit.

Appendix C

Minimum Rent Payment Waiver Based on Hardship

Overview:

Minimum Rent Payment Waiver Based on Hardship: The PHA has set a minimum rent. However, if the family requests a hardship exemption, the PHA will immediately suspend the minimum rent for the family until the PHA can determine whether the hardship exists and whether the hardship is of a temporary or long-term nature. It is the family's responsibility to provide the information supporting the claimed hardship.

A. A hardship exists in the following circumstances:

1. When the family has lost eligibility for or is waiting for an eligibility determination for a federal, state, or local assistance program;
2. When the family would be evicted as a result of the imposition of the minimum rent requirement;
3. When the income of the family has decreased because of changed circumstances, including loss of employment.
4. When the family has an increase in expenses because of changed circumstances, for medical costs, childcare, transportation, education, or similar items;
5. When a death has occurred in the family.

B. No hardship: If the PHA determines there is no qualifying hardship, the minimum rent will be reinstated, including requiring back payment of minimum rent for the time of suspension. The PHA will offer the family an opportunity to sign a Payment Agreement for any rent not paid during the period of suspension. During the suspension period the PHA will not evict the family for non-payment of the amount of tenant rent owed for the suspension period.

C. Temporary hardship: If the PHA reasonably determines that there is a qualifying hardship but that it is of a temporary nature, the minimum rent will not be imposed for a period of 90 days from the date of the family's request. At the end of the 90-day period, the minimum rent will be imposed retroactively to the time of suspension. The PHA will offer the family an opportunity to sign a Payment Agreement for any rent not paid during the period of suspension. During the suspension period the PHA will not evict the family for non-payment of the amount of tenant rent owed for the suspension

period.

D. Long-term hardship. If the PHA determines there is a long-term hardship, the family will be exempt from the minimum rent requirement until the hardship no longer exists. The family must verify the continuation of the hardship at least quarterly.

E. Appeals. The family may use the grievance procedure to appeal the PHA's determination regarding the hardship. No escrow deposit will be required in order to access the grievance procedure.

APPENDIX D

SHARED HOUSING PROGRAM

I. INTRODUCTION

The PHA has adopted a Shared Housing Program as an option available to elderly, persons with a handicap or disability, or families who hold a one bedroom Section 8 Voucher and wish to voluntarily share a housing unit with another individual or family. Persons who are not assisted under the Section 8 Voucher Program may reside in a Shared Housing unit with one or more families who are assisted under the Voucher Program. All unit sizes, except efficiency and one-bedroom units, may be used for Shared Housing.

II. APPLICABLE POLICIES

The Shared Housing option applies only to the Section 8 Voucher Program. In all areas not specifically addressed below, the policies established by the PHA to govern the Section 8 Shared Housing option are the same as the policies contained in the Section 8 Admission and Occupancies Policies.

A. The decision to participate in Shared Housing is voluntary by all parties including the PHA, owners and participating families.

1. The PHA will limit the Shared Housing option to:
 - a. The Individual Lease form of Shared Housing;
 - b. One bedroom Voucher holders who are persons with a handicap, disability or elderly; or
 - c. All unit sizes except efficiency (0 bedroom) and 1-bedroom units.
2. The PHA may, at any time, change its decision to include Shared Housing, or the type of Shared Housing, in its program. If the PHA first permits the use of Shared Housing, but later decides not to continue to include Shared Housing in the Section 8 Voucher Program, or later decides to change the type of Shared Housing included in its program, the PHA must continue to administer, in accordance with applicable requirements, any Shared Housing Assistance Payment Contracts that have been executed.

B. Occupancy of a Shared Housing unit may include any of the following situations:

1. Persons who are not assisted under the Section 8 Voucher Program may reside in a Shared Housing unit with one or more families assisted under the Voucher Program.
2. An owner of a Shared Housing unit may reside in the unit and, as resident owner, may enter into a Housing Assistance Payment Contract with the PHA. Housing assistance may not be provided on behalf of the owner. A person assisted in a Shared Housing unit may not be related by blood, marriage, or adoption to an owner residing in the unit.
3. One or more families may be assisted in a unit under the Individual Lease Shared Housing arrangement. Each family is assisted under a separate Housing Assistance Payment Contract.
4. At the time Voucher holders enter Shared Housing arrangements they must be sufficiently capable of independent living so as not to need supportive services.
5. In cases where two persons wish to live together, the PHA has the discretion to determine whether the living arrangement should be treated as one family (not in a shared arrangement) or two independent families sharing a Shared Housing unit.
6. An elderly person or family with a live-in-aide who is essential to the care of the elderly family, who is not obligated for financial support of the family, and who is living in the unit only to provide supportive services does not constitute a Shared Housing Arrangement. However, an assisted elderly family with a live in aide may reside in Shared Housing.

C. Units in structures of various types may be used for Shared Housing (*including single family homes and multi-family buildings*) with the following restrictions:

1. Single room occupancy units, zero bedroom efficiency units, independent group residences and congregate housing units may not be used for Shared Housing.
2. Any unit used for Shared Housing must meet the Housing Quality Standards as defined in Part Four: Unit Selection, of the Section 8 Admission and Occupancy Policies.
3. The facilities available for use by each assisted family in Shared Housing under the family's lease must include, whether in the family's private space or in the common space, a living room, sanitary facilities, food preparation and refuse disposal facilities.

4. The unit must contain private space consisting of at least one bedroom for the exclusive use of each assisted family, plus common space for shared use by the occupants of the unit.
- D.** Rent to owner for Shared Housing units will be limited by the pro-rata portion of the reasonable rent for the shared housing unit.
1. The assisted family's pro-rata portion of the rent to owner is calculated by multiplying the amount to be pro-rated by a ratio derived by dividing the number of bedrooms in the private space available for occupancy by the assisted family by the total number of bedrooms in the unit.
 2. The amount of the utility allowance for an assisted family is the pro-rata portion of the utility allowance for the entire unit.
 3. Where a Shared Housing unit is shared with unassisted families whose rents are not known, the PHA must impute a rent for the entire unit in order to determine the appropriate Annual Adjustment Factor to be used. The imputed rent is based on a comparison of the unit with other comparable units as is done for determination of rent reasonableness.

The Payment Standard for a family that resides in a Shared Housing is the lower of:

- a. The Payment Standard amount on the PHA Payment Standard Schedule for the family unit size; or
- b. The pro-rata portion of the Payment Standard on the PHA Payment Standard Schedule for the size of the shared housing unit.

Appendix E

Family Self-Sufficiency Program

I. Overview

- A. Purpose of Program:** The purpose of the Family Self-Sufficiency Program (FSS) is to provide the support eligible families need to move toward economic self-sufficiency. Support is provided, in part, by linking the family with needed public and private support services and resources.

II. FSS Program Elements

- A. HUD Requirement for FSS:** HUD mandates the PHA operate a FSS Program. To establish the minimum program size, HUD required the PHA to create a number of slots in the FSS Program equivalent to the number of units provided for by additional Section 8 or public housing funding increments. The minimum program size was built over a five-year period of time beginning in October 1993. Effective October 20, 1998, the requirement to add FSS slots for new funding increments was eliminated. In addition, the minimum program size will be reduced by one family for each FSS graduate fulfilling the family's contract of participation obligations on or after October 21, 1998.
- B. Eligible Program Participants:** The PHA conducts outreach and solicits participation from current Section 8 participants and public housing residents. Participation is voluntary for eligible families.
- C. Requirements for Participation:** Program requirements include:
1. The designated head of each family participating in the FSS Program must execute an FSS contract of participation with the PHA. The contract includes:
 - a. An individual training and services plan for the family,
 - b. Principal terms and conditions governing FSS participation,
 - c. Specific rights and responsibilities of the FSS family and the PHA,
 - d. Services to be provided, and
 - e. Activities to be completed by the head of the FSS family and each adult member of the family who elects to participate in the program.
 2. Participants must maintain monthly contact with their case manager to include at least a quarterly in-person review. (Case management is usually assumed by an agency outside of the PHA.)

3. Participants must meet annually with the FSS Coordinator to document the progress the family is making toward their goals and, if needed, revise the training and services plan.
4. School or training attendance must be maintained at 90% or higher. All students must maintain a “C” average or better.
5. The head of the family must seek and maintain suitable employment after completion of the job training programs listed in the individual training and services plan.

D. Incentives to Participate:

1. The PHA creates an escrow account for each FSS participant who obtains employment.
 - a. As the family’s earnings increase over time, the escrow account is credited with a portion of the amount of increased rent they pay due to increases in earned income.
 - b. The family may withdraw funds from the escrow account before completion of the contract if the money is needed to complete contract goals. To be eligible the family must have achieved certain interim goals as determined by the PHA.
 - c. Upon completion of the FSS Contract of Participation, the family may receive the balance in their escrow account after any amount owed to the PHA has been deducted. Successful completion requires that the family no longer receive welfare assistance, although they still may receive housing assistance.
2. FSS participants may receive supportive services from various community resources. Available supportive services may include: child care; remedial, secondary, and post secondary education; job training, counseling, and placement; substance abuse counseling and limited treatment referrals; training in parenting, homemaking, and money management skills; and homeownership counseling. The family’s individual training and services plan or the participant’s case manager will designate which resources may be awarded to assist the family in fulfilling the terms of their FSS contract of participation.

E. Coordination with Section 8 Assistance:

1. Enrollment and participation in the FSS Program are coordinated with the activities of the family’s continued eligibility for Section 8 rent assistance.
2. FSS families must meet all required family obligations listed on their Section 8 certificate or voucher and the terms of their assisted lease. *(See Part Six of the Section 8 Leasing and Occupancy Policies for a further discussion of requirements for continued participation.)*

3. Families being assisted by Section 8 are not required to participate in the FSS Program if it is offered to them. This decision will not affect their right to continued occupancy in accordance with their Section 8 assisted lease.

F. Completion of the Contract of Participation: Completion of the contract occurs when the PHA determines that:

1. The family has fulfilled all of its responsibilities under the contract; or
2. Thirty percent of the family's monthly adjusted income equals or is greater than the fair market rent amount for the unit size for which the family qualifies; and
3. The head of the family certifies to the PHA that no member of the family is receiving welfare assistance.

The initial contract term is five years. The contract may be extended, in writing, and at the family's request, for up to two years for good cause.

G. Contract Termination or Declaring the Contract Null and Void: The reasons why the PHA may terminate a contract or declare it null and void include the items listed below. If the contract is terminated or declared null and void, the family has no right to receive funds from the family's FSS escrow account. The PHA must close the account and may use the funds for purposes in accordance with HUD requirements. In addition to forfeiting the escrow account, a family's Section 8 rental assistance may be terminated if any member of the family does not meet his or her responsibilities under the FSS contract.

1. The family and the PHA agree to terminate the contract;
2. The PHA determines the family has not fulfilled its responsibilities under the contract;
3. The family withdraws from the FSS Program;
4. An act occurs that is inconsistent with the purposes of the FSS Program;
5. Resources and services necessary to complete the contract are not available; and/or
6. The family's Section 8 assistance is terminated in accordance with HUD requirements.

H. Informal Hearing: Families may request an informal hearing after being notified the PHA has taken adverse action.

Appendix F

Equal Opportunity Housing Plan

I. Overview

Agency Commitment to Fair Housing: The PHA will work cooperatively with community representatives and other units of government to ensure nondiscrimination in PHA programs and to affirmatively further fair housing objectives. The PHA will monitor its performance in implementing this plan to ensure continued progress in meeting its equal opportunity housing objectives.

PHA Employee Responsibility: Any PHA employee who does not comply with the Equal Opportunity Housing Plan as set forth herein is subject to disciplinary action. Employees are responsible for notifying their supervisor or the EEO/AA Officer of all equal opportunity problems and concerns.

Applicable Laws: It is the policy of the PHA to comply fully with Title VI. of the Civil Rights Act of 1964, Title VII. and Section 3 of the Civil Rights Act of 1968 (*as amended by the Community Development Act of 1974*), Executive Order 11063, Section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, the Americans with Disabilities Act; the Fair Housing Act Amendment of 1988, and any legislation protecting the individual rights of residents, applicants or staff which may subsequently be enacted.

II. Non-Discrimination

A. The PHA will not discriminate against any eligible applicant or resident because of:

1. Race
2. Color
3. Religion
4. Creed
5. National origin or ancestry
6. Sex
7. Age
8. Handicap
9. Disability
10. Receipt of public assistance
11. Marital status
12. Sexual or affectional orientation, or
13. Political or other affiliation.

- B.** The PHA will not, on the basis of race, color, religion, creed, national origin or ancestry, sex, age, handicap, disability, receipt of public assistance, marital status, sexual or affectional orientation, political or other affiliation:
1. Deny any family the opportunity to apply for housing, nor deny any eligible applicant the opportunity to lease housing suitable to their needs within available resources,
 2. Subject a person to segregation or disparate treatment in the application for and participation in assisted housing programs,
 3. Restrict a person's access to any comparable assistance enjoyed by others participating in assisted housing programs, nor
 4. Treat a person differently in determining eligibility or other requirements for admission.

III. Housing Accessibility

- A.** The PHA will seek to identify and eliminate practices or procedures which create a barrier to equal housing opportunity for all.
- B.** The PHA will, to the maximum extent feasible, endeavor to make physical or procedural changes which will ensure that no applicant or tenant is discriminated against on the basis of a handicap or disability.

IV. Equal Opportunity Housing Objectives

The PHA has adopted the following Equal Opportunity Housing objectives:

- A. Objective A:** Provide outreach to lower-income individuals and families and those persons identified as least likely to apply for housing assistance.
1. The PHA will publish information regarding its housing programs including, but not limited to:
 - a. Section 8 Program application openings,
 - b. Public Housing Program application openings,

- c. Changes in the Section 8 or Public Housing Programs and/or PHA and HUD policies and procedures that may affect the status of persons on the waiting list or those persons participating in the programs, and
 - d. General information regarding PHA housing assistance programs.
- 2. The preceding information will be provided to the following persons or groups, as appropriate to the particular subject matter:
 - a. The general public
 - b. Public agencies and social service organizations
 - c. Lower income individuals and families
 - d. Persons identified as least likely to apply for housing assistance
 - e. Public Housing Program applicants and residents
 - f. Section 8 Program applicants and participants
 - g. Landlords/owners participating in the Section 8 Program
 - h. Other landlords/owners of rental property, and
- 3. The PHA will advertise, as appropriate to the particular subject matter, in a variety of media that are likely to reach diverse populations, including, but not limited to:
 - a. Newspapers of general circulation,
 - b. Neighborhood-based newspapers,
 - c. Minority newspapers,
 - d. Area radio stations,
 - e. Radio Talking Book, and
 - f. Area television stations.
- 4. The PHA will identify and develop specific outreach efforts for those persons or groups of persons least likely to apply for housing assistance.

B. Objective B: Promote greater housing opportunities for individuals and families outside areas of low-income and minority concentration.

1. The PHA will continue its efforts to avoid the concentration of rental public housing units by acquiring scattered site public housing units throughout the city of Saint Paul in any future development programs in cooperation with the City of Saint Paul and in conjunction with the city's overall housing plan.
2. The PHA will continue to apply for Section 8 Certificates and Vouchers because they provide greater housing choices by:
 - a. Allowing applicants and participants to find suitable and eligible rental housing in the private market, and
 - b. Offering families more options through the portability feature.
3. The PHA will continue to assist housing program applicants, residents, and participants in selecting housing and neighborhoods of their choice through the following resources:
 - a. **Public Housing.** The PHA Rental Resource Center, located in the PHA Rental Office, provides information about the properties and neighborhood characteristics of the various PHA public housing sites.
 - b. **Public Housing Hi-Rises.** The "informed choice" procedure for public housing hi-rise applicants at the top of the waiting list provides them with extensive information before they select their unit. They are provided information about those buildings with available vacant units, including services and amenities available to neighborhood and building residents, a floor plan of the buildings, and an opportunity to view the unit.
 - c. **Section 8.** A list of units for rent and a brief description of those units is available at the front desk of the PHA Rental Office for public review by Section 8 Program applicants and participants. Individuals and families will also be referred to the Saint Paul Housing Information Office for further assistance.
4. The PHA will continue to encourage landlords/owners with units outside areas of low-income or minority concentration to participate in the Section 8 Program by the following actions:
 - a. Conducting landlord/owner workshops at least annually.

- b. Responding to requests for presentations at various meetings and conferences for property owners and managers.
 - c. Conducting occasional targeted mailings to landlords/owners; and
 - d. Mailing informational packets to participating and prospective landlords/owners as requested.
 - 5. The PHA will continue to participate in quarterly meetings with other metropolitan and non-metropolitan Housing Authorities to promote the use of the Section 8 portability feature and coordinate processing procedures for Section 8 participants transferring between jurisdictions.
 - 6. The PHA will continue to support and promote regional affordable housing opportunities by providing technical assistance to neighboring jurisdictions regarding the development of new lower-income housing in their communities.
- C. Objective C:** Assure that all applicants have equal opportunity to apply and be selected for participation in all PHA housing programs.

The PHA will comply with its policies and procedures as stated in the Public Housing Admission and Occupancy Policies and the Section 8 Admission and Occupancy Policies regarding all aspects of application and selection for assistance, and continued participation in its housing assistance programs.

- D. Objective D:** Serve and assist individuals and families who allege they have encountered discrimination while securing housing assistance.
- 1. Briefings for Section 8 Program participants include information on their housing rights and the process for pursuing a complaint if they allege discriminatory treatment.
 - 2. When requested, the PHA will provide housing program applicants and participants with a list of organizations which can assist them with discrimination allegations and investigations, including, but not limited to the following:
 - a. Saint Paul Department of Human Rights,
 - b. Minnesota Department of Human Rights,
 - c. Fair Housing Division of the Minnesota Office of the U.S. Department of Housing and Urban Development, and the

- d. Southern Minnesota Regional Legal Services, Inc.

Appendix G

Informal Review and Hearing Procedures

I. Overview

Applicants for the Section 8 Programs who have been notified in writing of a PHA determination to deny assistance and the reasons for that determination shall be given an opportunity for an informal review of the PHA decision. Participants in the Section 8 Housing Choice Voucher Program who have been notified in writing of a PHA determination relating to the individual circumstances of the family shall be given an opportunity for an informal hearing before the PHA terminates housing assistance payments for the family.

II. Definitions

- A. **Applicant:** A family that has applied for admission to a Section 8 Program, but is not yet a participant in the program.
- B. **Voucher Holder:** A family holding a Voucher for the tenant-based Voucher Program with unexpired search time.
- C. **Participant:** A family that has been admitted to a PHA Section 8 Program and is currently assisted in the program or is contesting a determination made by the PHA regarding their Section 8 Rent Assistance.
- D. **Hearing Officer:** A person designated by the PHA to conduct an informal hearing for a participant, other than the person who made or approved the decision under review.
- E. **Informal Review:** An opportunity given to a program applicant to contest a determination of their ineligibility for Section 8 Rent Assistance.
- F. **Informal Hearing:** An opportunity given to a program participant to contest a determination made regarding their Section 8 Rent Assistance.

III. Applicant Request For An Informal Review

(See Part I, VII.B. of Section 8 Admission and Occupancy Policies.)

- A. **Request for Review:** The PHA must give an applicant an opportunity for an informal review of a PHA determination denying assistance. The applicant must submit a written request for a review to the Section 8 Programs Manager within 10 working days from the date of the PHA letter of ineligibility was sent to the complainant.
- B. **Scheduling the Review:** When the PHA receives the written request for a review, it will notify the applicant in writing of the date, time and location of the review. A copy of the procedures governing the review will be included with the written notification.

- C. **Failure to Request a Review:** If the applicant does not request a review in accordance with these procedures, then the PHA determination of ineligibility will become final. Failure to request a review will not constitute a waiver by the applicant of his/her right to contest the PHA determination in an appropriate judicial proceeding.
- D. **The PHA will not provide an informal review in the following instances:**
 - 1. Discretionary administrative determinations by the PHA.
 - 2. General policy issues or class grievances.
 - 3. A determination of the family unit size under the PHA Subsidy Standards.
 - 4. A PHA determination not to approve an extension or suspension of a voucher term.
 - 5. A PHA determination not to grant approval to lease a unit under the program or to approve proposed lease.
 - 6. A PHA determination that a unit selected by the applicant is not in compliance with HQS.
 - 7. A PHA determination that the unit selected is not in accordance with HQS because of the family size or composition.

IV. Procedures Governing An Informal Review

- A. The review will be to consider whether the PHA determination relating to the individual circumstances of an applicant family are in accordance with applicable laws, HUD regulations and PHA policies. The review will be conducted by a person designated by the PHA, other than the person who made or approved the decision under review or a subordinate of that person.
- B. The PHA will present its reasons and evidence supporting the denial of assistance to the applicant.
- C. The applicant will have the opportunity to present written or oral objections to the PHA determination, along with other factual or mitigating information. Any additional documentation the applicant intends to present at the review must be given to the PHA at least 3 working days prior to the review. If documentation is not submitted to the PHA prior to the review, the PHA may object to its admission at the review.
- D. The applicant shall have the right to:
 - 1. Obtain an attorney or other representation if desired, at his/her own expense, and to have relevant fact witnesses attend the review to speak on their behalf. The applicant shall provide the PHA with the names and contact information for any witnesses they intend to call at least 3 working days prior to the review. If the name and contact information of any witness is not provided to the PHA prior to the hearing, the PHA may object to the witness's testimony at the review.

2. Examine before the day of the review, all documents and regulations of the PHA that are relevant to review and may copy such documents at his/her own expense.
 3. A timely decision made by the person conducting the review that is based on the information presented at the review and the law, HUD regulations and PHA policies.
- E. If the applicant fails to appear at the scheduled review, the original determination of the PHA shall become final and take effect immediately. No new review will be granted unless the applicant is able to demonstrate to the PHA, by clear and compelling evidence, that their failure to appear or meet the deadline was caused by circumstances beyond their control.
 - F. The reviewer will notify the applicant of the final decision after the informal review, including a brief statement of the reasons for it.

V. Participant Request For An Informal Hearing

(See Part 6, VIII. B. of Section 8 Admission and Occupancy Policies.)

- A. **Request for Hearing:** The PHA must give a participant an opportunity for an informal hearing on certain PHA determinations relating to the individual circumstances of a participant family. The hearing is held to consider whether PHA decisions related to the family circumstances are in accordance with the law, HUD regulations and PHA policies. A participant must submit a written request for a review to the Section 8 Programs Manager within 10 working days from the date the PHA letter of determination was sent to the participant.
- B. **Scheduling the Hearing:** The hearing will be scheduled as soon as practicable following the date the PHA receives the written request for a hearing. The participant will be notified in writing of the date, time and location of the hearing. The informal hearing will be held before a Hearing Officer. A copy of the procedures governing the hearing will be included with the written notification.
 1. **Rescheduling the Hearing.** The PHA will reschedule the hearing once, at the request of the participant, for any reason.
 2. **Cancellation of Hearing.** Once the hearing has been rescheduled, the PHA will not approve a subsequent request for rescheduling. If the participant fails to attend the hearing at the rescheduled time, the hearing request will be canceled and the PHA's original decision will be final.
- C. **Failure to Request a Hearing:** If the participant does not request a hearing in accordance with these procedures, the PHA determination will become final. Failure to request a hearing will not constitute a waiver by the participant of his/her right to contest the PHA determination in an appropriate judicial proceeding.
- D. **When a Hearing is Required:** The PHA must give a participant family an opportunity for an informal hearing to consider whether the following PHA

decisions relating to the individual circumstances of a participant family are in accordance with applicable laws, HUD regulations and PHA policies.

1. A PHA determination of the family's income and the use of such income to compute the housing assistance payment.
 2. A PHA determination of the family unit size under the PHA subsidy standards.
 3. A PHA determination of the appropriate utility allowance for the family from the PHA utility allowance schedule.
 4. A PHA determination to terminate assistance because of the family's actions or failure to act.
 5. A PHA determination to terminate assistance because the family has been absent from the unit for longer than the maximum period permitted under PHA policy and HUD rules.
- E. **The PHA will not provide a participant family an opportunity for an informal hearing in the following instances:**
1. Discretionary administrative determinations by the PHA.
 2. General policy issues or class grievances.
 3. Establishment of the PHA schedule of utility allowances for families in the program.
 4. A PHA determination to approve an extension or suspension of a voucher term.
 5. A PHA determination not to approve a unit or lease.
 6. A PHA determination that an assisted unit is not in compliance with HQS.
 7. A PHA determination that the unit is not in accordance with HQS because of the family size.
 8. A determination by the PHA to exercise or not exercise any right or remedy against the owner under a HAP contract.

VI. Procedures Governing An Informal Hearing

- A. The hearing will be held before the PHA Section 8 Hearing Officer.
- B. The PHA will present its reasons and evidence for its determination as it affects the participant family.
- C. The participant will have the opportunity to present written or oral objections to the PHA decision, along with other factual information that might lead the Hearing Officer to reconsider or reverse the determination. Any additional documentation the participant intends to present at the hearing must be given to the PHA at least 3 working days prior to the hearing. If documentation is not submitted to the PHA prior to the hearing, the PHA may object to its admission at the hearing.

- D. The participant shall have the right to:
1. Obtain an attorney or other representation if desired, at his/her own expense, and to have relevant fact witnesses attend the hearing to speak on their behalf. The participant shall provide the PHA with the names and contact information for any witnesses they intend to call at least 3 working days prior to the review. If the name and contact information of any witness is not provided to the PHA prior to the hearing, the PHA may object to the witness's testimony at the hearing.
 2. Examine before the day of the hearing any PHA documents and regulations of the PHA that are directly relevant to the hearing. The participant may copy such documents at his/her own expense. If the PHA does not make the document available for examination on request of the family, the PHA may not rely on the document at the hearing;
 3. Question any witness or witnesses;
 4. Request, in writing, that pertinent PHA staff be available or present at the hearing to answer questions relevant to the case.
 5. Present testimony and evidence in his/her favor; and
 6. A decision made by the Hearing Officer that is based solely on the evidence presented at the hearing.
- E. The PHA must be given the opportunity to examine at the PHA offices before the day of the hearing any of the participant's documents that are directly relevant to the hearing. The PHA must be allowed to copy any such document at the PHA's expense. If the participant does not make the document available at least three business days before the hearing date for examination after a request by the PHA, the participant may not rely on the document at the hearing.
- F. The hearing will be conducted informally by the Hearing Officer. The Hearing Officer will require that the PHA, the participant, witnesses and other persons in attendance conduct themselves in an orderly fashion. Failure to comply with the directives of the Hearing Officer to maintain order may result in expulsion from the proceeding or in a decision adverse to the interests of the disorderly party.
- G. The participant or the PHA may agree in advance and at the expense of the party making the arrangement, for a transcript of the hearing.
- H. Based on information provided at the hearing, the Hearing Officer may ask the participant to provide additional information after the hearing, but within the time a decision must be rendered. Any request for additional information shall not affect the timeliness of the decision.
- I. If the participant fails to appear at the scheduled hearing or fails to meet a deadline imposed by the Hearing Officer, the original determination of the PHA shall become final and take effect immediately. No new hearing will be granted unless the participant is able to demonstrate to the PHA, by clear and

compelling evidence, that their failure to appear or meet the deadline was caused by circumstances beyond their control.

- J. **Basis for Decision:** The Hearing Officer will determine whether the PHA's action or decision is consistent with federal law, HUD regulations and PHA policies, based upon the evidence and testimony provided at the hearing. Factual determinations relating to the individual circumstances of the participant will be based on a preponderance of the evidence presented at the hearing. Both the participant and the PHA will be notified of the Hearing Officer's determination.

VII. Decision of the PHA Section 8 Hearing Officer

- A. The Hearing Officer will prepare a written decision within 10 working days after the review or hearing. A copy of the decision will be sent to the participant and to the PHA.
- B. The decision shall include:
 - 1. A clear statement of the Hearing Officer's findings, conclusion and decision, including an express determination of the credibility of witnesses and any reasons for discrediting pertinent testimony;
 - 2. A clear summary of the decision and explanation of the reasons;
 - 3. If the decision involves money owed, a clear statement of the amount owed, and documentation of the calculation of the amount owed; and
 - 4. The date the decision is effective.
- C. The PHA shall abide by the determination of the Hearing Officer, provided that such determination is not contrary to applicable federal, State or local laws, HUD regulations, or the requirements of the Annual Contributions Contract between HUD and the PHA, or that the Hearing Officer is not acting in excess of his/her authority.
- D. A decision by the Hearing Officer in favor of the PHA, or which denies the relief requested by the participant in whole or in part, shall not constitute a waiver of, nor affect any rights the participant may have to contest the PHA's determination in an appropriate judicial proceeding.

APPENDIX H SPECIAL ALLOCATIONS

I. OVERVIEW

At times the PHA receives limited allocations of Section 8 Vouchers for specific groups of families needing rent assistance.

Eligible Applicants: Except as specified in a particular NOFA or grant award, an applicant must meet the Section 8 eligibility requirements as well as qualify under the specific guidelines for the special program. *(See Part 1 of the Section 8 Admission and Occupancy Policies for additional guidance on Section 8 eligibility requirements.)*

- A. Applicants for the Family Unification Program (FUP)** must be referred by Ramsey County Community Human Services Department.
- B. Applications for the Mainstream Program:** Eligible applications are taken from the regular Section 8 waiting list according to established waiting list policies.
- C. Applicants for Veterans Administration – Supportive Housing (VASH) Program** vouchers must be referred by the Veterans Administration.
- D. Section 811 Project-Based Rental Assistance (PBRA) Demonstration:** Eligible applicants are households on the regular Section 8 waiting list whose head, spouse or sole member is a non-elderly person with a disability.
- E. Applications for the Mainstream Preference (Non-Elderly Disabled)** must be referred by one of the PHA's qualified partnering agencies.
- F. Applications for the Move-Up Preference** must be referred by the Ramsey County Continuum of Care.

II. SPECIAL PROGRAMS

- A. Family Unification Program (FUP):** The PHA has a special allocation of FUP Vouchers that it uses in compliance with HUD requirements for the program.
 - a. A FUP-Eligible Family is defined as a family that the Public Child Welfare Agency (PCWA) has certified as a family for whom the lack of adequate housing is a primary factor in the imminent placement of the family's child, or children, in/out-of-home care, or in the delay of discharge of a child, or children, to the family from out-of-home care, and that the PHA has

determined is eligible for a Housing Choice Voucher (HCV). Referrals for these vouchers come from Ramsey County Child Protection.

- b. A FUP-Eligible Youth is defined as a youth that the PCWA has certified to be at least 18 years old, and not more than 24 years of age, and who has left foster care, or will leave foster care within 90 days, in accordance with a transition plan described in section 475(5)(H) of the Social Security Act, and is homeless or is at risk of becoming homeless at age 16 or older. Referrals for these vouchers come from Ramsey County Coordinated Entry (Continuum of Care).
1. The family or youth must meet the income and FUP eligibility requirements for Section 8 Rent Assistance as determined by the St. Paul Public Housing Agency (PHA). There are no required unit sizes of Vouchers or households for this program. A Voucher will be issued based on the PHA subsidy standards and individual needs of the family or youth.
 - a) Annual family income must be under the limits as shown on page 1-5 of Part One of the Section 8 Admission and Occupancy Policies.
 2. Affirmatively Furthering Fair Housing. The PHA will take reasonable steps to affirmatively further fair housing in regards to FUP vouchers. Reasonable steps will include:
 - a) To the extent practicable, identifying and ensuring certification of FUP eligible families and youth that may be on the PHA's waiting list and ensuring that the youth maintain their original position on the waiting list after certification.
 - b) Appropriately placing all FUP eligible families and youth referred from the PCWA and/or Coordinated Entry/Continuum of Care/COC on the HCV waiting list in order of first come, first served.
 - c) Informing applicants on how to file a fair housing complaint including the provision of the toll free number for the Housing Discrimination Hotline: 1-800-669-9777.
 - d) The PHA will also comply with the affirmatively furthering fair housing requirements of 24 CFR Section 903.7(o).

B. Mainstream Program/Disability Vouchers: The PHA has a special allocation of Vouchers to assist families whose Head, spouse or sole member is a person with a disability.

1. The PHA encourages participants in the Mainstream Program or Disability Voucher Program to use HousingLink's online database and search tools to locate accessible

units where vouchers are accepted. To the extent possible, the PHA will offer referrals to public and private funding sources that may be able to assist with apartment modification expenses.

2. When the PHA is drawing names from its waiting list, a family who is determined to be eligible for a Housing Choice Voucher (HCV) and whose head, spouse, or sole member is a person with a disability, will be issued a Mainstream/Disability voucher, if one is available.
3. When the PHA is not drawing names from its waiting list due to overutilization of regular HCVs or insufficient funding for them, if a Mainstream/Disability voucher becomes available the PHA may assign that voucher to an eligible family who is currently assisted with a regular HCV and who was originally drawn from the regular voucher waiting list. This procedure will maximize utilization of the special purpose vouchers.

C. Veterans Administration – Supportive Housing (VASH) Program: The PHA has a special allocation of VASH vouchers to provide assistance to homeless veterans.

1. Applicants for VASH vouchers must be referred by the Veterans Administration.
2. Annual family income must be under the limits as shown in Part One of the Section 8 Admission and Occupancy Policies.
3. There are no required unit sizes of Vouchers or households for this program. A Voucher will be issued based on the PHA subsidy standards and individual needs of the family.
4. As required by HUD rules, VASH applicants will not be screened for housing history or criminal history, except to determine if an applicant is subject to a lifetime registration requirement as a sex offender. Such persons are not eligible for VASH vouchers.
5. The PHA will give priority to an initial inspection of a unit selected by a new recipient of a VASH voucher.

D. Section 811 Project Rental Assistance (PRA) Demonstration: To support Minnesota Housing's Section 811 PRA Demonstration program (a special grant from HUD to Minnesota Housing), the PHA committed up to 30 Housing Choice Vouchers from its current allocation, to be issued to eligible households on the regular HCV waiting list whose head, spouse or sole member is a non-elderly person with a disability.

1. To issue and lease up the set aside of 30 HCVs from the next 100 issued and leased up from the waiting list, those households may be given priority over other applicants

on the waiting list beginning November 1, 2015. This is a one-time commitment; the priority for admission will end after the 30 HCVs have been leased up.

2. Upon turnover those 30 HCVs will be returned to the general pool, to be re-issued to another family on the waiting list or in PBV-assisted housing when the PHA is issuing vouchers.
3. The PHA will follow all of the rules and guidelines contained in the Section 811 program's regulations, Notice of Funding Availability (NOFA) and other HUD guidance, including but not limited to eligibility, applicant selection, affirmatively furthering fair housing, and other requirements.

E. Mainstream Preference (Non-Elderly Disabled): The PHA has committed 50 vouchers for non-elderly disabled families that have been referred to the PHA by one of the identified partners to participate in a Mainstream supportive housing program. The household must include a non-elderly disabled person; the identification of this individual is not limited to Head of Household.

1. Applicants for Mainstream vouchers must be referred by one of the PHA's pre-qualified identified partners.
2. The referring partner must certify that the individual/family is either:
 - i. Currently in institutional or segregated settings, and want to move to community settings; or
 - ii. At risk of becoming institutionalized; or
 - iii. Currently homeless, or at risk of becoming homeless.
3. There are no required unit sizes of Vouchers or households for this program. A Voucher will be issued based on the PHA subsidy standards and individual needs of the family.
4. These households are allowed to port-out without the required year of residency.

F. Move-Up Preference: The PHA has committed up to 100 vouchers for families that have been referred to the PHA by the Ramsey County Continuum of Care. These individuals and families will be ready to transition or "move up" from Permanent Supportive Housing (PSH) units. These are families that were homeless prior to entry into the PSH program, and who continue to need a rental subsidy but no longer require intensive supportive services. Eligible families will have completed a supportive housing program within Ramsey County in good standing, and will receive a voucher to preserve their rental assistance.

1. Applicants for Move-Up Vouchers must be referred by the Ramsey County Continuum of Care.
2. The referring partner must certify:

- i. That the family has successfully completed the respective supportive housing program.
 - ii. That if the family will not be housed in their current subsidized unit, the family will receive assistance in placing their voucher upon initial voucher receipt.
 - iii. That, upon successful transfer to the Housing Choice Voucher program, the Permanent Supportive Housing program placement, previously occupied by the applicant family, will be filled by a homeless family in need of supportive services.
- 3. There are no required unit sizes of Vouchers or households for this program. A Voucher will be issued based on the PHA subsidy standards and individual needs of the family.
 - 4. The PHA will request referrals at their discretion, as vouchers are available.

APPENDIX I

REASONABLE ACCOMMODATION POLICY

I. OVERVIEW

This policy is intended to expand on the PHA's Equal Opportunity Housing Plan. It is not intended to and does not change or enlarge the PHA's duty under any law, regulation or ordinance. Where in conflict, the applicable law, regulation or ordinance shall prevail.

This policy is incorporated into and made a part of the PHA's Public Housing Admission and Occupancy Policies and its Section 8 Admission and Occupancy Policies and applies to the PHA's Public Housing Program and Section 8 Program.

II. NON-DISCRIMINATION

The PHA shall not discriminate against an applicant, public housing resident, Section 8 participant or other program recipient because of disability, race, color, creed, religion, national origin or ancestry, familial status, sex, sexual preference, sexual or affectional orientation, public assistance status, marital status, age, or political affiliation. The PHA shall not solely, on the basis of a disability, deny benefits to an otherwise qualified person. The PHA shall give a qualified person with a disability, through a requested reasonable accommodation, an equal opportunity to participate in and benefit from its housing, aid, benefit or service.

The PHA shall give a qualified person with a disability, through a reasonable accommodation, housing, aid, a benefit or a service that is equally effective as that provided to others. The term "equally effective" is not intended to produce an identical result or level of achievement as a person without a disability but is intended to give a person with a disability an equal opportunity to obtain the same result or level of achievement.

It is the PHA's policy to fully comply with all applicable federal, state and local laws and ordinances, including the United States Housing Act of 1937, as amended, Rehabilitation Act of 1973, § 504 (29 U.S.C. § 794), Americans with Disabilities Act, 42 U.S.C. § 2101, Fair Housing Act, 42 U.S.C. § 3601, Minnesota Human Rights Act, Minn. Stat. § 363 and St. Paul Human Rights Ordinance, St. Paul Legislative Code, Chapter 183. To the extent that anything herein conflicts with applicable federal, state and local laws and ordinances, those laws supersede this policy.

III. DEFINITIONS

A. A Person With A Disability Is One Who:

1. Has a physical or mental impairment that substantially limits one or more major life activities;
2. Has a record of such an impairment; or

3. Is regarded as having such an impairment.
Specifically excluded from the definition of a disability are any exclusions enumerated in any applicable federal, state or local laws or ordinance, including the laws cited in Section II.

B. Major Life Activity:

Includes but is not limited to caring for one's self, doing manual tasks, walking, seeing, hearing, speaking, breathing, learning and working.

C. Mental Impairment:

Includes but is not limited to mental retardation, organic brain syndrome, emotional or mental illness and specific learning disabilities.

D. Physical Impairment:

Includes but is not limited to cosmetic disfigurement, neurological, musculoskeletal, senses, respiratory, cardiovascular, reproductive, AIDS, HIV-positive, digestive, genito-urinary, hernic, lymphatic and skin.

E. A Qualified Person With A Disability:

Is one who meets the essential eligibility requirements and who can achieve the purpose of the program or activity with or without modifications.

F. Essential Eligibility Requirements:

Include: stated eligibility requirements like income; compliance with selection criteria; timely payment of financial obligations; care of premises; no disqualifying criminal or drug activities; respect for the rights of others; explicit or implicit requirements inherent to the program or activity; and compliance with all obligations of occupancy with or without supportive services provided by persons other than the PHA.

G. Reasonable Accommodation:

Reasonable accommodation includes a transfer, a physical or structural change to the home or housing complex, or an exception to the PHA's rules, policies or procedures. The requested accommodation must be linked to the disability. In general, the PHA will accept the judgment of the person with the disability that an accommodation is needed as a result of the disability. However, the PHA has the option to require the person with a disability to show the need for an accommodation.

The PHA may accept the judgment of the person with the disability that the specifically requested accommodation is the most appropriate. However, the

PHA may investigate alternatives to the requested accommodation and/or alternative methods of providing the requested accommodation if the PHA determines that the requested accommodation would be a financial and an administrative burden or a fundamental alteration of the program.

If more than one reasonable accommodation will satisfy the needs of the person with the disability, the PHA has the option to select the accommodation which is most convenient and cost effective for it. This includes the option to make an exception in procedure or policy or whether to make a physical or structural change.

The PHA shall make a reasonable accommodation for a physical or mental impairment of a qualified applicant or recipient that is otherwise eligible unless it can show that the accommodation would impose an undue financial and administrative burden or a fundamental change in the nature of the PHA's programs.

H. Exclusions:

A person with a disability may be excluded when a person's tenancy would pose a direct threat to others, the person's own health or safety, or would result in substantial physical damage to the property of others or if the person is not "otherwise qualified" for housing unless a reasonable accommodation would eliminate the direct threat.

I. Undue Hardship:

Means significant difficulty or expense.

IV. COMMUNICATION

The PHA shall make reasonable accommodations to communicate with applicants, public housing residents, Section 8 participants, other program recipients and members of the public. Reasonable accommodations may include using auxiliary aids such as interpreters for applicants, Braille materials, note takers or telecommunication devices for deaf persons. The PHA is not required to provide devices that are of a personal nature or that are prescribed or are otherwise for personal use or study.

The PHA shall give consideration to the accommodation requested by the individual with the disability.

The PHA is not required to provide an accommodation that would fundamentally change the nature of the program or activity or result in an undue financial and administrative burden.

V. APPLICATION PROCESS

During the application process, The PHA may ask all applicants the same questions. An

applicant is not required to talk about a disability but may be asked to verify a disability if the applicant asks for a reasonable accommodation. The PHA shall not assume that a person has a disability.

An applicant may refuse to explain negative information because it may reveal the existence, nature or severity of a disability. The applicant has the right not to talk about the disability. However, the PHA retains the right to deny admission because of the negative information.

If an applicant requests a reasonable accommodation, the applicant has the burden to show that the accommodation is likely to enable the applicant to comply with the lease and that the applicant will, for example, accept supportive services or attend a self-help group or rehabilitation program if the applicant's history warrants. The PHA may make it a condition of an applicant's admission to accept such services or attend a self-help group or rehabilitation program.

Although the PHA may not amend the lease or program to require the person to accept such services, it may deny admission if the rejection of the services may result in conduct that violates the lease or program rules. After admission, the PHA may not make it a condition of the tenancy that the tenant use the services or attend a program, but it may evict if the tenant violates the lease or it may otherwise terminate assistance for violation of program rules. For example, the PHA may not evict a tenant for not taking a medication, but may evict the tenant for conduct or behavior resulting in serious or repeated lease violations, regardless of the reason, including if such conduct or behavior is the result of not taking the medication.

In the Section 8 Project-Based Voucher Program, the tenant may be required to participate in supportive services as a fundamental condition of the project that they enter. Failure to continue with those services may result in termination of the project-based voucher for a failure to follow its terms.

VI. PHYSICAL ACCESSIBILITY

To the maximum extent practicable, the PHA's buildings will be physically accessible and usable by disabled persons where a physical accommodation is reasonable. A physical modification is reasonable if it does not cause an undue financial and administrative burden or fundamentally change the nature of the program. Since financial situations are not static, a cost base analysis should be done for each physical modification request.

Cost base factors include but are not limited to the type of modifications, cost, the size of the PHA's overall housing business, number of units, type of units, budget, expenses and ability to recoup the cost.

Alterations in new construction shall comply with federal and state law and regulations.

If a physical modification is an undue financial and administrative burden, the PHA may

provide for program access at a different accessible location, if it would not fundamentally change the nature of the program.

VII. ACCESSIBLE UNITS

The PHA will comply with accessibility standards as provided in all applicable laws and regulations.

VIII. ACCESSIBLE UNITS FOR HEARING AND SIGHT IMPAIRED

The PHA may modify units to reasonably accommodate residents with hearing or sight impairments when the modification does not create an undue financial and administrative burden or fundamentally alter the nature of the program or activity.

IX. ACCESSIBLE COMMON AREAS AND NON-DWELLING AREAS

It is the PHA's goal to achieve accessible common areas and non-dwelling areas as follows:

- A. Non-dwelling areas within a building which are not accessible will be modified to meet accessibility requirements when the building receives comprehensive modernization.
- B. Non-dwelling areas which are not accessible will be modified to meet accessibility requirements when the building undergoes comprehensive improvement.

X. TRANSFER TO A ACCESSIBLE UNIT

To satisfy a reasonable accommodation, a resident may transfer to an accessible unit in priority as follows:

- A. First, the unit shall be offered to a resident of another unit in the same project or comparable projects under common control.
- B. Second, the resident will be offered an accessible unit in any building, if available. If a unit is not available, the resident will be placed on a waiting list for a reasonable period of time.
- C. Third, the resident's existing unit may be modified to meet the needs of the resident, provided that the modifications do not create an undue financial and administrative burden or fundamentally alter the nature of the programs or activities.
- D. Fourth, the resident will be offered a Section 8 voucher

XI. DISABLED APPLICANTS ON THE WAITING LIST

A disabled applicant to the Public Housing Waiting List who is qualified and who needs an accessible unit, shall be offered a unit as follows:

- A. When the qualified applicant is at the top of the waiting list and an accessible unit is available and no disabled tenant in the building needs such a unit.
- B. If an accessible unit becomes available and the applicant at the top of the waiting list does not need an accessible unit and no tenant in the building needs such a unit, the unit will be offered to the next qualified applicant needing an accessible unit.
- C. If an accessible unit becomes available and no disabled applicant is on the waiting list, and no tenant in the building needs such a unit, the unit will be offered to the qualified applicant next on the waiting list. However, if the accessible unit is needed for an applicant or resident, the non-disabled resident in the unit shall vacate and move to another suitable and available unit.

XII. PROGRAM ACCESSIBILITY

The PHA will make reasonable accommodations for qualified persons with disabilities to have access and use its programs provided that the accommodation does not create an undue financial or administrative burden or fundamentally alter the nature of the program. Except when necessary to maintain the fundamental nature of the program, the PHA will not use eligibility criteria that adversely impact on disabled persons.

XIII. HOUSING VOUCHERS

When issuing a housing voucher to a family with a disabled person, the PHA shall provide access to a current listing of available units known to it, and, if necessary, otherwise assist the family in locating an available accessible dwelling unit. The PHA shall consider the special circumstances of a disabled applicant or participant in locating accessible housing when considering requests for extensions housing vouchers in accordance with the reasonable accommodation procedures provided above.

If necessary and otherwise in accordance with the reasonable accommodation procedures above, the PHA shall make an exception to fair market rents to allow a Section 8 voucher holder to rent a unit that is responsive to their medical needs.

XIV. A DISABLED PERSON'S COMPLIANCE WITH THE PHA'S RULES, POLICIES OR PROCEDURES

A reasonable accommodation may include an exception to the PHA's rules, policies and procedures. If an applicant or recipient can show that the failure to comply with a rule, policy or procedure was due to a disability, the participant may be eligible for a requested accommodation. This may include reinstating the person to a waiting list at an original spot or abandoning termination or eviction procedures. However, the accommodation

need not be approved if it imposes an undue financial and administrative hardship or fundamentally changes the nature of the program.

If an accommodation provided in the past has failed, the PHA is not required to offer the same accommodation unless the person can show new circumstances as to why the accommodation will likely work in the future.

An exception to the PHA's rules, procedures and policies does not require a lowering or a waiver of the essential requirements of a lease or program. If a tenant refuses services or another reasonable accommodation and conduct or behavior that violates the lease or program rules continues, the PHA may take the same action as it would with a person without a disability.

A disabled person may be required to show documentation of the disability and the need for the accommodation, if the disability and need are not obvious. If requested by the PHA and not proffered, the PHA need not offer an accommodation.

XVI. PROCEDURE TO REQUEST AN ACCOMMODATION IN THE HOUSING CHOICE VOUCHER PROGRAMS

The Public Housing Agency shall notify applicants and program participants of the PHA's Reasonable Accommodation practice. Every request shall be carefully considered by the PHA to ensure that it meets all the requirements stated in the PHA's Reasonable Accommodation Policy and all applicable laws and regulations.

In order to request an accommodation, the applicant or participant may put their request in writing if possible along with any supporting medical documentation, if applicable, and provide it to their Occupancy Technician. If the Occupancy Technician is unable to obtain a written request for the accommodation, he/she will take steps to memorialize it for recordkeeping purposes. The Occupancy Technician will then forward it onto the Programs Manager for consideration.

If granted, the family will be notified in writing that the accommodation has been granted, and when that accommodation will be effective.

If the requested accommodation is denied, the family will be notified in writing and may have the opportunity to provide additional information or medical documentation to support their request.

XVII. GRIEVANCES OR COMPLAINTS

Grievances or complaints of applicants for, or residents of, public housing or applicants for or participants in the Section 8 program shall be processed in accordance with the procedures adopted by the PHA in its Public Housing Admission and Occupancy Policies or its Section 8 Admission and Occupancy Policies, whichever is applicable.

Appendix J

Hardship Transfers

I. Overview

A hardship transfer includes families who are transferring from either the Public Housing or Section 8 Rental Assistance Program to the other program because it has been determined that their needs would be better met by the alternative program.

1. Section 8 participants may request a hardship transfer to Public Housing. The participant must, at the time of request and up to approval, be an active Section 8 participant. The request requires a \$15 non-refundable processing fee.
2. A hardship transfer is granted to alleviate an extreme hardship. Examples of a hardship transfer include, but are not limited to a move to;
 - a. Be closer to family members who assist with daily care;
 - b. Gain access to transportation; or
 - c. Be closer to daycare, employment, or medical care.
3. The hardship transfer request must be approved by the Rental Administrator.
4. Upon approval of the transfer request, the Section 8 participant must complete a public housing application and meet all public housing screening criteria before being allowed to move into a public housing unit.
5. A Section 8 participant who has requested and been approved for a transfer to public housing, and who has met all public housing screening criteria, will be assigned to a public housing unit according to the Public Housing Admission and Occupancy Policies. The Section 8 participant must give proper notice to their Section 8 landlord according to the terms of their lease.
6. Approved transfers from public housing to Section 8 will be issued a voucher immediately upon eligibility if the Section 8 utilization rate is below 100%. If the rate is at or above 100%, they will be issued a voucher on a one-for-one basis with applicants off the regular Section 8 waiting list.

APPENDIX K

SECTION 8 PROJECT-BASED VOUCHER (PBV) PROGRAM

I. OVERVIEW

A. Purpose of Program: The program goals for the Section 8 Project-Based Voucher (PBV) Program are:

1. To contribute to the upgrading and long-term viability of the area's housing stock.
2. To increase the supply of affordable housing and location choice for very low-income households.
3. To integrate housing and supportive services such as education, case management, job training, and day care to help families and individuals achieve stability and self-reliance.
4. To promote the coordination and leveraging of resources of public, semi-public, or non-profit agencies with compatible missions.
5. To support the City of St. Paul's affordable housing goals.
6. To assist the State of Minnesota and Ramsey County and the City of St. Paul with their plans to end homelessness, by providing rental subsidies to supportive housing and other projects that are designed to house persons experiencing homelessness.

B. Program Elements:

1. A PHA may attach up to 20 percent of units authorized by its consolidated ACC (Annual Contributions Contract) as PBV units. For units with a new HAP contract dated after April 18, 2017, a PHA may project-based up to an additional 10% of ACC authorized units, to provide units for homeless populations, for units providing supportive services for elderly residents and/or residents with disabilities, or for units located in a low-poverty census tract. (24 CFR §983.6; HUD Notice PIH 2017-21)
 - a. Homeless. For the purposes of this exception, "homeless" is defined as individuals and families who meet the definition of homeless under section 103 of the McKinney-Vento Homeless Assistance Act and contained in the Continuum of Care Interim Rule at 24 CFR § 578.3.
 - b. Veterans. The units are specifically made available to house families that are comprised of or include a veteran. A veteran is an individual who has served in the United States armed forces. For purposes of determining if the units are eligible for this exception, "veteran" includes an individual with an "other than dishonorable" discharge status who is ineligible for healthcare provided through the Veterans Health Administration.

- c. Supportive Services. The units provide supportive housing to persons with disabilities or to elderly persons. For the purposes of this exception, “supportive housing” includes a project that makes supportive services available for all of the assisted families in the project and provides a range of services tailored to the needs of the residents occupying such housing. Such services may include, but are not limited to, meal service adequate to meet nutritional need, housekeeping aid, personal assistance, transportation services, health-related services, case management, child care, educational and employment services, job training, counseling, or other services designed to help the recipient live in the community as independently as possible. Any of these services may be offered by a project for the unit to be considered as supportive housing. Any supportive service must be offered on at least a monthly basis; and the service(s) must be available for the duration of a family’s residence in the unit.
 - d. Low-Poverty Census Tract. For the purposes of this policy, “Low-Poverty Census Tract” is defined as one where the poverty rate is 20% or less, as defined by the most recent American Community Survey 5-Year Estimates. A project that qualifies for this exception at the time of HAP Contract Execution continues to qualify for the exception for the length of the contract, regardless of future changes in the poverty rate.
- 2. The units may be new construction, rehabilitated or existing units, as defined in the applicable federal regulations.
 - 3. For the purpose of this policy, a “project” may be a single building, multiple contiguous buildings, or multiple buildings on contiguous parcels of land.
 - 4. Not more than 25 percent of the units, or 25 units in any project, whichever is greater, may be assisted with PBV (the “project cap”).
 - a. That cap does not apply to units that are specifically made available for elderly families or families residing in housing where supportive services are available, as defined in this policy.
 - b. A property that is located in a low-poverty census tract (poverty rate 20% or lower) may have up to 40% of its units assisted with PBV, or 25 units in any building, whichever is greater.
 - 5. The location of PBV units must be consistent with the goals of deconcentrating poverty and expanding housing and economic opportunities.

C. Requirements for Participation:

- 1. Competitive Selection Process: To meet HUD’s requirement in 24 CFR §983.51 that PBVs be awarded through a competitive process, the PHA will offer PBVs only through Minnesota Housing’s annual Consolidated Request for Proposals (“SuperRFP”) process. Minnesota Housing will award other financial assistance through that process without any consideration that a project may receive PBV assistance.

2. Developer/Owner Proposal: To be considered for an award of PBVs from the PHA, a developer/owner must submit a proposal through Minnesota Housing's Consolidated Request for Proposals ("SuperRFP").
3. Projects Approved for or Denied Other Funding by Minnesota Housing:
 - a. The PHA will take no action on PBV requests submitted through the SuperRFP process until Minnesota Housing has made its funding awards.
 - b. When a property developer or owner submits an application under the SuperRFP requesting both PBVs and other forms of assistance, and Minnesota Housing does not approve any of the other assistance requested, then the PHA will not consider the request for PBVs.
 - c. If a project owner or developer submits an application through the SuperRFP that only requests PBVs, the PHA will consider that application after Minnesota Housing has made its funding awards.
4. Selection Criteria: If an application requesting PBVs has gone through Minnesota Housing's SuperRFP as indicated above, the PHA will review the application based on the following selection criteria. All proposed projects will be evaluated first under the General Criteria for All Projects (30 Points). The applicant will select which of the remaining four categories they wish to be evaluated under (70 Points), depending on what has been made available in the SuperRFP (Mixed Income, Supportive Housing for Homeless Persons, VASH or FUP).
 - a. General Criteria for All Projects (30 Points Maximum): All projects submitted for consideration will be evaluated under these two criteria.
 - i. Prior extensive experience of the applicant in developing and managing similar residential housing with project-based voucher subsidies and demonstrated ability and capacity of the applicant to proceed expeditiously with the proposal. 10 Points.
 - ii. Leveraging: Extent to which PBV voucher proposal is created in a project that has additional affordable housing beyond what is provided by the PBV units. 20 Points.
 - iii. Minimum Size: In order to be considered eligible for Project-Based Vouchers, any project must be applying for at least ten (10) units for Project-Based assistance, or the entire size of the project, whichever is less.
 - b. Mixed-Income Affordable Housing: Projects that are applying for Project-Based Vouchers with the intent of creating mixed-income or mixed-finance projects will be selected in accordance with the following additional criteria. (70 Point Maximum.)
 - i. A project that is New Construction at the time of application. 35 points

- ii. A project that is located in a low-poverty census tract, as defined in this policy. 35 points.
- c. Affordable Housing for the Elderly: Projects that are applying for PBV with the intent of creating affordable housing units specifically designed to house elderly families. (70 point Maximum.)
 - i. A project that is New Construction at the time of application. 30 points
 - ii. A project that is located in a low-poverty census tract, as defined in this policy. 30 points.
 - iii. Provide (or contract for) on-site supportive services appropriate for the population served. 10 points.
- d. Supportive Housing for the Homeless: Projects that are applying for Project-Based Vouchers with the intent of creating affordable housing options with supportive services on-site to assist homeless clients will be selected in accordance with the following additional criteria. (70 Point Maximum.)
 - i. Requirement for all of the following (45 points):
 - 1. Serve homeless individuals and families, as defined in Minnesota Housing's SuperRFP. 15 points.
 - 2. Provide (or contract for) on-site supportive services appropriate for population served. 15 points.
 - 3. Process referrals from Ramsey County's Coordinated Entry, in accordance with their processes. 15 points.
 - ii. Extra points for the following (25 Point Maximum):
 - 1. Projects where the PBV units will serve individuals and families who meet the definition of homeless under section (103 of the McKinney-Vento Homeless Assistance Act). 15 points.
 - 2. A project that is New Construction at the time of application. 10 points.
 - 3. A project that is located in a low-poverty census tract, as defined in this policy. 10 points.
- e. HUD-Veterans Affairs Supportive Housing (VASH): Projects that are applying for PBV with the intent of creating affordable housing units specifically designed to house veterans referred and served by the local VA Office will be selected in accordance with the following additional criteria. (70 Point Maximum.)
 - i. Requirement for all of the following (40 Points):

1. Obtain letter of support from local VA. 20 points.
 2. Accept referrals from VA to fill all vacancies. 10 points.
 3. Have supportive services available on-site, as approved and accepted by VA. 10 points.
- ii. Extra points for the following (30 Point Maximum):
1. A project that is New Construction at the time of application. 15 points.
 2. A project that is located in a low-poverty census tract, as defined in this policy. 15 points.
- f. Family Unification Program (FUP): Projects that are applying for PBV with the intent of creating affordable housing units specifically designed to house families referred by partnering agencies for Family Unification Program vouchers will be selected in accordance with the following additional criteria. (70 Point Maximum.)
- i. Requirement for all of the following (45 points):
1. Accept referrals from Ramsey County Child Protection to fill all PBV vacancies. 15 points.
 2. Obtain letter of support from Ramsey County Health and Human Services (partner/referring agency for Family FUP vouchers). 15 points.
 3. Provide (or contract for) on-site supportive services appropriate for population served. 15 points.
- ii. Extra points for the following (25 Point Maximum):
1. PBV units are all 3BR or larger. 15 points.
 2. A project that is New Construction at the time of application. 10 points.
 3. A project that is located in a low-poverty census tract, as defined in this policy. 10 points.
5. Before the PHA will provide voucher rent assistance, all developments must have PHA Board approval, HUD approval, meet Housing Quality Standards and have an executed Housing Assistance Payments Contract.
6. Before committing to offer more HCVs for PBV use, the PHA will consider the need for vouchers to renew or extend HAP contracts with existing PBV projects.

II. ELIGIBLE UNITS

A. Eligible Units:

1. All PBV selected sites must be in compliance with PBV goals, Civil Rights requirements and Housing Quality Standards. The PHA will review the applications to determine if the location is consistent with the goal of deconcentrating poverty and expanding housing and economic opportunities and must take into consideration the site selection standards listed in 24 CFR §983.57 and the PBV program goals.
2. To define a PBV unit as a unit in a rehabilitated housing, each unit must require a minimum of \$3,000 rehab costs.
3. For units requesting an exception to the 25 percent cap in a building, and that exception is based on providing supportive services, the services must be designed as services essential for maintaining or achieving independent living such as, but not limited to, counseling, education, job training, health care, mental health services, alcohol or other substance abuse services, child care services and or case management services. Prior to April 18, 2017, these services could be defined as being a participant in a PHA's FSS program.

B. Ineligible Units: The PHA may not attach PBV assistance for units if the following types of housing:

1. Shared housing
2. Units on the grounds of a penal, reformatory, medical, mental or similar public or private institution
3. Nursing homes or facilities providing continuous psychiatric medical, nursing service, board and care or intermediate care
4. Units that are owned or controlled by an educational institution and are designated for occupancy by students of the institution
5. Manufactured homes
6. Cooperative housing
7. Transitional housing
8. High rise elevator units for families with children
9. Owner occupied units
10. Units occupied by an ineligible family.
11. Units subsidized with any governmental rent subsidy or any governmental subsidy that covers all or any part of the operating costs of the housing. (24 CFR Sec. 983.54 (c)-(d))

III. APPLICANT ELIGIBILITY FOR PARTICIPATION

- A. An applicant for a PBV unit must meet the eligibility requirements for the tenant-based Section 8 Housing Choice Voucher (HCV) Program. (Note: VASH vouchers have different eligibility criteria.)
- B. Persons who will reside in PBV units may come from the PHA waiting list or be referred by the owner.
 - 1. For supportive housing PBV units, the PHA will accept applicant referrals to their waiting list from the supportive housing manager or administrator or partner agency (even when the regular HCV waiting list is closed). The referred applicant will be processed from the waiting list as a special admission to determine Section 8 eligibility.
 - 2. For vacancies in projects that are not allowed to process their own referrals, the PHA must provide applicants from its HCV waiting list when possible, and will survey its regular waiting list at the request of the project. If the PHA is unable to provide enough eligible applicants from its waiting list to fill the PBV units, the PHA may allow the owner to refer applicants to the PHA's waiting list (even when the regular HCV waiting list is closed). The referred applicant will be processed from the waiting list as a special admission to determine Section 8 eligibility.
- C. The PHA will not screen applicants for family behavior. This will remain the responsibility of the owner. The PHA will provide owners of PBV units the applicant's current and prior address (as shown on PHA records) and the name and address (if known) of the landlord at the family's current and any prior address. The PHA will inform the applicant that this information is being provided to the owner of the PBV unit.
- D. If the owner of a PBV unit denies a PBV applicant that has come from the PHA waiting list, that denial does not affect their place on the waiting list for tenant-based assistance.
- E. If an applicant from the PHA waiting list has been approved by the owner and is in verification status with the PHA and their name comes to the top of the waiting list to receive tenant-based assistance (TBA; that is, a Housing Choice Voucher/HCV), the applicant will be given the option to continue to be processed for the PBV unit or to be processed for a TBA voucher.

IV. LEASES AND HOUSING ASSISTANCE PAYMENTS CONTRACTS

- A. If the owner uses a standard lease form for rental to unassisted tenants, the lease for a voucher-assisted tenant must be in such standard form but it must be for a one-year initial term and it must include the HUD tenancy addendum. The lease must specify the name(s) of the owner(s) and the tenant, the address of the unit rented, the term of the lease including any provision for renewal, the amount of the tenant rent to owner, a listing of what services, maintenance, equipment and utilities to be provided by the owner and the amount of any charges that are for food, furniture or supportive services.

- B. The owner may refuse to renew the lease for good cause. If the owner refuses to renew the lease without good cause, the PHA will provide the family with a tenant-based voucher (when available), and the unit would be removed from the HAP contract.
- C. The initial term and any renewal terms of a PBV Housing Assistance Payments (HAP) contract between the owner and the PHA shall not exceed the limits established by federal law and regulations. The length of the initial term and any extensions will be negotiated with the owner and the form will be subject to any HUD-prescribed conditions at the time of the extension.
- D. An owner may request an increase to the rent for their PBV units at the annual anniversary of the HAP contract by a 60 day written notice to the PHA.
- E. The PHA will not include the vacancy loss clause in a new, renewing or extended PBV contract.
- F. If a PBV unit remains vacant for three months, the PHA will consider removing the unit from the Housing Assistance Payments Contract, thus permanently reducing the number of units under the contract in that project.

V. CONTINUED PARTICIPATION

- A. A family may choose to move out of a PBV unit with continued assistance any time after 12 months, except as stated in Section VII. Cost-Saving Measures, below.
- B. If a PBV tenant is determined no longer eligible for the Section 8 PBV program, they will be given a minimum of 30 days to vacate a unit. If the family does not vacate the unit, the PHA must remove that PBV unit from the HAP contract or substitute a similar unit in the building. A PBV tenant who is terminated from the PBV program will be given a minimum of a 30 day notice of the termination and must vacate the unit on or before the effective date of the termination.
- C. If the family receives no rent assistance because the family's income has reached a level where their TTP (Total Tenant Payment) is equal to or exceeds the gross rent for the unit, the family will be required to vacate the unit. If the family does not vacate the unit, the PHA must remove the unit from the HAP contract or substitute a similar unit in the same complex.
- D. If the PHA determines, at annual recertification, that the family is occupying a wrong size unit or determines at any time that the family is occupying a unit with accessibility features that the family does not require but another family does require, the PHA will offer continued assistance in the following order:
 - 1. An appropriate unit in another PBV unit either in the same building or another PBV assisted building.
 - 2. Tenant-based HCV assistance if the family has been a PBV participant for 12 months.

3. Other project-based assistance (public housing unit).

If the tenant accepts tenant-based assistance, the PHA will terminate the housing assistance payments for the wrong-sized unit or accessible unit at the expiration of the term of the family's voucher.

If the PHA offers option 1, 2 or 3 above and the family does not accept the offer, and does not move out of the unit within 60 days or any PHA approved extension, the PHA will terminate housing assistance payments for the wrong sized unit or accessible unit.

- E. For units with a HAP contract that originated before April 18, 2017, where a family resides in an excepted unit, that is a unit that provides FSS services or other supportive services and the family fails without good cause to complete its FSS contract or supportive services requirement, then the PHA will give the family a minimum of 30 days to vacate the unit. If the family does not vacate the unit, the PHA must remove that PBV unit from the HAP contract or substitute a similar unit in the building. A PBV tenant who is terminated from the PBV program will be given a minimum of a 30 day notice of the termination and must vacate the unit on or before the effective date of the termination.

For excepted units with a HAP contract that originated on/after April 18, 2017, the unit loses its excepted status if the family become ineligible for the supportive services during its tenancy, provided that (i) the family becomes ineligible for *all* supportive services available to the family, and (ii) the family becomes ineligible for reasons other than successfully completing the supportive services objective.

The PHA will monitor these required supportive services at least annually, by having the participant complete a supportive services survey form.

- F. If the tenant is absent from the unit for longer than 180 days, the PHA will terminate assistance to the unit. Provisions regarding substituting a similar unit in the same building apply or the PHA may amend the HAP contract to reduce the number of units assisted if the tenant has not vacated the unit.
- G. If a family occupying a PBV unit in the first 12 months of tenancy chooses to move to another PBV unit, they will be required to live in the new unit for 12 months before being eligible for a tenant-based voucher. If the family is asked to move to another unit because they over- or under-occupy their current unit or because the unit is needed by a family needing handicapped accessibility features, that family will still need to sign a 12 month lease on the new unit, but should they request and be granted a mutual lease termination by the owner, and providing that their cumulative time in a PBV unit has been 12 months or more, they will be given a Housing Choice Voucher.
- H. A PHA has discretion to mutually agree to add a unit to a contract for an existing project without competitive selection, in accordance with 24 CFR §983.207. The PHA will consider whether the unit was previously included in the project-based voucher contract, whether additional PBV will leverage the creation of affordable housing, and whether additional PBV

will be critical in ensuring the ongoing viability of the project. The PHA reserves the right to require that any project seeking to apply for additional vouchers in an existing project must apply through the process described in Section I. of this Appendix.

VI. RECORDS RETENTION

The “project file” for any new PBV project must contain the inspection reports demonstrating that every subsidized unit passed an HQS inspection before the PHA executed the Housing Assistance Payments contract with the property owner. The inspection reports must be retained in the project file throughout the duration of the contract and for at least three years thereafter.

The project file must also contain documentation that the required Subsidy Layering Review and Environmental Review were conducted and approved by HUD.

VII. COST SAVINGS MEASURES: See Part 6 Section XIII.

If voucher utilization or subsidy spending is anticipated to exceed authorized limits, the PHA may temporarily suspend issuing tenant-based vouchers to families moving out of PBV units. The PHA may also temporarily stop approving new families moving into vacant units in PBV projects.

APPENDIX L

LIMITED ENGLISH PROFICIENCY (LEP) PLAN

Approved by PHA Board of Commissioners April 27, 2005

I. PLAN STATEMENT

The Public Housing Agency of the City of Saint Paul (PHA) has adopted this plan to provide meaningful access to its programs and activities by persons with Limited English Proficiency (LEP). In accordance with federal guidelines the PHA will make reasonable efforts to provide or arrange free language assistance for its LEP clients, including applicants, recipients and/or persons eligible for public housing, Section 8/ Housing Choice Vouchers, homeownership and other PHA programs.

II. MEANINGFUL ACCESS; FOUR-FACTOR ANALYSIS

Meaningful access is free language assistance in accordance with federal guidelines. The PHA will periodically assess and update the following four-factor analysis, including but not limited to:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the PHA.
2. The frequency with which with LEP persons using a particular language come into contact with the PHA.
3. The nature and importance of the PHA program, activity or service to the person's life.
4. The PHA's resources and the cost of providing meaningful access. Reasonable steps may cease to be reasonable where the costs imposed substantially exceed the benefits.

III. LANGUAGE ASSISTANCE

1. A person who does not speak English as their primary language and who has a limited ability to read, write, speak or understand English may be a Limited English Proficient (LEP) person and may be entitled to language assistance with respect to PHA programs and activities.
2. Language assistance includes interpretation, which means oral or spoken transfer of a message from one language into another language; and/or translation, which means the written transfer of a message from one language into another language. The PHA will determine when interpretation and/or translation are needed and are reasonable.
3. PHA staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating in English. If a client asks for language assistance and the PHA determines that the client is an LEP person and that language assistance is necessary to provide meaningful access, the PHA will make reasonable efforts to provide free language assistance. If reasonably possible the PHA will provide the language assistance in the LEP client's preferred language.

The PHA has the discretion to determine whether language assistance is needed, and if so, the type of language assistance necessary to provide meaningful access.

The PHA will periodically assess client needs for language assistance based on requests for interpreters and/or translation, as well as the literacy skills of clients.

4. Translation of Documents

- a. The PHA will weigh the costs and benefits of translating documents for potential LEP groups, considering the expense of translating the documents, the barriers to meaningful translation or interpretation of technical housing information, the likelihood of frequent changes in documents, the existence of multiple dialects within a single language group, the apparent literacy rate in an LEP group and other relevant factors. The PHA will undertake this examination when an eligible LEP group constitutes 5 percent of an eligible client group (for example, 5 percent of households living in the PHA's public housing) or 1,000 persons, whichever is less.
- b. If the PHA determines that translation is necessary and appropriate, the PHA will translate the public housing lease and selected mailings and documents of vital importance into that language.
- c. As opportunities arise, the PHA may work with other housing authorities to share the costs of translating common documents, which may include language groups which do not (yet) reach the threshold level in the PHA's client population.
- d. HUD should provide prototype translations of standard housing documents in multiple languages in a timely fashion. HUD should provide this service to local housing authorities and the hundreds or thousands of other HUD grantees whose limited resources hinder their LEP efforts.
- e. The PHA will consider technological aids such as Internet-based translation services which may provide helpful, although perhaps not authoritative, translations of written materials.

5. Audiovisual Materials

- a. The PHA will use reasonable efforts to produce or obtain multiple translations of audiovisual materials it uses to inform or educate applicants, residents and other client groups. For example, the training video on housekeeping produced by PHA staff has four language options.
- b. The PHA will make such materials available for purchase by housing agencies and other organizations, to assist them in their LEP efforts.

6. Formal Interpreters

- a. When necessary to provide meaningful access for LEP clients, the PHA will provide qualified interpreters, including PHA bilingual staff and contract vendors. At important stages that require one-on-one contact, written translation and verbal interpretation services will be provided consistent with the four-factor analysis used earlier.
- b. The PHA may require a formal interpreter to certify to the following:
 - i. The interpreter understood the matter communicated and rendered a competent interpretation.
 - ii. The interpreter is covered by the Minnesota Government Data Practices Act and will not disclose non-public data without written authorization from the client.
- c. Formal interpreters shall be used at the following:
 - i. Formal hearing for denial of admission to public housing;
 - ii. Informal settlement conferences and formal hearing for termination of public housing;
 - iii. Hearings or conferences concerning denial or termination of Housing Choice Voucher (Section 8) participation.
- d. A PHA staff interpreter may not be a subordinate to the person making the decision.
- e. The PHA maintains a list of qualified, bilingual employees who have applied for, and tested for proficiency in languages used by clients. Those employees receive additional compensation for demonstrating non-English language proficiency and can provide limited assistance to PHA staff and LEP clients as part of their regular job duties.

7. Informal Interpreters

- a. Informal interpreters may include the family members, friends, legal guardians, service representatives or advocates of the LEP client. PHA staff will determine whether it is appropriate to rely on informal interpreters, depending upon the circumstances and subject matter of the communication. However in many circumstances, informal interpreters, especially children, are not competent to provide quality and accurate interpretations. There may be issues of confidentiality, competency or conflict of interest.
- b. An LEP person may use an informal interpreter of their own choosing and at their expense, either in place of or as a supplement to the free language assistance offered

by the PHA. If possible, the PHA should accommodate an LEP client's request to use an informal interpreter in place of a formal interpreter.

- c. If an LEP client prefers an informal interpreter, after the PHA has offered free interpreter services, the informal interpreter may interpret. In these cases the client and interpreter should sign a waiver of free interpreter services.
- d. If an LEP client wants to use their own informal interpreter, the PHA reserves the right to also have a formal interpreter present.

8. Outside Resources

- a. Outside resources may include community volunteers, PHA residents or Housing Choice Voucher/Section 8 participants.
- b. Outside resources may be used for interpreting services at public or informal meetings or events if a timely request has been made.
- c. The PHA maintains relationships with mutual assistance associations (MAA's) and other organizations that assist specific cultural and ethnic groups living in St. Paul. To help their clients obtain or keep housing assistance through the PHA, these organizations may provide qualified interpreters for LEP persons.

VI. MONITORING

- 1. The PHA will review and revise this LEP Plan from time to time. The review will include:
- 2. Reports from the PHA's computer business systems on the number of PHA clients who are LEP, to the extent that the software and staff data entry can provide such information. Such reports may be supplemented by staff observations.
- 3. Reports from the computer business systems and other sources listing the languages used by LEP clients.
- 4. A determination as to whether 5 percent or 1,000 persons from a PHA client group speak a specific language, which triggers consideration of document translation needs as described above.
- 5. Analysis of staff requests for contract interpreters: number of requests, languages requested, costs, etc.
- 6. The Resident Advisory Board (RAB) will be asked to review the LEP Plan annually as part of updating the Agency Plan.

VII. LEP PLAN DISTRIBUTION AND TRAINING

The LEP Plan will be:

1. Distributed to all PHA supervisors.
2. Available in PHA Management Offices and the Rental Office/Section 8 Office.
3. Posted on PHA's website, www.stpaulpha.org
4. Explained in orientation and training sessions for supervisors and other staff who need to communicate with LEP clients.

APPENDIX M

POLICY ON PROTECTIONS FOR VICTIMS OF DOMESTIC VIOLENCE

(“VAWA POLICY”)

Approved by PHA Board of Commissioners: April 25, 2007;
Emergency Transfer Policy Addition Approved September 27, 2017

I. Purpose

The Public Housing Agency of the City of Saint Paul (PHA) has adopted this policy in compliance with the “Violence Against Women and Justice Department Reauthorization Act of 2005” (“VAWA” or “the Act”, P.L. 109-162) and the Violence Against Women Reauthorization Act of 2013 (Pub. L. No. 113-4, 127 Stat. 54 (March 7, 2013)) and 24 C.F.R. §5.2007. VAWA is a federal law that provides protections for victims of domestic violence, dating violence and stalking. The PHA will comply with all applicable provisions of VAWA. This summary of VAWA protections is not intended to limit the rights of victims provided by the Act.

The PHA notes and supports the statements of Congressional purpose set forth in VAWA including those listed below (paraphrased from the statute).

The purpose of this subtitle (Title VI, Housing Opportunities and Safety for Battered Women and Children) is to

- Reduce domestic violence, dating violence, sexual assault and stalking; and protect victims of such criminal acts;
- Prevent homelessness caused by domestic violence;
- Create long-term housing solutions for victims of domestic violence;
- Build collaborations among victim service providers, homeless service providers, housing providers and housing agencies to address the housing needs of victims of domestic violence; and
- Enable public and assisted housing agencies, private landlords, private management companies and other housing providers and agencies to respond appropriately to domestic violence, while maintaining a safe environment for all housing residents.

II. Protection of Victims

- A. For the purpose of this policy, the term “domestic violence” encompasses acts or threats of domestic violence, dating violence, sexual assault and stalking, as those terms are defined in VAWA.
- B. VAWA protects qualified applicants or tenants and family members of applicants or tenants who are victims of domestic violence, dating violence, or stalking from being denied, evicted or terminated from housing assistance based solely on acts of domestic violence against them. An incident or incidents of actual or threatened domestic

violence, dating violence, stalking or criminal activity directly related to domestic violence, dating violence, or stalking shall not be considered “good cause,” or “serious or repeated lease violations” by the victim or by the immediate family member of the tenant who is the victim, that is grounds for termination of the lease or housing assistance.

- C. VAWA protections are available to both applicants for and recipients of housing assistance through the Public Housing program and Section 8 rent assistance programs, including tenant-based Housing Choice Vouchers (HCV) and Project-Based Vouchers (PBV).
- D. VAWA protects both women and men who are victims of domestic violence.
- E. The protections provided by VAWA and this policy are to be observed and enforced by all PHA staff, individuals and agencies contracting with the PHA, and property owners participating in the Section 8 Housing Choice Voucher or Project-Based Voucher programs.
- F. VAWA does not limit the authority of the PHA or a property owner or manager, when notified, to honor court orders addressing rights of access to or control of the property, including civil protection orders issued to protect the victim and issued to address the distribution or possession of property among the household members in cases where a family breaks up.

III. Certification

- A. PHA May Request Certification. If an applicant, public housing resident or voucher participant claims protection under VAWA against denial of an application, termination of tenancy or assistance, or other adverse action, the PHA may require the person who claims the VAWA protections to deliver a signed certification or other documentation concerning the incident or incidents. If the person does not deliver this certification within the time allowed, he or she will lose the legal protections under VAWA.
- B. Acceptable Forms of Certification. There are three ways to comply with a certification request by the PHA:
 - i. Complete a certification form approved by HUD (Form HUD-50066 or other approved form);
 - ii. Provide a police report or court record;
 - iii. Provide a document signed by an employee, agent, or volunteer of a victim service provider, an attorney, or a medical professional, from whom the victim has sought assistance in addressing the domestic violence, dating violence or stalking.
- C. Self-Certification; Request for Additional Information. The PHA may accept self-certification by the person claiming to be a victim within the protection of VAWA. If

the PHA has reason to believe the information provided in the certification is inaccurate or incomplete in material respects, the PHA may request additional information, also certified or attested.

- D. **Perjury.** The certification must state that the victim and any other person signing it or providing documentation are doing so under penalty of perjury (28 U.S.C. 1746).
- E. **Time limit.** The applicant, public housing resident or voucher participant must deliver the certification in one of these three ways within 14 business days after receiving the housing authority's request for certification.

IV. Confidentiality

Information provided by an applicant, resident or participant about an incident or incidents of domestic violence, dating violence or stalking involving that person or a member of the household will be held by the PHA in confidence and not shared without the consent of the person who provided the information, except that this information may be disclosed in an eviction proceeding or otherwise as necessary to meet the requirements of law.

- V. **Notices.** The PHA will provide notices explaining the VAWA protections to applicants for housing assistance (both Section 8 Housing Choice Vouchers and Public Housing), to public housing residents and Section 8 voucher participants, and to property owners participating in the voucher program.
- VI. **Leases; Bifurcation of Leases:** As required by VAWA, the public housing lease and the Section 8 lease addendum shall provide that the PHA or a property owner may bifurcate a lease to remove a household member who engages in criminal acts of physical violence against family members or others.

The PHA will revise the public housing lease to include provisions required by VAWA. For the interim period before the new lease can be signed by all tenants, the PHA will provide a lease addendum applicable to all leases. In the Section 8 HCV and PBV programs the PHA will require a new lease addendum, provided by HUD.

VII. Rights of PHA and Property Owners to Evict or Terminate Assistance

- A. **Eviction for reasons other than domestic violence.** VAWA specifically preserves the rights of the PHA and property owners to deny or terminate housing assistance to a victim of domestic violence for reasons other than the criminal activity related to the domestic violence, provided that no higher standard is applied.
- B. **Failure to Submit Certification After Request by PHA.** If the person claiming to be a victim within the protection of VAWA fails to deliver the certification or other documentation within 14 business days after receiving the PHA's request, that person loses the legal protections under VAWA.

- C. **Imminent and Actual Threat.** VAWA specifically preserves the rights of the PHA and property owners to evict or terminate from assistance any tenant or household member if the PHA or the owner or manager can demonstrate an actual and imminent threat to other tenants or those employed at or providing service to the property if that tenant is not evicted or terminated from assistance.

VIII. POLICY DISTRIBUTION AND TRAINING

This Policy will be included in the Admission and Occupancy Policies for the Public Housing Program as Appendix K and in the Admission and Occupancy Policies for the Section 8 Housing Choice Voucher Program as Appendix M. It will also be

1. Distributed to all PHA supervisors.
2. Available in PHA Management Offices and the Rental Office/Section 8 Office.
3. Posted on PHA's website, www.stpaulpha.org

Explained in orientation and training sessions for supervisors and other staff who have regular contact with applicants, public housing residents or Section 8 voucher participants.

IX. Emergency Transfer Policy

The PHA is concerned about the safety of its participants, and such concern extends to participants who are victims of domestic violence, dating violence, sexual assault, or stalking. In accordance with the Violence Against Women Act (VAWA), the PHA allows participants who are victims of domestic violence, dating violence, sexual assault, or stalking to request an emergency transfer from the participant's current unit to another unit. The ability to request a transfer is available regardless of sex, gender identity, or sexual orientation. The ability of the PHA to honor such request for participants currently receiving assistance, however, may depend upon a preliminary determination that the participant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, and on whether the PHA is able to facilitate a participant's chosen transfer to another dwelling unit that is available and safe to offer the participant for occupancy.

A. Eligibility for Emergency Transfer

A participant who is a victim of domestic violence, dating violence, sexual assault, or stalking, as provided in HUD's regulations at 24 CFR part 5, subpart L, is eligible for an emergency transfer if the participant reasonably believes that there is a threat of imminent harm from further violence if the participant remains within the same unit. If the participant is a victim of sexual assault, the participant may also be eligible to

transfer if the sexual assault occurred on the premises within the 90-calendar- day period preceding a request for an emergency transfer.

A participant requesting an emergency transfer must expressly request the transfer in accordance with the procedures described in this section. Participants may request an emergency transfer if they meet the eligibility requirements in this section.

B. Requesting an Emergency Transfer.

To request an emergency transfer, the participant shall notify the PHA's HCV Program Management Office in writing. The PHA will provide reasonable accommodations to this policy for individuals with disabilities. The participant's request for an emergency transfer should include either:

1. A statement expressing that the participant reasonably believes there is a threat of imminent harm from further violence if the participant were to remain in the same dwelling unit assisted under the PHA's program; OR
2. A statement that the participant was a sexual assault victim and that the sexual assault occurred on the premises during the 90-calendar-day period preceding the participant's request for an emergency transfer.

C. Confidentiality.

The PHA will keep confidential any information that the participant submits in requesting an emergency transfer, and information about the emergency transfer, unless the participant gives the PHA written permission to release the information on a time-limited basis, or disclosure of the information is required by law or required for use in an eviction proceeding or hearing regarding termination of assistance from the covered program. This includes keeping confidential the new location of the dwelling unit of the participant, if one is provided, from the person or persons that committed an act of domestic violence, dating violence, sexual assault, or stalking against the participant. See the Notice of Occupancy Rights under the Violence against Women Act for All Tenants for more information about the PHA's responsibility to maintain the confidentiality of information related to incidents of domestic violence, dating violence, sexual assault, or stalking.

D. Emergency Transfer Timing and Availability.

The PHA cannot guarantee that a transfer request will be approved or how long it will take to process a transfer request. The PHA will, however, act as quickly as possible to move a participant who is a victim of domestic violence, dating violence, sexual assault, or stalking to another unit, subject to availability and safety of a unit. If a participant reasonably believes a proposed transfer would not be safe, the participant may request a transfer to a different unit. If a unit is available, the transferred participant must agree to abide by the terms and conditions that govern occupancy in

the unit to which the participant has been transferred. The PHA may be unable to transfer a participant to a particular unit if the participant has not or cannot establish eligibility for that unit. If the participant who needs an emergency transfer is unable to identify any safe and available units for which she or he is eligible, the PHA will assist the participant in identifying other housing providers who may have safe and available units to which the participant could move. At the participant's request, the PHA will also assist participants by providing contact information for local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, or stalking.

E. Emergency Transfers: Housing Choice Voucher (HCV) Program.

Tenant-based assistance: If a participant in the tenant-based HCV program requests an emergency transfer as described in this plan, the PHA will expedite the administrative processes required to move using their existing voucher assistance. The PHA will make exceptions to program regulations restricting moves as required and as permitted by law. At the participant's request, the PHA will refer them to organizations that may be able to further assist the participant.

F. Emergency Transfers: Project-Based Voucher (PBV) Program.

Project-based assistance: Participants assisted under the project-based voucher (PBV) program may request an emergency transfer under the following programs for which a new application would not be required:

- Project-based assistance in the same project (if a vacant unit is available, determined to be safe, and subject to the approval of the project owner);
- Tenant-based voucher, if available, and if the PBV participant has lived in the unit for more than one year. (Emergency transfers under VAWA will take priority over other waiting list issuances for these types of assistance.)

At the victim's request, the PHA will refer the victim to organizations that may be able to further assist the victim. For example, PBV participants may also request emergency transfer under the following programs for which they are required to apply:

- Public housing program (if a vacant unit is available);
- PBV assistance in another development (if a vacant unit is available);

Emergency transfers will not take priority over waiting list admissions for these programs.

G. Safety and Security of Participants.

Pending processing of the transfer and the actual transfer, if it is approved and occurs, the participant is urged to take all reasonable precautions to be safe.

- Participants who are or have been victims of domestic violence are encouraged to contact the National Domestic Violence Hotline at 1-800-799-7233, or a local domestic violence shelter, for assistance in creating a safety plan.
- For persons with hearing impairments, that hotline can be accessed by calling 1-800-787-3224 (TTY).
- Participants who have been victims of sexual assault may call the Rape, Abuse, and Incest National Network's National Sexual Assault Hotline at 1-800-656-HOPE, or visit the online hotline at <https://ohl.rainn.org/online/>.
- Participants who are or have been victims of stalking seeking help may visit the National Center for Victims of Crime's Stalking Resource Center at <https://www.victimsofcrime.org/our-programs/stalking-resource-center>.
- Participants who fear for their safety and need assistance keeping their home address confidential from their abusers may contact the Safe at Home program administered by the Office of the Minnesota Secretary of State. More information about the Safe at Home program can be found at <http://www.sos.state.mn.us/safe-at-home/about-safe-at-home/>

APPENDIX N

STUDENTS' ELIGIBILITY FOR VOUCHERS

Approved by PHA Board of Commissioners: June 27, 2007
Amended March 25, 2009

I. OVERVIEW

A. STUDENT ELIGIBILITY; PARENTS' INCOME CONSIDERED

Federal law and regulations limit the eligibility of an adult student under age 24 for Section 8 Housing Choice Vouchers or Project-Based Voucher (PBV) assistance, based on the financial situation of the student's parent(s). The restrictions apply to a student at an institution of higher learning (that is, beyond high school) who is living on his or her own in a Section 8-assisted unit or applying for Section 8 assistance. The restrictions do not apply to students living with their parents in a Section 8-assisted unit or to students who live with parents who are themselves applying to receive Section 8 assistance.

In general, a student under age 24 may be eligible for Section 8 assistance if the student is:

1. Financially independent from his or her parents; or
2. A veteran of the U.S. military; or
3. Married, or
4. A person with disabilities who was receiving Section 8 assistance as of November 30, 2005; or
5. Has dependent children.

If the student does not meet one or more of those exceptions, the student will only be eligible for Section 8 assistance if the student's parents' income is within the Section 8 income limits. The student's own income must also be within the Section 8 income limits.

B. STUDENT FINANCIAL AID

Student financial assistance (scholarships or grants, but not loans) that exceeds actual tuition costs will be included in annual income when determining the student's eligibility for Section 8 assistance. That amount also will be considered for rent calculation purposes unless the student is over the age of 23 and has dependent children. (The HUD regulations say "over the age of 23" in this context, and "under age 24" in others.)

II. REQUIREMENTS FOR STUDENTS TO ESTABLISH ELIGIBILITY

A. FINANCIAL INDEPENDENCE

Unless the PHA determines that the student is financially independent from his or her parents, the eligibility of a student seeking Section 8 assistance will be based on both the student and the parents being determined income-eligible for Section 8 assistance.

If the student can demonstrate that his or her parents are absent and not providing financial support, or that the student is independent from his or her parents, the PHA will not examine the income of the parent or parents. The determination of financial independence may include, but is not limited, to the following factors:

1. The student must be at least 18 years old.
2. Separate household:
 - a. The individual must have established a household separate from his or her parents or legal guardians for at least one year prior to application for occupancy; or
 - b. The individual must meet one or more of the requirements in the U.S. Department of Education's definition of an "independent student": Age 24, veteran, married, graduate or professional student, or have legal dependents other than a spouse (for example, dependent children or an elderly dependent parent); or
 - c. The individual must be a person with disabilities who was receiving Section 8 assistance as of November 30, 2005.
3. The individual must not be claimed as a dependent by parents or legal guardians pursuant to IRS regulations.
4. The individual must obtain a certification of the amount of financial assistance that will be provided by parents, signed by the individual providing the support. This certification is required even if no assistance will be provided. The PHA may accept a certification from another knowledgeable source or waive this requirement if the student demonstrates that his or her parents cannot be reached or that they cannot provide such a statement in a timely manner.

B. PARENTS' INCOME

1. If the student is not determined to be financially independent from his or her parents, both the income of the parents and of the student must be considered to determine if the student is financially eligible for Section 8 assistance. Both the student's income and the parents' income must be separately assessed for income eligibility. That is,

- the student must be financially eligible on his or her own, including in annual income any support received from parents and student financial assistance in excess of tuition costs. The parents must also be eligible financially as if they were applying for Section 8 as a family.
2. If the parent resides in another jurisdiction, the income limits for the area where the parent resides apply. HUD's "Low-Income" limit (80% of area median income) is the income eligibility standard for both the student and the parent(s).
 3. The parent's eligibility for Section 8 must be reviewed annually, at the time of the student's annual recertification of eligibility.
 4. Parent's certification:
 - a. The PHA will require the student to provide a certification of income from each of the student's parents and their individual declarations of the amount of support they are each providing to the student, under penalty of perjury.
 - b. If the student has been living with one parent and has not had contact with or does not know where to contact his or her other parent, the PHA will require the student to provide a certification, under penalty of perjury, addressing the circumstances, including a statement that the student has not received financial assistance from the parent. The parent with whom the student has been living must provide a declaration of support they provide to the student and a certification of their income.
 - c. The PHA retains the right to require the parent(s) to provide supporting documentation such as tax returns, pay stubs, etc. at any time that the declaration, certification and eligibility are in question.
 5. The PHA may waive the requirement that the parent(s) provide a declaration and certification, for good cause and to prevent undue hardship for the student. The basis for the waiver shall be documented and retained.

C STUDENT FINANCIAL AID

1. If the student receives financial assistance (scholarships or grants, but not loans) that are more than his or her tuition costs, the excess amount will be included in annual income when determining the student's eligibility for Section 8 assistance. That amount also will be considered for rent calculation purposes unless the student is over the age of 23 and has dependent children.
2. Again, this provision does not apply to a student who lives with his or her parents in a Section 8-assisted unit, or who lives with parents who are themselves applying for Section 8 assistance.

3. Student financial assistance includes amounts earned under federal Work-Study (FWS) programs, to the extent that the student's financial assistance from all sources exceeds their actual tuition costs.

III. SPECIAL SITUATIONS

A. TWO OR MORE STUDENTS LIVING TOGETHER

If two or more students under age 24 apply for or are receiving Section 8 rent assistance, their eligibility must be determined both individually and as a household. Each student's independence from or support from his or her parents, and his or her parents' financial eligibility for Section 8 must be examined separately also.

B. ONE HOUSEHOLD MEMBER INELIGIBLE

If one or more students living in a household with two or more student members is ineligible for Section 8 based on their parent's financial ineligibility or their failure to comply with this requirement, the entire student household is ineligible for Section 8 assistance. If the student household chooses to remove the ineligible student from the household (that is, the ineligible student moves out), the remaining eligible students may receive assistance. Section 8 voucher assistance may not be pro-rated to a household consisting of eligible and ineligible student members.

LEGAL AUTHORITY: Fiscal Year 2006 appropriations for HUD were enacted in Title III of Public Law 109-115 (119 Stat. 2936) on November 30, 2005 (the Act). Section 327 of the administrative provisions of the Act (1) introduced new restrictions on housing assistance that may be provided to students of higher education under section 8 of the United States Housing Act of 1937 (42 U.S.C. 1437f) (1937 Act), and (2) directed HUD to issue a final rule no later than 30 days following enactment of the Act. In accordance with this statutory direction, HUD published a final rule implementing section 327 of the Act on December 30, 2005 (70 FR 77742), and this rule became effective on January 30, 2006. HUD published further guidance on April 10, 2006 (71 FR 18146). The latter notice stated that HUD would post additional guidance on its Internet website. HUD provided a list of "Frequently Asked Questions" (FAQ's) dated May 2, 2006.

HUD's rules related to student eligibility for Section 8 are published at

24 CFR Sec. 5.609 Annual income.

24 CFR Sec. 5.612 Restrictions on assistance to students enrolled in an institution of higher education.

24 CFR Sec. 982.201 Eligibility and targeting.

24 CFR Sec. 982.552 PHA Denial or termination of assistance for family.

HUD's Notice PIH 2005-16 (HA), issued June 15, 2006 (expired June 30, 2006 and not renewed) also provides "Policy Guidance on College Student Admissions" to public housing agencies.

In compliance with HUD appropriations acts for FFY 2006-2008, HUD published a final rule in the Federal Register on August 21, 2008 (p. 49332) "to include the exemption for persons with disabilities

who were receiving Section 8 assistance as of November 30, 2005.” A “person with disabilities” is defined in Section 3(b)(3)(E) of the Housing Act of 1937.

<p style="text-align: center;">APPENDIX O CODE OF CONDUCT/CONFLICT OF INTEREST POLICIES</p>

The PHA's Conflict of Interest Policies for Commissioners and Staff are incorporated by reference into this document (Admission & Occupancy Policies for the Section 8 Housing Choice Voucher Program, also known as the Administrative Plan for the Section 8 Program).

The PHA's Conflict of Interest Policy for Commissioners was approved by the Board of Commissioners on December 15, 1993 and last amended on March 19, 1997. The PHA's Conflict of Interest Policy for Staff was approved by the Board of Commissioners on May 19, 1993 and last amended on March 28, 2007.

Section 8 Admission & Occupancy Policies

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SECTION 8 ADMISSION & OCCUPANCY POLICIES

PART TWO: APPLICANT SELECTION

I. Overview:

- | | |
|---|---|
| <p>A. Selecting Applicants: Applicants will be selected from the waiting list. Their place on the waiting list will be determined by two factors:</p> <ol style="list-style-type: none"> 1. Preference factors, and; 2. Date and time of application. | <p><u>Refer to:</u>
24 CFR
§982.204(a)</p> |
| <p>B. Single Waiting List: A single waiting list will be maintained for Vouchers.</p> | <p>§982.204(f)</p> |
| <p>C. Income Limits: All applicants initially selected for Section 8 Rental Assistance must have annual income anticipated for the next twelve months that is at or below the current income limit set for Very Low Income families. This income limit is based upon 50% of the median income for the area.</p> <p>In addition, not less than 75 percent of the families admitted to the Section 8 Program shall be targeted to families whose income does not exceed 30% of the median income for the area (Extremely Low Income).</p> <p>HUD may authorize Section 8 Rent Assistance for specific uses. Under these circumstances, assistance could be provided to families with low incomes, with annual income between 51-80% of median income for the area. Refer to Part One, Table 1-1 for current income limits.</p> | <p>§982.201(b)</p> <p>§982.201(b)(2)</p> |
| <p>D. Special Allocations: When HUD awards Section 8 funds for a specific category of applicants, the PHA will assist these households in accordance with HUD's special instructions.</p> | <p>§982.203
§982.204(e)</p> |

II. Definitions of Preferences and Related Terms

- | | |
|---|---------------------------------|
| <p>Local preferences are used in selecting applicants for Section 8 Assistance. The St. Paul PHA has established five local preferences. These local preferences are as follows:</p> <ol style="list-style-type: none"> 1. Residency Preference: This preference is given to applicants whose head of household or spouse: <ol style="list-style-type: none"> a. Lives in Saint Paul; | <p>§982.207</p> <p>§982.207</p> |
|---|---------------------------------|

- b. Works in or has been notified that they have been hired to work in Saint Paul; or
 - c. Attends school or has been accepted to attend school in Saint Paul; or
 - d. Has been deemed as “homeless” through Ramsey County’s Coordinated Entry System.
- 2. **Veteran’s or Service Person Preference:** This preference is given to an applicant where any member of the household is a Veteran or a Service Person.
 - a. **“Veteran”** means any person who has served under the direction of the Armed Forces and clandestine forces of the United States.
 - b. A **“Service Person”** is part of an applicant’s family and is in the military forces of the United States at the time of application for housing. “Military forces” means the Army, Navy, Air Force, Marine Corps, Coast Guard and the commissioned corps of the U.S. Public Health Service.
- 3. **Preservation Preference:** This preference is given to current residents of a building approved by HUD for preservation or replacement vouchers.
- 4. **Project-Based Voucher (PBV) or Project-Based Assistance (PBA) Supportive Housing Preference:** This preference is given to applicants who have been approved to participate in a PHA PBV or PBA supportive housing program.
- 5. **Mainstream Preference:** This preference is given to applicants who have been approved to participate in a Mainstream Non-Elderly Disabled supportive housing program. The PHA receives referrals from pre-qualified partners for these 50 vouchers.
- 6. **Special Programs Preference:** This preference is given to applicants who have been approved to participate in a program for which the PHA has received a special allocation of vouchers; for example, Family Unification Program (FUP), Veterans Administration – Supportive Housing (VASH), etc.
- 7. **Move-Up Preference:** This preference is given to applicants who have been approved by the Ramsey County Continuum

SECTION 8 ADMISSION & OCCUPANCY POLICIES

of Care to transition from Permanent Supportive Housing (PSH) to a Housing Choice Voucher. The PHA will request referrals from the Ramsey County Continuum of Care, and will limit this preference to a maximum of 100 vouchers.

III. General Policies Regarding Preferences

A. Use of Preferences:

1. **PBV Supportive Housing Preference:** Applicants who qualify for the PBV Supportive Housing Preference will receive 20 preference points.
2. **Preservation Preference:** Applicants who qualify for the Preservation Preference will receive 20 preference points.
3. **Special Programs Preference:** Applicants who qualify for the Special Programs Preference will receive 20 preference points.
4. **Mainstream Preference:** Applicants who qualify for the Mainstream Preference will receive 20 preference points.
5. **Move-Up Preference:** Applicants who qualify for the Move-Up Preference will receive 20 preference points.
6. **Residency Preference:** Applicants who qualify for a Residency Preference will receive four preference points. This includes those families who qualify as homeless, per the Coordinated Entry guidelines.
7. **Veteran's Preference:** Applicants who qualify for a Veteran's Preference will receive two preference points.
8. Applicants with **no preferences** are given the lowest priority for assistance. They will be housed according to the date and time of their application.

B. Denial of Preferences: No preference of any kind will be given to an applicant if any member of the applicant's family was evicted during the past three years from housing assisted under the 1937 Housing Act Program because of drug-related criminal activity, except that the PHA may give an admission preference if the PHA determines that the evicted person:

§982.553

1. Has successfully completed a rehabilitation program approved by the PHA;
2. Clearly did not participate in or know about the drug-related criminal activity, or;
3. No longer participates in any drug-related criminal activity.

C. Changes in Preference Status: Occasionally families on the waiting list who did not qualify for a preference at the time they applied for rental assistance will experience a change in circumstances that now qualifies them for a preference. In such instances:

1. It is the family's responsibility to contact the PHA.
2. Families certifying that they now qualify for a preference will be repositioned on the waiting list in accordance with their new preferences and their date and time of application.

IV. Offering Assistance

When an applicant's name rises to the top of the list in accordance with PHA policies, they will be offered the next available Voucher. If funds are not sufficient to house the family at the top of the waiting list in accordance with the PHA subsidy standards, no additional Vouchers will be issued until sufficient funds are available to cover the cost of the family's assistance. §982.204

A. When the PHA selects a family to participate in the Section 8 Program, the PHA must give the family an oral briefing. The briefing must include information on the following subjects: §982.301

1. A description of how the program works;
2. Family and owner responsibilities; and
3. Where the family may lease a unit, including renting a unit inside or outside the PHA's jurisdiction.

B. For a family that qualifies to lease a unit outside the PHA's jurisdiction under portability, the briefing must include an explanation of how portability works.

C. If the family is currently living in a high poverty census tract in the PHA's jurisdiction, the briefing must explain the advantages of moving to an area that does not have a high concentration of families living in poverty.

D. In a briefing that includes any disabled person, the PHA must take appropriate steps to ensure effective communication.

E. The PHA provides briefings to individuals or groups.

- F.** Spoken word and American Sign Language interpreters are available as needed. The PHA will inform applicants that interpreters must be requested prior to the scheduled meeting.
- G.** Family members, representatives, and service providers who assist families with special needs are encouraged to attend briefings.
- I. Information Packet:** An information packet will be handed out to the family at the briefing. It includes information on the following subjects: §982.301(b)

 - 1. The term of the Voucher (*how long the family has to locate a suitable unit to rent*), and the PHA policy on any extensions or suspensions of the term. The packet must explain how the family can request an extension.
 - 2. How the PHA calculates the housing assistance payment for a family including;

 - a. How the PHA determines the payment standard for a family;
 - b. How the PHA determines the Total Tenant Payment for a family;
 - c. Information on the Payment Standards and the PHA Utility Allowance Schedule, and the 40% affordability restriction.
 - 3. How the PHA determines the maximum rent for an assisted unit;
 - 4. What the family should consider in deciding whether to lease a unit, including:

 - a. The condition of a unit;
 - b. Whether the rent is reasonable;
 - c. The cost of any tenant-paid utilities and whether the unit is energy-efficient; and
 - d. The location of the unit, including proximity to public transportation, centers of employment, schools and shopping;

5. Where the family may lease a unit. For a family that qualifies to lease a unit outside the PHA jurisdiction under portability procedures, the information packet must include an explanation of how portability works;
6. The HUD-required “tenancy addendum.” The tenancy addendum is language that must be included in the lease;
7. The Request for Tenancy Approval Form, and an explanation of how to request PHA approval to lease a unit;
8. A statement of the PHA policy on providing information about a family to prospective owners;
9. PHA Subsidy Standards (how many persons can live in each size unit), including when the Housing Authority will consider granting exceptions to the standards;
10. The HUD brochure on how to select a unit;
11. The HUD brochure on lead-based paint;
12. Information on federal, state and local equal opportunity laws, and a copy of the HUD Housing Discrimination Complaint form;
13. A list of landlords or other parties known to the PHA who may be willing to lease a unit to the family, or help the family find a unit;
14. Notice that if the family includes a person with disabilities, the family may request a current listing of accessible units known to the PHA that may be available;
15. Family obligations under the program;
16. The grounds on which the PHA may terminate assistance for a participant family because of family action or failure to act; and
17. PHA informal hearing and review procedures: This information will describe when the PHA is required to give a participant family the opportunity for an informal review, and how to request a review.
18. A notice about the Violence Against Women and Justice Department Reauthorization Act of 2005 (“VAWA”), that protects qualified applicants and tenants and family members of qualified applicants and tenants who are victims of

domestic violence, dating violence, or stalking from being evicted or terminated from housing assistance based solely on acts of such violence against them.

V. Monies Owed To A Housing Authority

The following policies apply to any monies owed to the PHA or another Housing Authority by current and former Public Housing residents and Section 8 participants.

§982.552(c)(v)

The PHA utilizes HUD's online EIV system to determine whether an applicant owes money to another housing authority. The PHA also reports information through EIV about debts owed to this agency by former public housing residents and participants in the Section 8 Housing Choice Voucher Program.

- A. Debt to Saint Paul PHA:** When an applicant owes money to this PHA from previous Public Housing residency or Section 8 participation, the PHA may, at their sole discretion, either deny the application, or require the applicant to repay that amount in full, or require the applicant to enter into a Payment Agreement before being admitted.
1. To be eligible to enter into a Payment Agreement, the applicant must first demonstrate to the satisfaction of the PHA that they cannot pay the debt in full at the time of application.
 2. Payment Agreements require a **minimum payment of \$25 a month** on each claim for monies owed until the balance owed is paid in full.
 3. The repayment agreement shall require payment in full of the balance owing within twelve months, absent extraordinary circumstances.
- B. Debt to Another Housing Authority.** When an applicant owes money to another housing authority from previous public housing residency or Section 8 participation, the applicant will not be admitted without providing proof that the debt has been repaid in full, or the applicant has entered into a Payment Agreement with the other housing authority and is current on the payments.
- C. Consequences of Default:** Section 8 assistance may be denied or terminated if a family does not comply with the terms of a Payment Agreement. In addition, if the family is no longer assisted by Section 8, the balance owing may be submitted for recovery to the State Department of Revenue – Revenue Recapture Program. Names that have been submitted to the Revenue Recapture Program will be withdrawn if a former tenant

is readmitted to the Section 8 Program and a new Payment Agreement is executed.

VI. Time Frame To Find A Suitable Unit

- A. Initial Issuance:** Applicants who are issued a Voucher have a period of 60 days (*called the initial term*) in which to locate a suitable unit and notify the PHA of their intent to enter into a lease with an owner. §982.303
- B. Extensions of Term:**
1. A voucher holder who cannot find a suitable unit within 60 days after a Voucher is issued, but who intends to continue to look for one, must request in writing an extension from the PHA before the voucher has expired. The PHA will grant a family one 30-day extension unless the PHA has suspended voucher issuances due to current or projected overutilization of vouchers. §982.303(b)
 2. An additional 30-day extension may be granted to a participant family that needs and request more time as a reasonable accommodation for a family member who is person with a disability, or if the family wishes to use their voucher outside of St. Paul and receiving housing agency has asked the PHA to extend the voucher. The request must be made before the family's voucher has expired.
- C. Suspension of Term:** The PHA will grant a family a suspension of the Voucher term if the family has submitted a Request for Tenancy Approval during the term of the Voucher. A suspension means that the PHA will "stop the clock" on the term of the Voucher from the time when the family submits a Request for Tenancy Approval to lease a unit, until the time when the PHA approves or denies the request. §982.303(c)

VII. Public Housing Residents Requesting Section 8 Assistance

- A. Residents with Special Housing Needs:** Residents of Public Housing are permitted to request a transfer to the Section 8 Program even when the Section 8 waiting list is closed to new applicants. They will be required to apply for a transfer in accordance with PHA policies on transfers. If their request is approved, the resident's name will be placed on a Section 8 Transfer Waiting List according to the date of the transfer approval. As Vouchers become available, these families will receive the next available form of assistance in rotation with

applicants from the Section 8 Program waiting list who are currently not receiving any form of rental assistance.

VIII. Non-Discrimination In Applicant Selection

- A. No Discrimination:** The PHA will not discriminate against any applicant for public housing due to race, color, religion, creed, national origin or ancestry, sex, age, handicap, disability, receipt of public assistance, marital status, sexual or affectional orientation, or political or other affiliation.
- B. No Preferential Treatment:** No preference will be given to an applicant because of political affiliation or his or her acquaintance with any public official at the federal, state or local level.

§982.202(b)
Minn. Stat.
§363A.09, Subd 1
(1)-(2)
St. Paul Leg.
Code (SPLC),
Chapter 183

IX. Applicants Ineligible For A Preference

When an applicant has claimed a preference in their application, and the information provided by the applicant shows that the necessary criteria cannot be met, the PHA shall do the following:

- A.** Promptly notify the applicant in writing of the determination and briefly state the reasons they are ineligible for the preference. The notification will offer the applicant an opportunity to meet with a PHA-designated representative to review the determination. The request to discuss the determination must be made in writing within 10 days of the date of the notification letter.
- B.** The PHA-designated representative may be an officer or employee, including the staff person who made or reviewed the determination.

X. Misrepresentation

Any material misrepresentation on the part of an applicant revealed through the application process or otherwise, may result in a determination of ineligibility. The applicant shall be notified in writing of such determination by the PHA, and will be given the opportunity for an informal review of the matter.

Written Policies on Homeless Admission Preferences with PHAs.

Metropolitan Council HRA policy:

- “Move Up” from Permanent Supportive Housing (2 points)

The PHA will partner with the Hennepin, Ramsey and Suburban Metro Area Continuum of Care (CoC) to identify individuals and families ready to transition or “move up” from Permanent Supportive Housing (PSH) units. These are families that were homeless prior to entry into the PSH program and who continue to need a rental subsidy but no longer require intensive supportive services.

- The PHA will accept referrals from the CoC’s Coordinated Entry Program. Move-Up applicants will be identified by PSH based on Move-Up eligibility criteria:
 - A minimum of two years living in Permanent Supportive Housing
 - Ongoing source of income
 - Paid rent on-time and in full every month for at least ten of the past twelve months or are in compliance with the Housing Supports program.
 - Connected to mainstream or community resources
- The PHA will allocate up to 40 Housing Choice Vouchers per calendar year toward the Move-Up Preference. Once these vouchers have been utilized in a calendar year, no additional priority will be given under this category.

[←](#) [→](#) headinghomeramsey.org/provider-resources

Content Structure Configuration Help

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Provider Resources

✓ Collapsed Content FY 2022 HUD CoC NOFO Links and Documents has been updated.

View Edit Revisions

FY 2022 HUD CoC NOFO Links and Documents

The FY2022 Notice of Funding Opportunity (NOFO) has been released as of August 1, 2022 and closes on September 30, 2022. Projects that make the selection list will advance to the federal application process. Applicants are responsible for the preparation of the eventual electronic submission of their project application (in e-snaps) if the project is approved locally for funding. Those who are new project applicants must register with e-snaps, the electronic Continuum of Care (CoC) Program Application and Grants Management System that HUD's Office of Special Needs Assistance Programs (SNAPS) uses to support the CoC Program funding application and grant awards process for the CoC Program. To register and learn more about e-snaps, please [click here](#).

HHR has officially opened the Letter of Intent (LOI) process as of August 11th. Any renewal CoC funded projects and/or new domestic violence (DV) bonus funded projects can apply through the annual Continuum of Care (CoC) Program Notice of Funding Opportunity (NOFO). New DV project applicants do not have to be a victim-service provider, but must serve DV victims as outlined in the [HUD CoC Program NOFO](#). Both renewal project applicants and new DV Bonus project applicants must complete a pre-application survey and also save (but not submit) their e-snaps application by 4pm on Thursday, August 25th. Interested project applicants should attend the informational meeting via zoom on Tuesday, August 18th from 9am to 10:30am. The informational meeting will be broken up into four sections: review of FY2022 CoC Program NOFO, Ramsey CoC Priorities, Ramsey CoC Timeline, and New DV Bonus program models/eligibility. All renewal project applicants are highly encouraged to attend the first hour as well.

*Link to pre-application can be found here: [2022 CoC Annual NOFO Pre-App for Renewal and New DV Bonus Projects](#).

Service providers across all of Ramsey County are invited to the 2022 CoC Annual NOFO Pre-App for Renewal project applicants and new DV Bonus project applicants must complete a pre-application survey and also save (but not submit) their e-snaps application by 4pm on Thursday, August 25th. Interested project applicants should attend the informational meeting via zoom on Tuesday, August 18th from 9am to 10:30am. The informational meeting will be broken up into four sections: review of FY2022 CoC Program NOFO, Ramsey CoC Priorities, Ramsey CoC Timeline, and New DV Bonus program models/eligibility. All renewal project applicants are highly encouraged to attend the first hour as well.

*Link to pre-application can be found here: [2022 CoC Annual NOFO Pre-App for Renewal and New DV Bonus Projects](#).

*Link to recorded Informational Meeting: <https://zoom.us/j/630184947?pwd=QlRlNDZkdjBldDdHODdsUWtEafdaF>

Password: XShshWGWS

*Link to HHR FY2022 CoC NOFO Folder: [Click Here](#)

Attachment	Size
8.16.2022_FY2022_Ramsey_CoC_NOFO_Overview_&_Process_FINAL.pdf	425.65 KB

[Edit this item](#)

► FY 2022 HUD CoC Special (Unsheltered) NOFO Documents and Links

► FY 2021 HUD CoC NOFO Links and Documents

10:40 AM
8/16/2022

10:41 AM
8/16/2022

MN-501 Collaborative App. Attachment 1E-2a

View results

Respondent

16

Anonymous

04:37

Time to complete

1. Renewal Agencies ONLY * - Name of Agency per the Grant Inventory Worksheet (GIW).

Amherst H. Wilder Foundation

2. Renewal Agencies ONLY * - Name of project per the GIW

ROOF Project Wilder Renewal FY23

3. New DV Bonus Agencies ONLY * - Name of Agency

4. Primary Contact Name *

Lindsay Bacher

[More options for Responses](#)

5. Primary Contact Email *

lindsay.bacher@wilder.org

6. Primary Contact Phone *

651-280-2380

7. Secondary Contact Name *

Janayah Bagurusi

8. Secondary Contact Email *

9. Secondary Contact Phone *

10. Project Component *

☐ Permanent Supportive Housing (PSH)☐ Rapid Re-Housing (RRH)☐ Transitional Housing (TH)☐ New DV Agencies ONLY - Transitional Housing/Rapid Re-Housing (TH-RRH)☐ Coordinated Entry System (CES)☐ Lead HMIS Agency Only - Homeless Management Information System (HMIS)

11. Proposed Project Start Date (Start data must be within calendar year 2023) *



12. Proposed Project End Date (Must be 12 months from the proposed project start date) *



13. Amount of Funding Requested *

14. Target Population(s) – check all populations this project intends to target. *☐ Youth (24 and under)☐ Single Adults (25 or older)☐ Families (one adult 18 or older with a dependent child or children)☐ Domestic Violence or Trafficking Survivors

15. New DV Agencies ONLY – Please provide a description of your new project that includes the scope of services and alignment with HUD's 2022 Annual NOFO Policy Priorities. (Word Count Range: Min. 300 and Max. 500 words)

16. Domestic Violence (only complete if targeting DV survivors)

Number of Beds

17. Domestic Violence (only complete if targeting DV survivors)

Number of Units

18. Single Adults

Number of Beds

19. Single Adults

Number of Units

20. Families

Number of Beds

21. Families

Number of Units

22. Youth (only complete if targeting youth)

Number of Beds

23. Youth (only complete if targeting youth)

Number of Units

24. Coordinated Entry Assessment and Referral

The applicant does NOT agree to participate in the Coordinated Entry Assessment and Referral process.

The applicant agrees to participate in Coordinated Entry Assessment and Referral process.

25. Homeless Management Information System (HMIS)

Renewal Projects - Please provide the name and number of HMIS provider used for the project per the GIW.

144, AHW-RRH-RCC-HUD-CoC-ROOF Wilder

26. Homeless Management Information System (HMIS) continued

Applicant does NOT utilize HMIS but agrees to use HMIS if funded.

Applicant does Not utilize HMIS and does not intend to if funded. (Please note, this will affect your eligibility if not a VAWA funded agency.

27. Continuum of Care Participation, check all that apply.

The applicant agrees to regularly attend CoC meetings and participate on a committee or workgroup.

The applicant agency agrees to provide project-level data to the CoC by: participating in the Point-in-Time Count; submitting program reports to the CoC; participating in CoC planning and gap analysis, and needs assessment; submitting required LAS, HIC, Pulse, and GIW reports by CoC deadlines; and giving the Local System Administrator administrative access to all your programs in the HIC or providing necessary waiver request to the CoC and submitting data in a timely manner.

The applicant does not agree to regularly attend CoC meetings or participate in committees or workgroups.

28. Services (TH, PSH, RRH, and TH-PH-RRH combined Applicants ONLY), please select all that apply.

Applicant assures that case managers will systematically assist and support clients in completing applications for mainstream benefits.

Applicant assures that transportation assistance is provided to clients to attend mainstream benefit appointments, employment training, or job when appropriate.

Homeless assistance providers use a single application form for four or more mainstream programs.

Applicant agrees that all referrals will come through Coordinated Entry and meet one of four of HUD's homeless definitions.

29. HUD has placed emphasis on assessing how the best practice of Housing First is operationalized by homeless service providers during this years NOFO. Below is the Housing First Checklist for TH, PSH, RRH, and TH-PH-RRH combined Applicants ONLY. If your agency follows the principles of Housing First, please select all that apply.

Are applicants for housing allowed to enter the program without income?

Are applicants for housing allowed to enter the program even if they aren't "clean and sober" or "treatment compliant"?

Are applicants for housing allowed to enter the program even if they have criminal justice system involvement?

Are service and treatment plans voluntary, so that tenants cannot be evicted for not following through?

30. Applicant incorporates other known best practices into the projects policies and practices (TH, PSH, RRH, and TH-PH-RRH combined Applicants ONLY), please select all that apply.

Harm Reduction

Client-Centered Engagement

Trauma Informed Care

Culturally specific services'

31. Chronic Homeless Preference (PSH Projects ONLY)

Applicant agrees to give preference to the chronic homeless population when filling vacant units.

Applicant does NOT agree to give preference to the chronic homeless population when filling vacant unit.

32. Project Quality Thresholds (PSH and RRH Applicants Only), please check all that apply.

Type, scale, and location fit needs of participants.

Type, scale and location of supportive services fits needs and transportation for participants.

Participants are given individual and specific assistance to obtain mainstream benefits.

Applicant has assessed that project is needed in geographic location.

Participants helped to obtain and remain in PH.

Participants are assisted to both increase income and live independently using mainstream housing and services.

Applicant agrees that all referrals will come through Coordinated Entry and meet one of four of HUD's homeless definitions.

Services and housing is accessible to amenities (grocery, pharmacies, etc.).

Program/activities will be administered in most integrated setting appropriate for persons with disabilities. Persons with disabilities interact with person w/out disabilities.

Applicant has the history/capacity to complete timely and accurate drawdowns, performance reports.

Coordination with Health Care Providers**33. Does your agency currently coordinate with health care providers (i.e., clinics, hospitals, other non-profits that provide medical care)? ***

Yes

No - (Skip to question #36)

Unsure - (Skip to question #36)

34. If you answered "yes" to questions #33, do you have a formal memorandum of understanding with the health care provider?*

Yes - please submit your formal memorandum of understanding with your NOFO application. - (Skip to question #36)

No

Unsure - (Skip to question #36)

35. **If you answered "no" to question #34, would you be able to obtain a letter of commitment to either begin or continue your partnership with a health care provider for this new project that you could submit with your NOFO application?** * *

Yes - please submit your letter of commitment from the health care provider(s) with your NOFO application

No

Unsure

Coordination with the Public Housing Authority or other Housing Providers

36. **Does your agency currently coordinate with the Public Housing Authority (PHA) or other housing providers (including private landlords)?** *

Yes

No - (Skip to question #39)

Unsure - (Skip to question #39)

37. **If you answered "yes" to question #36, do you have a formal memorandum of understanding with the PHA or housing provider?** * *

Yes - please submit your formal memorandum of understanding with your NOFO application. - (Skip to question #39)

No

Unsure - (Skip to question #39)

38. **If you answered "no" to question #37, would you be able to obtain a letter of commitment to either begin or continue your partnership with the PHA or other housing providers for this new project that you could submit with your NOFO application?** *

Yes - please submit your letter of commitment from the PHA or housing provider(s) with your NOFO application.

No

Unsure

Culturally Competent Services and Racial Equity Implementation

39. Our organization conducts/provides cultural competency or racial equity training for all staff at least every three (3) years.

Yes

No

Unsure

40. Date of last cultural competency or racial equity staff training.

8/23/2022



41. Our organization has staff that is reflective of the demographics (race, ethnicity, age, gender) of target population being served by the project.

Yes

No

Unsure

42. Describe how the project adequately identifies specific culturally-based needs of target population(s) served. (Word Count Range: 200- 300 words)

First, we identify cultural needs of the populations we serve by hiring staff from those cultures and backgrounds. Sixty-six percent of Wilder housing participants identify as Black or African-American, and 50% of our staff identify as Black or African American. In the Family Supportive Housing Services leadership team, 50% identify as women of color. Some of our housing staff speak multiple languages, and where appropriate, we contract with translation services to make sure families can communicate in their most familiar language.

Second, we incorporate family voice into our program planning. Families voice their opinions through our annual survey, conversations with case managers, and our consumer group. We have had the consumer group on hiatus during COVID but plan to reactivate it soon. Wilder's strategic priority is to implement a Whole Family Approach framework to our services, and in FY23, Engaging Family Voice is the framework building block we are focusing on. We are hosting focus groups for families to engage them, build trust, and gather feedback on our services and programs. These will be done by end of calendar year 2022. In our most recent survey, 91% of families reported they agreed that Wilder staff respected their family's cultural and ethnic background.

43. Describe how the project modifies services and support the cultural needs of target population(s). (Word Count Range: 200- 300 words)

Wilder case managers take a culturally-responsive approach where appropriate, and focus on developing positive functioning of families by fostering their social/emotional well-being, confidence, competence, and cultural consciousness. Our program model honors cultural identity as an asset and a resource for people in their path to health and well-being, with the most common background represented as African-American/Black. Services that families receive are designed to nurture and sustain cultural identity through dignity and respect for everyone involved. Our staff are also empowered to embrace their own cultural identity in their process with families, and experience the reciprocal benefits of that work with the families they serve. Additionally, we use translators where necessary, or if possible, connect a family with a case manager who speaks their primary language. We've also worked to translate our forms into languages other than English, including Spanish, Hmong, Karen, and Somali.

Wilder is working to create an environment that is safe and inclusive of LGBTQ employees and program participants. Wilder has reviewed existing forms, care plans, and other materials to ensure they are appropriate for LGBTQIAP2+ participants and align with best practice recommendations. Additionally, we've just converted all of our restroom signage to be gender inclusive to make the building safer and more welcoming for people who identify as trans, non-binary, or both. At intake, participants and their children are asked for their gender without assumption, and staff respect gender pronouns. Staff in our housing programs help LGBTQIAP2+ participants navigate any needed services in an affirming manner.

44. Describe how your organization implements or plans to implement racial equity at the agency-level (i.e., cultural competency training, staffing, and working knowledge that is reflective of the population(s) served). (Word Count Range: 200- 300 words)

Wilder is committed to being a diverse, inclusive and equitable organization in the roles of a service provider, an employer, an economic entity and a community participant. We use the Intercultural Development Inventory (IDI) as a tool to measure intercultural competency and to set annual goals for staff development and training on intercultural skills and knowledge. In FY22, our org goal was to Elevate and strengthen Wilder Inclusion, Diversity, and Equity (WIDE) efforts by increasing use of IDI tools across the organization. We met our FY22 goals of having 80% of staff complete the IDI assessment, along with three levels of debrief: organization, division, and individual. In FY23, our org goals will continue to use the IDI to increase awareness of the work we need to do within our organization. Some of the identified racial equity work we are doing in FY23 include assessing holiday and PTO policies to decenter whiteness and dominant culture, and doing an historical reckoning of how Amherst Wilder made his wealth and what actions we need to take as an organization to reconcile that history with our anti-racism and equity values. Additionally, we offer WIDE Council meetings as a space for staff to come together to learn and discuss different topics around diverse identities and experiences, as well as employee resource groups around employees of African descent, Asian affinity group, Allies Against Racism, GLBTQ+ affinity group, and others as needed.

Match Information

Please review the following examples for Sources of Contributions and Written Commitments listed below to answer the question at the bottom of the page.

Sources of Contributions:

- Community Development Block Grant (CDBG)
- United Way
- Fannie May
- Federal Home Loan Bank
- Local or State general revenue funds
- Mainstream housing programs
- Social service programs

Written Commitments:

- Must be documented on letterhead stationery
- Signed by an authorized representative
- Dated
- It needs to be provided at the time the grant is awarded by HUD

The match letter must contain the following

- Name of organization providing the contribution.
- Type of contribution and value of the contribution (i.e., minimum of 25% of total HUD grant amount).
- Name of the project and sponsor organization to which the contribution will be given.
- Date that the contribution will be available.

Written commitments are required for all project applicants. Commitment letters must be provided upon HUD's grant agreement execution.

WARNING: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).

45. Please enter the percentage of cash match

25

46. Please enter the total cash match

161,803

47. Please list the source(s) of match

United Way, Wilder annual fund or endowment

48. Please enter the agencies Dun & Bradstreet (DUNS) number

077624401

49. Please enter your Agency System for Award Management (SAM) number.

TMVEMEJWEAS

50. Name of Agency Approved Signatory

Lindsay Bacher

51. Title of Agency Approved Signatory

Director of Program Development

52. Date

8/22/2022



53. **Signature**

Lindsay Bacher

Before Starting the Project Application

To ensure that the Project Application is completed accurately, ALL project applicants should review the following information BEFORE beginning the application.

Things to Remember:

- Additional training resources can be found on the HUD.gov at https://www.hud.gov/program_offices/comm_planning/coc.
- Questions regarding the FY 2022 CoC Program Competition process must be submitted to CoCNOFO@hud.gov.
- Questions related to e-snaps functionality (e.g., password lockout, access to user's application account, updating Applicant Profile) must be submitted to e-snaps@hud.gov.
- Project applicants are required to have a Unique Entity Identifier (UEI) number and an active registration in the Central Contractor Registration (CCR)/System for Award Management (SAM) in order to apply for funding under the Fiscal Year (FY) 2022 Continuum of Care (CoC) Program Competition. For more information see FY 2022 CoC Program Competition NOFO.
- To ensure that applications are considered for funding, applicants should read all sections of the FY 2022 CoC Program NOFO.
- Detailed instructions can be found on the left menu within e-snaps. They contain more comprehensive instructions and so should be used in tandem with navigational guides, which are also found on the HUD Exchange.
- Before starting the project application, all project applicants must complete or update (as applicable) the Project Applicant Profile in e-snaps, particularly the Authorized Representative and Alternate Representative forms as HUD uses this information to contact you if additional information is required (e.g., allowable technical deficiency).
- Carefully review each question in the Project Application. Questions from previous competitions may have been changed or removed, or new questions may have been added, and information previously submitted may or may not be relevant. Data from the FY 2021 Project Application will be imported into the FY 2022 Project Application; however, applicants will be required to review all fields for accuracy and to update information that may have been adjusted through the post award process or a grant agreement amendment. Data entered in the post award and amendment forms in e-snaps will not be imported into the project application.
- Rental assistance projects can only request the number of units and unit size as approved in the final HUD-approved Grant Inventory Worksheet (GIW).
- Transitional housing, permanent supportive housing with leasing, rapid re-housing, supportive services only, renewing safe havens, and HMIS can only request the Annual Renewal Amount (ARA) that appears on the CoC's HUD-approved GIW. If the ARA is reduced through the CoC's reallocation process, the final project funding request must reflect the reduced amount listed on the CoC's reallocation forms.
- HUD reserves the right to reduce or reject any renewal project that fails to adhere to 24 CFR part 578 and the application requirements set forth in the FY 2022 CoC Program Competition NOFA.

1A. SF-424 Application Type

1. Type of Submission: Application

2. Type of Application: Renewal Project Application

If "Revision", select appropriate letter(s):

If "Other", specify:

3. Date Received: 08/26/2022

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier: MN0048

This is the first 6 digits of the Grant Number, known as the PIN, that will also be indicated on Screen 3A Project Detail. This number must match the first 6 digits of the grant number on the HUD approved Grant Inventory Worksheet (GIW).

Check to confirm that the Federal Award Identifier has been updated to reflect the most recently awarded grant number

X

6. Date Received by State:

7. State Application Identifier:

1B. SF-424 Legal Applicant

8. Applicant

a. Legal Name: Amherst H. Wilder Foundation
b. Employer/Taxpayer Identification Number (EIN/TIN): 41-0693889
c. Unique Entity Identifier: TMVEMEJYWEA5

d. Address

Street 1: 451 Lexington Pkwy N
Street 2:
City: Saint Paul
County: Ramsey
State: Minnesota
Country: United States
Zip / Postal Code: 55104-4636

e. Organizational Unit (optional)

Department Name: ROOF Project
Division Name: Family Supportive Housing Services

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

Prefix: Ms.
First Name: Lindsay
Middle Name:
Last Name: Bacher
Suffix:
Title: Director of Program Development
Organizational Affiliation: Amherst H. Wilder Foundation
Telephone Number: (651) 280-2380
Extension:

Applicant: Amherst H. Wilder Foundation
Project: ROOF Project Wilder Renewal FY24

077624401
197785

Fax Number: (651) 280-3380

Email: lindsay.bacher@wilder.org

1C. SF-424 Application Details

9. Type of Applicant: M. Nonprofit with 501C3 IRS Status

10. Name of Federal Agency: Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Title: CoC Program

CFDA Number: 14.267

12. Funding Opportunity Number: FR-6500-N-25

Title: Continuum of Care Homeless Assistance
Competition

13. Competition Identification Number:

Title:

1D. SF-424 Congressional District(s)

14. Area(s) affected by the project (State(s) only): Minnesota
(for multiple selections hold CTRL key)

15. Descriptive Title of Applicant's Project: ROOF Project Wilder Renewal FY24

16. Congressional District(s):

a. Applicant: MN-004, MN-005
(for multiple selections hold CTRL key)

b. Project: MN-004
(for multiple selections hold CTRL key)

17. Proposed Project

a. Start Date: 07/01/2023

b. End Date: 06/30/2024

18. Estimated Funding (\$)

a. Federal:

b. Applicant:

c. State:

d. Local:

e. Other:

f. Program Income:

g. Total:

1E. SF-424 Compliance

19. Is the Application Subject to Review By State Executive Order 12372 Process? b. Program is subject to E.O. 12372 but has not been selected by the State for review.

If "YES", enter the date this application was made available to the State for review:

20. Is the Applicant delinquent on any Federal debt? No

If "YES," provide an explanation:

1F. SF-424 Declaration

By signing and submitting this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete, and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)

I AGREE: ☒

21. Authorized Representative

Prefix: Mr.

First Name: Armando

Middle Name:

Last Name: Camacho

Suffix:

Title: CEO

Telephone Number: (651) 280-2450
(Format: 123-456-7890)

Fax Number: (651) 280-3450
(Format: 123-456-7890)

Email: Armando.camacho@wilder.org

Signature of Authorized Representative: Considered signed upon submission in e-snaps.

Date Signed: 08/26/2022

1G. HUD 2880

Applicant/Recipient Disclosure/Update Report - form HUD-2880
U.S. Department of Housing and Urban Development
OMB Approval No. 2506-0214 (exp.02/28/2022)

Applicant/Recipient Information

1. Applicant/Recipient Name, Address, and Phone

Agency Legal Name: Amherst H. Wilder Foundation

Prefix: Mr.

First Name: Armando

Middle Name:

Last Name: Camacho

Suffix:

Title: CEO

Organizational Affiliation: Amherst H. Wilder Foundation

Telephone Number: (651) 280-2450

Extension:

Email: Armando.camacho@wilder.org

City: Saint Paul

County: Ramsey

State: Minnesota

Country: United States

Zip/Postal Code: 55104-4636

2. Employer ID Number (EIN): 41-0693889

3. HUD Program: Continuum of Care Program

4. Amount of HUD Assistance Requested/Received

4a. Total Amount Requested for this project: \$647,213

5. State the name and location (street address, city and state) of the project or activity: ROOF Project Wilder Renewal FY24 451 Lexington Pkwy N Saint Paul Minnesota

Refer to project name, addresses and CoC Project Identifying Number (PIN) entered into the attached project application.

Part I Threshold Determinations

1. Are you applying for assistance for a specific project or activity? Yes
(For further information, see 24 CFR Sec. 4.3).

2. Have you received or do you expect to receive assistance within the jurisdiction of the Department (HUD), involving the project or activity in this application, in excess of \$200,000 during this fiscal year (Oct. 1 - Sep. 30)? For further information, see 24 CFR Sec. 4.9. Yes

Part II Other Government Assistance Provided or Requested/Expected Sources and Use of Funds

Such assistance includes, but is not limited to, any grant, loan, subsidy, guarantee, insurance, payment, credit, or tax benefit.

Department/Local Agency Name and Address	Type of Assistance	Amount Requested / Provided	Expected Uses of the Funds
FHPAP, Ramsey County, 160 E. Kellogg Boulevard, Saint Paul, MN 55101	Grant - two years	\$171,996.00	ROOF Project - staffing, household assistance
n/a	n/a	0.0	n/a
n/a	n/a	\$0.00	n/a
n/a	n/a	\$0.00	n/a
n/a	n/a	\$0.00	n/a

Part III Interested Parties

You must disclose:

1. All developers, contractors, or consultants involved in the application for the assistance or in the planning, development, or implementation of the project or activity and
2. any other person who has a financial interest in the project or activity for which the assistance is sought that exceeds \$50,000 or 10 percent of the assistance (whichever is lower).

Alphabetical list of all persons with a reportable financial interest in the project or activity (For individuals, give the last name first)	Social Security No. or Employee ID No.	Type of Participation	Financial Interest in Project/Activity (\$)	Financial Interest in Project/Activity (%)
n/a		n/a	\$0.00	0%
n/a		n/a	\$0.00	0%
n/a		n/a	\$0.00	0%
n/a		n/a	\$0.00	0%
n/a		n/a	\$0.00	0%

Certification

Warning: If you knowingly make a false statement on this form, you may be subject to civil or criminal penalties under Section 1001 of Title 18 of the United States Code. In addition, any person who knowingly and materially violates any required disclosures of information, including intentional nondisclosure, is subject to civil money penalty not to exceed \$10,000 for each violation.

I certify that the information provided on this form and in any accompanying documentation is true and accurate. I acknowledge that making, presenting, submitting, or causing to be submitted a false, fictitious, or fraudulent statement, representation, or certification may result in criminal, civil, and/or administrative sanctions, including fines, penalties, and imprisonment.

I AGREE: ☒

Name / Title of Authorized Official: Armando Camacho, CEO

Signature of Authorized Official: Considered signed upon submission in e-snaps.

Date Signed: 08/23/2022

1H. HUD 50070

HUD 50070 Certification for a Drug Free Workplace

Applicant Name: Amherst H. Wilder Foundation

Program/Activity Receiving Federal Grant Funding: CoC Program

Acting on behalf of the above named Applicant as its Authorized Official, I make the following certifications and agreements to the Department of Housing and Urban Development (HUD) regarding the sites listed below:

I certify that the above named Applicant will or will continue to provide a drug-free workplace by:	
a. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the Applicant's workplace and specifying the actions that will be taken against employees for violation of such prohibition.	e. Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph d.(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;
b. Establishing an on-going drug-free awareness program to inform employees — (1) The dangers of drug abuse in the workplace (2) The Applicant's policy of maintaining a drug-free workplace; (3) Any available drug counseling, rehabilitation, and employee assistance programs; and (4) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace.	f. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph d.(2), with respect to any employee who is so convicted — (1) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or (2) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;
c. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph a.;	g. Making a good faith effort to continue to maintain a drugfree workplace through implementation of paragraphs a. thru f.
d. Notifying the employee in the statement required by paragraph a. that, as a condition of employment under the grant, the employee will — (1) Abide by the terms of the statement; and (2) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;	

Sites for Work Performance.

The Applicant shall list (on separate pages) the site(s) for the performance of work done in connection with the HUD funding of the program/activity shown above: Place of Performance shall include the street address, city, county, State, and zip code. Identify each sheet with the Applicant name and address and the program/activity receiving grant funding.)
 Workplaces, including addresses, entered in the attached project application.
 Refer to addresses entered into the attached project application.

I certify that the information provided on this form and in any accompanying documentation is true and accurate. I acknowledge that making, presenting, submitting, or causing to be submitted a false, fictitious, or fraudulent statement, representation, or certification may result in criminal, civil, and/or administrative sanctions, including fines, penalties, and imprisonment.

X

WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§ 287, 1001, 1010, 1012; 31 U.S.C. §3729, 3802)

Authorized Representative

Prefix: Mr.

First Name: Armando

Middle Name

Last Name: Camacho

Suffix:

Title: CEO

Telephone Number: (651) 280-2450
(Format: 123-456-7890)

Fax Number: (651) 280-3450
(Format: 123-456-7890)

Email: Armando.camacho@wilder.org

Signature of Authorized Representative: Considered signed upon submission in e-snaps.

Date Signed: 08/26/2022

CERTIFICATION REGARDING LOBBYING

Certification for Contracts, Grants, Loans, and Cooperative Agreements

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Statement for Loan Guarantees and Loan Insurance

The undersigned states, to the best of his or her knowledge and belief, that:

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Applicant: Amherst H. Wilder Foundation
Project: ROOF Project Wilder Renewal FY24

077624401
197785

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate:

X

Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Applicant's Organization: Amherst H. Wilder Foundation

Name / Title of Authorized Official: Armando Camacho, CEO

Signature of Authorized Official: Considered signed upon submission in e-snaps.

Date Signed: 08/26/2022

1J. SF-LLL

DISCLOSURE OF LOBBYING ACTIVITIES

**Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352.
Approved by OMB0348-0046**

HUD requires a new SF-LLL submitted with each annual CoC competition and completing this screen fulfills this requirement.

Answer "Yes" if your organization is engaged in lobbying associated with the CoC Program and answer the questions as they appear next on this screen. The requirement related to lobbying as explained in the SF-LLL instructions states: "The filing of a form is required for each payment or agreement to make payment to any lobbying entity for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with a covered Federal action."

Answer "No" if your organization is NOT engaged in lobbying.

Does the recipient or subrecipient of this CoC grant participate in federal lobbying activities (lobbying a federal administration or congress) in connection with the CoC Program? No

Legal Name: Amherst H. Wilder Foundation

Street 1: 451 Lexington Pkwy N

Street 2:

City: Saint Paul

County: Ramsey

State: Minnesota

Country: United States

Zip / Postal Code: 55104-4636

11. Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

I certify that this information is true and complete. ☒

Authorized Representative

Prefix: Mr.

First Name: Armando

Middle Name:

Last Name: Camacho

Suffix:

Title: CEO

Telephone Number: (651) 280-2450
(Format: 123-456-7890)

Fax Number: (651) 280-3450
(Format: 123-456-7890)

Email: Armando.camacho@wilder.org

Signature of Authorized Official: Considered signed upon submission in e-snaps.

Date Signed: 08/26/2022

IK. SF-424B

(SF-424B) ASSURANCES - NON-CONSTRUCTION PROGRAMS

OMB Number: 4040-0007
Expiration Date: 02/28/2022

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

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

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

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

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

Authorized Representative for: Amherst H. Wilder Foundation

Prefix: Mr.

First Name: Armando

Applicant: Amherst H. Wilder Foundation
Project: ROOF Project Wilder Renewal FY24

077624401
197785

Middle Name:

Last Name: Camacho

Suffix:

Title: CEO

Signature of Authorized Certifying Official: Considered signed upon submission in e-snaps.

Date Signed: 08/26/2022

Information About Submission without Changes

Follow the instructions below making note of the exceptions and limitations to the "Submit Without Changes" process.

In general, HUD expects a project's proposed project application information will remain the same from year-to-year unless changes are directed by HUD or approved through the grant agreement amendment process. However, HUD expects applicants to carefully review their information to determine if submitting without changes accurately reflects the expiring grant requesting renewal.

The data from previously submitted new and renewal project applications can be imported into a FY 2022 renewal project application. The "Submit without Changes" process is not applicable for:

- first time renewing project applications
- a project application that did not import last FY 2021 information
- a project that had Issues or Conditions that were addressed in FY 2021 Post-Award and updates need to be reflected in the FY 2022 project application
- a project that had amendments approved in FY 2020 or FY 2021 that need to be reflected in the FY 2022 project application

e-snaps will automatically be set to "Make Changes" and all questions on each screen must be updated.

The e-snaps screens that remain "open" for required annual updates and do not affect applicants' ability to select "Submit without Changes" are:

- Recipient Performance Screen
- Consolidation and Expansion
- Screen 3A. Project Detail
- Screen 6D. Sources of Match
- All of Part 7: Attachments and Certification; and
- All of Part 8: Submission Summary.

All other screens in Part 2 through Part 6 begin in "Read-Only" format and should be reviewed for accuracy; including any updates that were made to the 2021 project during the CoC Post Award Issues and Conditions process or as amended. If all the imported data is accurate and no edits or updates are needed to any screens other than the mandatory screens and questions noted above, project applicants should select "Submit Without Changes" in Part 8. If project applicants imported data and do need to make updates to the information on one or more screens, they must navigate to Part 8: "Submission Without Changes" Screen, select "Make Changes", and check the box next to each relevant screen title to unlock screens for editing. After project applicants select the screens they intend to edit via checkboxes, click ""Save"" and those screens will be available for edit. Once a project applicant selects a checkbox and clicks ""Save"", the project applicant cannot uncheck the box.

Please refer to the Detailed Instructions found on the left side menu of e-snaps or hud.gov to find more in depth information about applying under the FY 2022 CoC Competition.

Submission Without Changes

1. Are the requested renewal funds reduced from the previous award due to reallocation? Yes
2. Do you wish to submit this application without making changes? Please refer to the guidelines below to inform you of the requirements. Make changes

The applicant has either selected "Yes" to Question #1, has not brought forward details from a previously awarded renewal project application, or has manually selected "Make Changes" to question #2 and has checked a checkbox. The applicant must therefore make changes to the application information. If this is not a first time renewal and the applicant would like to bring forward information from a previously awarded renewal project application, exit this application, click on the "Projects" link from the left menu, select "Renewal Project Application FY2019" from the "Funding Opportunity Name" dropdown, click on the folder icon to create a renewal project, and select an expiring renewal project from the drop down list next to the "Import Data From" field.

3. Specify which screens require changes by clicking the checkbox next to the name and then clicking the Save button.

Part 2 - Subrecipient Information	
2A. Subrecipients	<input checked="" type="checkbox"/>
Part 3 - Project Information	
3A. Project Detail	<input checked="" type="checkbox"/>
3B. Description	<input checked="" type="checkbox"/>
Part 4 - Housing Services and HMIS	
4A. Services	<input checked="" type="checkbox"/>
4B. Housing Type	<input checked="" type="checkbox"/>
Part 5 - Participants and Outreach Information	
5A. Households	<input checked="" type="checkbox"/>
5B. Subpopulations	<input checked="" type="checkbox"/>
Part 6 - Budget Information	

Applicant: Amherst H. Wilder Foundation
Project: ROOF Project Wilder Renewal FY24

077624401
197785

6A. Funding Request	<input checked="checked" type="checkbox"/>
6C. Rental Assistance	<input checked="checked" type="checkbox"/>
6D. Match	<input checked="checked" type="checkbox"/>
6E. Summary Budget	<input checked="checked" type="checkbox"/>
Part 7 - Attachment(s) & Certification	
7A. Attachment(s)	<input checked="checked" type="checkbox"/>
7B. Certification	<input checked="checked" type="checkbox"/>

You have selected "Make Changes" to question #2 above. Provide a brief description of the changes that will be made to the project information screens (bullets are appropriate):

Updates for FY23

You have selected "Make Changes." Once this screen is saved, you will be prohibited from "unchecking" any box that has been checked regardless of whether a change to data on the corresponding screen will be made.

Recipient Performance

1. Did you submit your previous year's Annual Performance Report (APR) on time? Yes

2. Do you have any unresolved HUD Monitoring or OIG Audit finding(s) concerning any previous grant term related to this renewal project request? No

3. Do you draw funds quarterly for your current renewal project? Yes

4. Have any funds remained available for recapture by HUD for the most recently expired grant term related to this renewal project request? Yes

4a. If HUD recaptured funds provide an explanation.

We had staff turnover during the grant period which resulted in unused funds in the support services budget.

Renewal Grant Consolidation or Renewal Grant Expansion



The FY2022 CoC Competition will continue offering opportunities to expand or consolidate CoC projects.

1. Expansions and Consolidations will submit individual applications.
 - a. Expansions will ONLY submit a Stand-Alone Renewal application and a Stand-Alone New application.
 - b. Consolidations will ONLY submit individual renewal project applications, identifying the renewal application that will survive, and the renewal applications that will terminate. Up to 10 grants may be included in a consolidation.
2. HUD HQ will combine the budget data (e.g., units, budgets) for Expansion or Consolidation requests from the individual project applications selected for conditional award and provide a data report with further instructions for the field office and conditional recipient.

**1. Is this renewal project application requesting to No
consolidate or expand?**

If "No" click on "Next" or "Save & Next" below to move to the next screen.

2A. Project Subrecipients

This form lists the subrecipient organization(s) for the project. To add a subrecipient, select the  icon. To view or update subrecipient information already listed, select the view  option.

Total Expected Sub-Awards: \$0

Organization	Type	Sub-Award Amount
This list contains no items		

3A. Project Detail

1. Expiring Grant Project Identification Number (PIN): MN0048

(e.g., the "Federal Award Identifier" indicated on form 1A. Application Type)

2. CoC Number and Name: MN-501 - Saint Paul/Ramsey County CoC

3. CoC Collaborative Applicant Name: Ramsey County

4. Project Name: ROOF Project Wilder Renewal FY24

5. Project Status: Standard

6. Component Type: PH

6a. Select the type of PH project. RRH

7. Is your organization, or subrecipient, a victim service provider defined in 24 CFR 578.3? No

3B. Project Description

1. Provide a description that addresses the entire scope of the proposed project.

The ROOF Project proposes to serve 32 families with rental assistance and culturally competent supportive services, including serving large families through 3 and 4 bedroom units.

The ROOF Project meets the Ramsey County 2022 Needs Assessment recommendations by providing culturally-responsive services to families, a majority of which are African-American. We work to address disparities by looking at our service data disaggregated by racial demographics. This helps us work intentionally at providing families the support they need. We have been a Housing First program for a decade plus, and use a participant-centered approach to goal setting.

COC NOFA priorities:

- we provide referrals to mental and physical health providers, including transportation assistance;
- our goal priority for FY22 is to center the voices of people served through our Whole Family Approach strategic priority. This includes increased feedback methods for family voice and the possible creation of a family council;
- ROOF uses a Housing First model;
- We pride ourselves on high data quality;
- we participate in the quarterly data quality process.

Last year, we served 283 people through the ROOF Project. Fifty-one percent of the participants in our programs are children under the age of 12. Fifty-two percent of heads of household have experienced domestic violence. Families increase their income in the ROOF Project - 58% of families receive earned income at exit, compared to 40% at entry.

2. Check the appropriate box(s) if this project will have a specific subpopulation focus. (Select all that apply)

N/A - Project Serves All Subpopulations	<input type="checkbox"/>	Domestic Violence	<input type="checkbox"/>
Veterans	<input type="checkbox"/>	Substance Abuse	<input type="checkbox"/>
Youth (under 25)	<input type="checkbox"/>	Mental Illness	<input type="checkbox"/>
Families with Children	<input type="checkbox"/>	HIV/AIDS	<input type="checkbox"/>
		Chronic Homeless	<input type="checkbox"/>
		Other(Click 'Save' to update)	<input type="checkbox"/>

3. Housing First

3a. Does the project quickly move participants into permanent housing Yes

3b. Does the project enroll program participants who have the following barriers?
Select all that apply.

Having too little or little income	<input checked="" type="checkbox"/>
Active or history of substance use	<input checked="" type="checkbox"/>
Having a criminal record with exceptions for state-mandated restrictions	<input checked="" type="checkbox"/>
History of victimization (e.g. domestic violence, sexual assault, childhood abuse)	<input checked="" type="checkbox"/>
None of the above	<input type="checkbox"/>

3c. Will the project prevent program participant termination for the following reasons? Select all that apply.

Failure to participate in supportive services	<input checked="" type="checkbox"/>
Failure to make progress on a service plan	<input checked="" type="checkbox"/>
Loss of income or failure to improve income	<input checked="" type="checkbox"/>
Any other activity not covered in a lease agreement typically found for unassisted persons in the project's geographic area	<input checked="" type="checkbox"/>
None of the above	<input type="checkbox"/>

3d. Does the project follow a "Housing First" approach? Yes

4A. Supportive Services for Program Participants

1. For all supportive services available to program participants, indicate who will provide them and how often they will be provided.
 Click 'Save' to update.

Supportive Services	Provider	Frequency
Assessment of Service Needs	Non-Partner	As needed
Assistance with Moving Costs	Non-Partner	As needed
Case Management	Applicant	Weekly
Child Care	Non-Partner	As needed
Education Services	Non-Partner	As needed
Employment Assistance and Job Training	Applicant	Weekly
Food	Non-Partner	As needed
Housing Search and Counseling Services	Applicant	As needed
Legal Services	Non-Partner	As needed
Life Skills Training	Non-Partner	As needed
Mental Health Services	Non-Partner	As needed
Outpatient Health Services	Non-Partner	As needed
Outreach Services	Applicant	As needed
Substance Abuse Treatment Services	Non-Partner	As needed
Transportation	Non-Partner	As needed
Utility Deposits	Non-Partner	As needed

Identify whether the project includes the following activities:



2. Transportation assistance to program participants to attend mainstream benefit appointments, employee training, or jobs? Yes

3. Annual follow-up with program participants to ensure mainstream benefits are received and renewed? Yes

4. Do program participants have access to SSI/SSDI technical assistance provided by this project, subrecipient, or partner agency? Yes

4a. Has the staff person providing the technical assistance completed SOAR training in the past 24 months? Yes

4B. Housing Type and Location

The following list summarizes each housing site in the project. To add a housing site to the list, select the  icon. To view or update a housing site already listed, select the  icon.

Total Units: 32

Total Beds: 110

Housing Type	Housing Type (JOINT)	Units	Beds
Scattered-site apartments (...)	---	32	110

4B. Housing Type and Location Detail

1. Housing Type: Scattered-site apartments (including efficiencies)

2. Indicate the maximum number of units and beds available for program participants at the selected housing site.

a. Units: 32

b. Beds: 110

3. Address

Project applicants must enter an address for all proposed and existing properties. If the location is not yet known, enter the expected location of the housing units. For Scattered-site and Single-family home housing, or for projects that have units at multiple locations, project applicants should enter the address where the majority of beds will be located or where the majority of beds are located as of the application submission. Where the project uses tenant-based rental assistance in the RRH portion, or if the address for scattered-site or single-family homes housing cannot be identified at the time of application, enter the address for the project's administration office. Projects serving victims of domestic violence, including human trafficking, must use a PO Box or other anonymous address to ensure the safety of participants.

Street 1: 451 Lexington Parkway North

Street 2:

City: Saint Paul

State: Minnesota

ZIP Code: 55104

4. Select the geographic area(s) associated with the address:
(for multiple selections hold CTRL Key)

279003 Anoka County, 279037 Dakota County,
279123 Ramsey County, 279053 Hennepin
County, 279139 Scott County, 274164 St Paul

5A. Program Participants - Households

Households	Households with at Least One Adult and One Child	Adult Households without Children	Households with Only Children	Total
Total Number of Households	32	0	0	32

Characteristics	Persons in Households with at Least One Adult and One Child	Adult Persons in Households without Children	Persons in Households with Only Children	Total
Persons over age 24	35	0		35
Persons ages 18-24	15	0		15
Accompanied Children under age 18	60		0	60
Unaccompanied Children under age 18			0	0
Total Persons	110	0	0	110

Click Save to automatically calculate totals

5B. Program Participants - Subpopulations

Persons in Households with at Least One Adult and One Child

Characteristics	CH (Not Veterans)	CH Veterans	Veterans (Not CH)	Chronic Substance Abuse	HIV/AIDS	Severely Mentally Ill	DV	Physical Disability	Developmental Disability	Persons Not Represented by a Listed Subpopulation
Persons over age 24			0	5		10	10			10
Persons ages 18-24			0				5			10
Children under age 18						2	30			28
Total Persons	0	0	0	5	0	12	45	0	0	48

Click Save to automatically calculate totals

Persons in Households without Children

Characteristics	CH (Not Veterans)	CH Veterans	Veterans (Not CH)	Chronic Substance Abuse	HIV/AIDS	Severely Mentally Ill	DV	Physical Disability	Developmental Disability	Persons Not Represented by a Listed Subpopulation
Persons over age 24										
Persons ages 18-24										
Total Persons	0	0	0	0	0	0	0	0	0	0

Persons in Households with Only Children

Characteristics	CH (Not Veterans)	CH Veterans	Veterans (Not CH)	Chronic Substance Abuse	HIV/AIDS	Severely Mentally Ill	DV	Physical Disability	Developmental Disability	Persons Not Represented by a Listed Subpopulation
Accompanied Children under age 18										
Unaccompanied Children under age 18										
Total Persons	0			0	0	0	0	0	0	0

Describe the unlisted subpopulations referred to above:

The unlisted subpopulations are comprised of families and children not represented by the categories provided. Additionally, some individuals fit multiple subpopulations but are not represented in the numbers above due to the format of the application. In the ROOF Project, 86% of our households are headed by single mothers. Forty-nine percent of clients reported a mental illness, and 45% of households reporting as DV survivors have experienced domestic violence in the last year.

6A. Funding Request

1. Do any of the properties in this project have an active restrictive covenant? No

2. Was the original project awarded as either a Samaritan Bonus or Permanent Housing Bonus project? No

3. Does this project propose to allocate funds according to an indirect cost rate? Yes

Indirect cost rate proposals should be submitted as soon as the applicant is notified of a conditional award. Conditional award recipients will be asked to submit the proposal rate during the e-snaps post-award process.

Applicants with an approved indirect cost rate must submit a copy of the approval with this application.

a. Please complete the indirect cost rate schedule below:



Cognizant Agency	Indirect Cost Rate	Direct Cost Base	Plan approved by cognizant agency or will use 10% de minimis rate
U.S. Department of Housing and Urban Development	32%	\$647,213	Approved Rate

4. Renewal Grant Term: This field is pre-populated with a one-year grant term and cannot be edited: 1 Year

5. Select the costs for which funding is requested:

Rental Assistance	<input checked="" type="checkbox"/>
Supportive Services	<input checked="" type="checkbox"/>
HMIS	<input type="checkbox"/>

6C. Rental Assistance Budget

The following list summarizes the rental assistance funding request for the total term of the project. To add information to the list, select the  icon. To view or update information already listed, select the  icon.

Total Request for Grant Term:		\$335,808	
Total Units:		32	
Type of Rental Assistance	FMR Area	Total Units Requested	Total Request
TRA	MN - Minneapolis-St. Paul-Bloomington...	32	\$335,808

Rental Assistance Budget Detail

Type of Rental Assistance: TRA

Metropolitan or non-metropolitan fair market rent area: MN - Minneapolis-St. Paul-Bloomington, MN-WI
HUD Metro FMR Area (2700399999)

Does the applicant request rental assistance funding for less than the area's per unit size fair market rents? Yes

Size of Units	# of Units (Applicant)	FMR Area (Applicant)	HUD Paid Rent (Applicant)	12 Months	Total Request (Applicant)
SRO		x \$699	\$559	x 12	= \$0
0 Bedroom		x \$932	\$745	x 12	= \$0
1 Bedroom		x \$1,078	\$932	x 12	= \$0
2 Bedrooms	26	x \$1,329	\$795	x 12	= \$248,040
3 Bedrooms	3	x \$1,841	\$1,118	x 12	= \$40,248
4 Bedrooms	3	x \$2,145	\$1,320	x 12	= \$47,520
5 Bedrooms		x \$2,467	\$2,219	x 12	= \$0
6 Bedrooms		x \$2,789	\$2,211	x 12	= \$0
7 Bedrooms		x \$3,110	\$2,466	x 12	= \$0
8 Bedrooms		x \$3,432	\$2,721	x 12	= \$0
9 Bedrooms		x \$3,754	\$2,976	x 12	= \$0
Total Units and Annual Assistance Requested		32			\$335,808
Grant Term					1 Year
Total Request for Grant Term					\$335,808

Click the 'Save' button to automatically calculate totals.

6D. Sources of Match

The following list summarizes the funds that will be used as Match for this project. To add a Match source to the list, select the icon. To view or update a Match source already listed, select the icon.

Summary for Match

Total Value of Cash Commitments:	\$161,804
Total Value of In-Kind Commitments:	\$0
Total Value of All Commitments:	\$161,804

1. Will this project generate program income described in 24 CFR 578.97 to use as Match for this project? No

Type	Source	Contributor	Value of Commitments
Cash	Government	FHPAP Grant	\$85,998
Cash	Private	Greater Twin Citi...	\$72,761
Cash	Private	Wilder Foundation	\$3,045

Sources of Match Detail

1. Type of Match Commitment: Cash
2. Source: Government
3. Name of Source: FHPAP Grant
(Be as specific as possible and include the office or grant program as applicable)
4. Amount of Written Commitment: \$85,998

Sources of Match Detail

1. Type of Match Commitment: Cash
2. Source: Private
3. Name of Source: Greater Twin Cities United Way
(Be as specific as possible and include the office or grant program as applicable)
4. Amount of Written Commitment: \$72,761

Sources of Match Detail

1. Type of Match Commitment: Cash
2. Source: Private
3. Name of Source: Wilder Foundation
(Be as specific as possible and include the office or grant program as applicable)
4. Amount of Written Commitment: \$3,045

6E. Summary Budget

The following information summarizes the funding request for the total term of the project. Budget amounts from the Leased Units, Rental Assistance, and Match screens have been automatically imported and cannot be edited. However, applicants must confirm and correct, if necessary, the total budget amounts for Leased Structures, Supportive Services, Operating, HMIS, and Admin. Budget amounts must reflect the most accurate project information according to the most recent project grant agreement or project grant agreement amendment, the CoC's final HUD-approved FY 2018 GIW or the project budget as reduced due to CoC reallocation. Please note that, new for FY 2018, there are no detailed budget screens for Leased Structures, Supportive Services, Operating, or HMIS costs. HUD expects the original details of past approved budgets for these costs to be the basis for future expenses. However, any reasonable and eligible costs within each CoC cost category can be expended and will be verified during a HUD monitoring.

Eligible Costs	Total Assistance Requested for 1 year Grant Term (Applicant)
1a. Leased Units	\$0
1b. Leased Structures	\$0
2. Rental Assistance	\$335,808
3. Supportive Services	\$276,078
4. Operating	\$0
5. HMIS	\$0
6. Sub-total Costs Requested	\$611,886
7. Admin (Up to 10%)	\$35,327
8. Total Assistance plus Admin Requested	\$647,213
9. Cash Match	\$161,804
10. In-Kind Match	\$0
11. Total Match	\$161,804
12. Total Budget	\$809,017

7A. Attachment(s)

Document Type	Required?	Document Description	Date Attached
1) Subrecipient Nonprofit Documentation	No	501c3 documentation	09/13/2021
2) Other Attachment	No	ROOF attachments	08/26/2022
3) Other Attachment	No		

Attachment Details

Document Description: 501c3 documentation

Attachment Details

Document Description: ROOF attachments

Attachment Details

Document Description: Match documentation

7B. Certification

A. For all projects:

Fair Housing and Equal Opportunity

It will comply with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000(d)) and regulations pursuant thereto (Title 24 CFR part I), which state that no person in the United States shall, on the ground of race, color or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which the applicant receives Federal financial assistance, and will immediately take any measures necessary to effectuate this agreement. With reference to the real property and structure(s) thereon which are provided or improved with the aid of Federal financial assistance extended to the applicant, this assurance shall obligate the applicant, or in the case of any transfer, transferee, for the period during which the real property and structure(s) are used for a purpose for which the Federal financial assistance is extended or for another purpose involving the provision of similar services or benefits.

It will comply with the Fair Housing Act (42 U.S.C. 3601-19), as amended, and with implementing regulations at 24 CFR part 100, which prohibit discrimination in housing on the basis of race, color, religion, sex, disability, familial status or national origin.

It will comply with Executive Order 11063 on Equal Opportunity in Housing and with implementing regulations at 24 CFR Part 107 which prohibit discrimination because of race, color, creed, sex or national origin in housing and related facilities provided with Federal financial assistance.

It will comply with Executive Order 11246 and all regulations pursuant thereto (41 CFR Chapter 60-1), which state that no person shall be discriminated against on the basis of race, color, religion, sex or national origin in all phases of employment during the performance of Federal contracts and shall take affirmative action to ensure equal employment opportunity. The applicant will incorporate, or cause to be incorporated, into any contract for construction work as defined in Section 130.5 of HUD regulations the equal opportunity clause required by Section 130.15(b) of the HUD regulations.

It will comply with Section 3 of the Housing and Urban Development Act of 1968, as amended (12 U.S.C. 1701(u)), and regulations pursuant thereto (24 CFR Part 135), which require that to the greatest extent feasible opportunities for training and employment be given to lower-income residents of the project and contracts for work in connection with the project be awarded in substantial part to persons residing in the area of the project.

It will comply with Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), as amended, and with implementing regulations at 24 CFR Part 8, which prohibit discrimination based on disability in Federally-assisted and conducted programs and activities.

It will comply with the Age Discrimination Act of 1975 (42 U.S.C. 6101-07), as amended, and implementing regulations at 24 CFR Part 146, which prohibit discrimination because of age in projects and activities receiving Federal financial assistance.

It will comply with Executive Orders 11625, 12432, and 12138, which state that program participants shall take affirmative action to encourage participation by businesses owned and operated by members of minority groups and women.

If persons of any particular race, color, religion, sex, age, national origin, familial status, or disability who may qualify for assistance are unlikely to be reached, it will establish additional procedures to ensure that interested persons can obtain information concerning the assistance. It will comply with the reasonable modification and accommodation requirements and, as appropriate, the accessibility requirements of the Fair Housing Act and section 504 of the Rehabilitation Act of 1973, as amended.

Additional for Rental Assistance Projects:

If applicant has established a preference for targeted populations of disabled persons pursuant to 24 CFR 578.33(d) or 24 CFR 582.330(a), it will comply with this section's nondiscrimination requirements within the designated population.

B. For non-Rental Assistance Projects Only.

20-Year Operation Rule.

Applicants receiving assistance for acquisition, rehabilitation or new construction: The project will be operated for no less than 20 years from the date of initial occupancy or the date of initial service provision for the purpose specified in the application.

15-Year Operation Rule – 24 CFR part 578 only.

Applicants receiving assistance for acquisition, rehabilitation or new construction: The project will be operated for no less than 15 years from the date of initial occupancy or the date of initial service provision for the purpose specified in the application.

1-Year Operation Rule.

For applicants receiving assistance for supportive services, leasing, or operating costs but not receiving assistance for acquisition, rehabilitation, or new construction: The project will be operated for the purpose specified in the application for any year for which such assistance is provided.

C. Explanation.

Where the applicant is unable to certify to any of the statements in this certification, such applicant shall provide an explanation.

Applicant: Amherst H. Wilder Foundation
Project: ROOF Project Wilder Renewal FY24

077624401
197785

Name of Authorized Certifying Official Armando Camacho

Date: 08/26/2022

Title: CEO

Applicant Organization: Amherst H. Wilder Foundation

PHA Number (For PHA Applicants Only):

I certify that I have been duly authorized by the applicant to submit this Applicant Certification and to ensure compliance. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties . (U.S. Code, Title 218, Section 1001).

X

Active SAM Status Requirement.

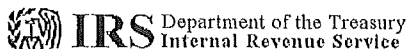
I certify that our organization has an active System for Award Management (SAM) registration as required by 2 CFR 200.300(b) at the time of project application submission to HUD and will ensure this SAM registration will be renewed annually to meet this requirement.

X

8B Submission Summary

Page	Last Updated
1A. SF-424 Application Type	08/23/2022
1B. SF-424 Legal Applicant	08/23/2022
1C. SF-424 Application Details	No Input Required
1D. SF-424 Congressional District(s)	08/23/2022
Renewal Project Application FY2022	Page 47 08/26/2022

1E. SF-424 Compliance	08/23/2022
1F. SF-424 Declaration	08/23/2022
1G. HUD-2880	08/23/2022
1H. HUD-50070	08/23/2022
1I. Cert. Lobbying	08/23/2022
1J. SF-LLL	08/23/2022
IK. SF-424B	08/23/2022
Submission Without Changes	08/26/2022
Recipient Performance	08/23/2022
Renewal Grant Consolidation or Renewal Grant Expansion	08/23/2022
2A. Subrecipients	No Input Required
3A. Project Detail	08/23/2022
3B. Description	08/23/2022
4A. Services	08/23/2022
4B. Housing Type	08/23/2022
5A. Households	08/23/2022
5B. Subpopulations	08/23/2022
6A. Funding Request	08/23/2022
6C. Rental Assistance	08/23/2022
6D. Match	08/25/2022
6E. Summary Budget	No Input Required
7A. Attachment(s)	08/26/2022
7B. Certification	08/23/2022



Department of the Treasury
Internal Revenue Service

P.O. Box 2508
Cincinnati OH 45201

In reply refer to: 0248164798
June 15, 2015 LTR 4168C 0
41-0693889 000000 00

00025633

BODC: TE

AMHERST H WILDER FOUNDATION
% DOHERTY EMPLOYMENT GROUP
451 LEXINGTON PARKWAY N
ST PAUL MN 55104



037671

Employer Identification Number: 41-0693889
Person to Contact: Mr Bayer
Toll Free Telephone Number: 1-877-829-5500

Dear Taxpayer:

This is in response to your June 04, 2015, request for information regarding your tax-exempt status.

Our records indicate that you were recognized as exempt under section 501(c)(3) of the Internal Revenue Code in a determination letter issued in August 1942.

Our records also indicate that you are not a private foundation within the meaning of section 509(a) of the Code because you are described in section(s) 509(a)(1) and 170(b)(1)(A)(vi).

Donors may deduct contributions to you as provided in section 170 of the Code. Bequests, legacies, devises, transfers, or gifts to you or for your use are deductible for Federal estate and gift tax purposes if they meet the applicable provisions of sections 2055, 2106, and 2522 of the Code.

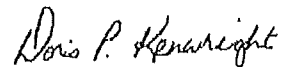
Please refer to our website www.irs.gov/eo for information regarding filing requirements. Specifically, section 6033(j) of the Code provides that failure to file an annual information return for three consecutive years results in revocation of tax-exempt status as of the filing due date of the third return for organizations required to file. We will publish a list of organizations whose tax-exempt status was revoked under section 6033(j) of the Code on our website beginning in early 2011.

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June 15, 2015 LTR 4168C 0
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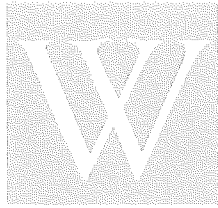
AMHERST H WILDER FOUNDATION
% DOHERTY EMPLOYMENT GROUP
451 LEXINGTON PARKWAY N
ST PAUL MN 55104

If you have any questions, please call us at the telephone number shown in the heading of this letter.

Sincerely yours,



Doris Kenwright, Operation Mgr.
Accounts Management Operations 1



AMHERST H.
WILDER
FOUNDATION

ESTABLISHED 1904

Here for good.

www.wilder.org

August 26, 2022

Erin McGillivray
CPD Representative
HUD MINNEAPOLIS
212 3rd Ave. S., Suite 150
Minneapolis, MN 55401

Re: ROOF Project
HUD Cash Match for Grant MN0048
7/1/2023 - 6/30/2024

The Amherst H. Wilder Foundation (Wilder) is pleased to document our cash match requirements for the ROOF Project – grant number MN0048.

The \$161,804 cash match is comprised of the following sources:

- \$98,640 from Ramsey County's Family Homeless Prevention Assistance Program
- \$72,761 from the Greater Twin Cities United Way
- \$3,045 from Wilder's endowment and annual fund.

We are delighted to make this contribution to such an essential program in our community. If you have any questions or need additional information, please contact Lindsay Bacher at lindsay.bacher@wilder.org or 651-280-2380.

Sincerely,

Armando Camacho
President and CEO
Wilder Foundation

NONPROFIT RATE AGREEMENT

EIN: 1410693889A1

DATE: 01/05/2021

ORGANIZATION:

FILING REF.: The preceding
agreement was dated
04/15/2016

Amherst H. Wilder Foundation
451 Lexington Pkwy North
St. Paul, MN 55104

The rates approved in this agreement are for use on grants, contracts and other agreements with the Federal Government, subject to the conditions in Section III.

SECTION I: INDIRECT COST RATES

RATE TYPES: FIXED FINAL PROV. (PROVISIONAL) PRED. (PREDETERMINED)

EFFECTIVE PERIOD

<u>TYPE</u>	<u>FROM</u>	<u>TO</u>	<u>RATE(%)</u>	<u>LOCATION</u>	<u>APPLICABLE TO</u>
FINAL	07/01/2018	06/30/2020	32.29	On Site	All Programs
PROV.	07/01/2020	06/30/2023	32.29	On Site	All Programs

*BASE

Total direct costs excluding capital expenditures (buildings, individual items of equipment; alterations and renovations), that portion of each subaward in excess of \$25,000 and flow-through funds.

ORGANIZATION: Amherst H. Wilder Foundation

AGREEMENT DATE: 1/5/2021

SECTION II: SPECIAL REMARKS

TREATMENT OF FRINGE BENEFITS:

The fringe benefits are specifically identified to each employee and are charged individually as direct costs. The directly claimed fringe benefits are listed below.

TREATMENT OF PAID ABSENCES

Vacation, holiday, sick leave pay and other paid absences are included in salaries and wages and are claimed on grants, contracts and other agreements as part of the normal cost for salaries and wages. Separate claims are not made for the cost of these paid absences.

FRINGE BENEFITS:

FICA
Retirement
Worker's Compensation
Unemployment Insurance
Dental Insurance
Disability Insurance
Life Insurance
Health Insurance

The next indirect cost proposal based on actual costs for the fiscal year ending 06/30/2021, is due by 12/31/2021.

Equipment means tangible personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost which equals or exceeds the lesser of the capitalization level established by the non-Federal entity for financial statement purposes, or \$5,000.

ORGANIZATION: Amherst H. Wilder Foundation

AGREEMENT DATE: 1/5/2021

SECTION III: GENERAL

A. LIMITATIONS:

The rates in this Agreement are subject to any statutory or administrative limitations and apply to a given grant, contract or other agreement only to the extent that funds are available. Acceptance of the rates is subject to the following conditions: (1) Only costs incurred by the organization were included in its indirect cost pool as finally accepted; such costs are legal obligations of the organization and are allowable under the governing cost principles; (2) The same costs that have been treated as indirect costs are not claimed as direct costs; (3) Similar types of costs have been accorded consistent accounting treatment; and (4) The information provided by the organization which was used to establish the rates is not later found to be materially incomplete or inaccurate by the Federal Government. In such situations the rate(s) would be subject to renegotiation at the discretion of the Federal Government.

B. ACCOUNTING CHANGES:

This Agreement is based on the accounting system purported by the organization to be in effect during the Agreement period. Changes to the method of accounting for costs which affect the amount of reimbursement resulting from the use of this Agreement require prior approval of the authorized representative of the cognizant agency. Such changes include, but are not limited to, changes in the charging of a particular type of cost from indirect to direct. Failure to obtain approval may result in cost disallowances.

C. FIXED RATES:

If a fixed rate is in this Agreement, it is based on an estimate of the costs for the period covered by the rate. When the actual costs for this period are determined, an adjustment will be made to a rate of a future year(s) to compensate for the difference between the costs used to establish the fixed rate and actual costs.

D. USE BY OTHER FEDERAL AGENCIES:

The rates in this Agreement were approved in accordance with the authority in Title 2 of the Code of Federal Regulations, Part 200 (2 CFR 200), and should be applied to grants, contracts and other agreements covered by 2 CFR 200, subject to any limitations in A above. The organization may provide copies of the Agreement to other Federal Agencies to give them early notification of the Agreement.

E. OTHER:

If any Federal contract, grant or other agreement is reimbursing indirect costs by a means other than the approved rate(s) in this Agreement, the organization should (1) credit such costs to the affected programs, and (2) apply the approved rate(s) to the appropriate base to identify the proper amount of indirect costs allocable to these programs.

BY THE INSTITUTION:

Amherst H. Wilder Foundation

(INSTITUTION)

(SIGNATURE)

(NAME)

(TITLE)

(DATE)

ON BEHALF OF THE FEDERAL GOVERNMENT:

DEPARTMENT OF HEALTH AND HUMAN SERVICES

(AGENCY)

(SIGNATURE)

Arif Karim

(NAME)

Director, Cost Allocation Services

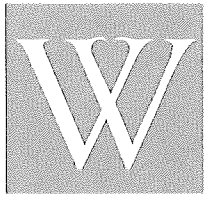
(TITLE)

1/5/2021

(DATE) 1305

HHS REPRESENTATIVE: Denise Shirlee

Telephone: (214) 767-3261



AMHERST H.
WILDER
FOUNDATION

ESTABLISHED 1906

Here for good.

August 26, 2022

RE: HUD COC 2022 competition
Minnesota Place: MN0269
ROOF Project: MN0048

To Whom It May Concern:

I am writing to express our full support of Wilder Foundation – Family Supportive Housing Services' application for the HUD COC 2022 competition. Wilder is committed to bringing our clinical services and professional expertise in supporting mental health in BIPOC communities to this project.

Our Community Mental Health & Wellness (CMHW) center has grown over the last 95 years to encompass a full range of services for children, adults and families, from mild to intensive support. With a focus on whole-person, family-centered, non-four walls and community-coordinated approach to behavioral health care, Wilder is deeply committed to advancing interprofessional, integrated care models, including participation in a federal demonstration of the Certified Community Behavioral Health Clinic (CCBHC) model.

As one of the eight original CCBHCs creating a statewide network across Minnesota, Wilder holds a long-standing focus on serving culturally and linguistically specific communities as well as serving a high proportion immigrants and refugees. More than three-quarters of our client community identify as a person of color, and more than a third speak a primary language other than English. We are committed to creating a behavioral health continuum that centers on meeting the unique needs of BIPOC communities.

As a partner and collaborator committed to the success of the ROOF Project and Minnesota Place participants through this grant project, we will:

- Support the ROOF Project and Minnesota Place in meeting the mental and behavioral health needs of people exiting homelessness so they can be successful in their journeys and fulfilled in their personal lives;

- Provide information about our services and accept referrals for potential clients from the ROOF Project and Minnesota Place around seeking behavioral health services;
- Assist clients in using telehealth and online services to increase access to behavioral health support; and
- Provide services that are respectful of and culturally responsive to the needs and interests of people leaving homelessness who commonly experience trauma related to adverse childhood experiences, criminal involvement, homelessness, racism, systemic inequities, and/or related experiences.

Again, ROOF Project and Minnesota Place residents have our unwavering support for this project in general and for their grant proposal to HUD. An expansion of behavioral health supports, especially to a community that is historically underserved and disserved, will improve the lives of so many. We strongly support this proposal not only for the impact it will have now, but for generations to come.

Sincerely,

A handwritten signature in black ink, appearing to read 'Pahoua Yang', with a large, stylized initial 'P'.

Dr. Pahoua Yang
Vice President, Community Mental Health & Wellness
Amherst H. Wilder Foundation
pahoua.yang@wilder.org



Heading Home Ramsey: 2022 HUD-CoC Competition Project Evaluation and Scoring Tool

Organization Name: Amherst H. Wilder Foundation

Approved

Project Name: ROOF Project Wilder Renewal FY23

Project Type: Rapid Re-Housing (RRH)

Project HMIS ID/Non-DV Projects AHW-RRH-RCC-HUD-CoC-ROOF Wilder (144)

Only:

Project Performance

X = Project result; μ = average of percentages of HUD eligible projects; σ = standard deviation among all percentages

Measures (Scoring)		Definition	Source	Data Item	Low	Mid	High	Achievement Score
CoC Threshold Requirements (All Projects)								
Coordinated Entry Participation (0, 1)	Renewal projects currently report and fill vacancies from Ramsey Coordinated Entry. New projects agree to report and fill vacancies from Ramsey Coordinated Entry.	NOFO Pre-application/HMIS CES Monitoring Report			"No"		"Yes"	Yes: Q24 Pre-App 1
Coordinated Entry Participation (0, 1)	Total % participants who entered during the HUD grant period who had a referral from Coordinated Entry.	MN Core Report for Total Entries:CES Monitoring Report #266 for Referrals:Confirmation from PLM's			"No"		"Yes"	Removed from scoring for all providers 0
Documented Secured Minimum Match (0, 1)	Projects report securing minimum match and have supporting documentation.	NOFO Pre-application			"No"		"Yes"	Yes: Q45-47 Pre-App 1
Cost (0, 1)	Project has reasonable costs per permanent housing exit. ¹	NOFO Pre-application/HMIS			"No"		"Yes"	Yes: Application and 2022 Monitoring 1
Financial Feasibility (0, 1)	Project has feasible financial composition. ²	NOFO Pre-application: Financial Statement and Audit			"No"		"Yes"	Yes: Application and 2022 Monitoring 1
Financial Stability (0, 1)	Project has organizational financial stability. ³	NOFO Pre-application: Financial Statement and Audit			"No"		"Yes"	Yes: Application and 2022 Monitoring 1
Invoices (0,1)	Project has timely submissions of quarterly cost reimbursement to HUD.	FY2020 & 2021 Fiscal/ELOCCS			"No"		"Yes"	Yes: Application and 2022 Monitoring 1
HHR Participation (0, 1)	Renewal project agency actively participates in HHR Governing Board, Committee, Subcommittee meetings. New projects agree to participate in HHR Governing Board/Committee/Subcommittee meetings.	NOFO Pre-application			"No"		"Yes"	Yes: Q27 Pre-App 1
Financial Review (0, 1)	Project has acceptable organizational Audit/Financial Review ⁴	NOFO Pre-application/Application/Financial Statement/Audit			"No"		"Yes"	Yes: Application and 2022 Monitoring 1
Service Model (All Projects)								
Low Barrier Program Eligibility (-1, 0, 2)	Number of options selected indicating clients are not screened out from accessing project. (excludes None of the above as an option)	Project Application Section 3B.3b-b + 3B.3c			≤6 of 8 options	7 of 8 options	8 of 8 options	8 of 8 2
Housing First (-1, 3)	Response to Housing First question (3B.3.d). (excludes None of the above as an option)	3B.3.d			"No"	N/A	"Yes"	Yes 3
Housing First Checklist (-1, 0, 2)	Response to Housing First Checklist questions.	NOFO Pre-application	Ne-response to all 4 checklist questions	Yes-response to all 4 checklist questions		Yes response to all 4 checklist questions		Yes: Q29 Pre-App (4 of 4) 2
Project Performance - Project Partnership(s) with Health Care Providers (i.e., hospitals, clinics, other health care providers)								
(0,1)	Agency can provide documentation (MOU or letter of commitment) from a health care provider that outlines their partnership to support project.	NOFO Pre-application	"No"		"Yes"			Yes: eSNAPS App Attachment 1

Project Performance - Project Partnership(s) with Housing Provider(s) (i.e., Public Housing Authority's, non-CoC funding housing providers, and private landlords)

(0,1)	Agency can provide documentation (MOU or letter of commitment) from a PHA or housing provider that outlines their partnership to support project.	NOFO Pre-application	"No"		"Yes"		No. Q36 Pre-App	0	Unsure if can provide documentation
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Project Performance - Operations (Renewal Projects Only)

Bed Utilization (0, 1, 2)	Average beds occupied of total beds over most recently completed grant year.	HMIS Report "NOFO Scoring Tool" FED-10-SAG-238, January 2020 HUD Results	Tab "PT Counts", average of 4 quarters divided into total beds	<75% bed utilization	75%+ and <90% bed utilization	≥90% bed utilization	81.3%	1	
Number of Persons Served or Targeted (0,1)	Did the program meet the target goal of households served or targeted.	Most recent closed program year (FY2018, FY2019)	"No"	"No"		"Yes"	Yes	1	
Funding Management Unspent Funds (-1, 0, 1)	Percent of total grant award spent through most recently completed program year.	HUD "Recaptured Funds" Report		<90% total grant award	90%+ and <98% total grant award	≥98% total grant award	<90%	-1	
Funding Management Drawdowns (-1, 0, 1)	Frequency of drawdowns throughout the most recently completed program year.	eLOCOS screenshot of drawdowns from most recent completed grant year	Drawdowns occur less than quarterly	Drawdowns occur at least quarterly	Drawdowns occur monthly	Drawdowns occur quarterly	Quarterly	0	
HMIS Data Quality (-1, 0, 1)	Average percentage without errors.	HMIS Report "NOFO Scoring Tool" FED-10-SAG-238	Tab "HMIS Data Quality", sum of errors divided by sum of population for 4 categories subtracted from 100%	All percentages less than one standard deviation from the mean percentages (X<1*-0)	All percentages plus or minus one standard deviation from the mean percentages (1*-0.5X<1+*0)	All percentages greater than one standard deviation from the mean percentages (X>1+*0)	97.2%	0	

Staff turnover impacted spending in the grant period p

Project Performance - Project (Renewal Permanent Supportive Housing Projects Only)

Chronic (-1, 1, 3)	Percentage of CoC-funded beds dedicated to serve chronically homeless households. ⁵	Project Application Section 4B.3		<1% CoC-funded beds	1%+ and <75% CoC-funded beds	≥75% CoC funded beds (includes 100% Dedicated projects)	N/A	0	
Housing Stability: 6 Months (0, 1, 2)	Percent of participants who maintained housing stability within 180 days. ⁶	HMIS Report "NOFO Scoring Tool" FED-10-SAG-238	Tab: "LOT in Program" columns F + G	All percentages less than one standard deviation from the mean percentages (X<1*-0)	All percentages plus or minus one standard deviation from the mean percentages (1*-0.5X<1+*0)	All percentages greater than one standard deviation from the mean percentages (X>1+*0)	N/A	0	
High Barrier Clients Served (0,1,3)	Percent of all clients served who has any disability of long duration	HMIS Report "NOFO Scoring Tool" FED-10-SAG-238	Tab "Population Served" Column H, row for total clients	(same as "Housing Stability")	(same as "Housing Stability")	(same as "Housing Stability")	N/A	0	
Exit to Permanent Destinations (-1, 0, 1)	Percent of exiting participants who exited to a permanent housing destination or maintained stable housing. ⁷	HMIS Report "NOFO Scoring Tool" FED-10-SAG-238	Tab "Destination at Exit", Percent of Total Leavers	(same as "Housing Stability")	(same as "Housing Stability")	(same as "Housing Stability")	N/A	0	
Maintain or Increase Income From Employment (0, 1, 2)	Percent of all adult participants who's earned income increased or remained the same from entry to exit or follow up. ⁸	HMIS Report "NOFO Scoring Tool" FED-10-SAG-238	Tab "Income" columns Y + Z + AA for "Earned Income" row	(same as "Housing Stability")	(same as "Housing Stability")	(same as "Housing Stability")	N/A	0	
Maintain or Increase Total Income (-1, 1, 2)	Percent of all adult participants who's total income increased or remained the same from entry to exit or follow up. ⁹	HMIS Report "NOFO Scoring Tool" FED-10-SAG-238	Tab "Income" columns Y + Z + AA for "any Income" row	(same as "Housing Stability")	(same as "Housing Stability")	(same as "Housing Stability")	N/A	0	
Return to Homelessness (0, 1, 2)	Percentage of all exited participants with a permanent destination with who reappear in the statewide homeless continuum with a homeless status within 6 months of their exit.	HMIS Report "Returns to Homelessness v2019.2" MIN-00-SAG-054, set 10 later than [2/1/2021] and 183 days for cutoff dates	Tab "Reappearance Summary by Provider" second table for "Perm ONLY", 100% - Reappearance rate for positive points	(same as "Housing Stability")	(same as "Housing Stability")	(same as "Housing Stability")	N/A	0	

Project Performance - Project (Renewal Rapid Re-Housing/ Transitional Housing Projects Only)

Housing Stability (RRH ONLY) (0, 1, 2)	Percent of participants who maintained housing stability within 180 days.	HMIS Report "NOFO Scoring Tool" FED-10-SAG-238	Tab: "LOT in Program" columns F + G	Bottom of "Natural Breaks" among low number of projects	Middle of "Natural Breaks" among low number of projects	Top of "Natural Breaks" among low number of projects	Top	1	
Housing Stability (TH ONLY) (0, 1, 2)	Percent of participants who maintained housing stability within 180 days.	HMIS Report "NOFO Scoring Tool" FED-10-SAG-238	Tab: "LOT in Program" columns F + G	(same as above)	(same as above)	(same as above)	N/A	0	
High Barrier Clients Served (0,1,3)	Percent of all households served with at least one individual with one or more physical or mental health conditions at entry.	HMIS Report "NOFO Scoring Tool" FED-10-SAG-238	Tab "Population Served" Column G, row for total clients	(same as above)	(same as above)	(same as above)	17.0%	1	

Exits to Permanent Destinations⁶ (-1, 0, 1)	Percent of exiting participants who exited to a permanent housing destination or maintained housing. ⁷	HMIS Report "NOFO Scoring Tool" FED-10-SAG-238	Tab "Destination at Exit" Percent Exiting to a Positive Destination	(same as above)	(same as above)	(same as above)	75.6%	0
Maintain or Increase Income from Employment (0, 1, 2)	Percent of all adult participants who's earned income increased or remained the same from entry to exit or follow up.	HMIS Report "NOFO Scoring Tool" FED-10-SAG-238	Tab "Income" columns Y + Z + AA for "Earned Income" row	(same as above)	(same as above)	(same as above)	26.0%	1
Maintain or Increase Total Income (-1, 1, 2)	Percent of all adult participants who's total income increased or remained the same from entry to exit or follow up.	HMIS Report "NOFO Scoring Tool" FED-10-SAG-238	Tab "Income" columns Y + Z + AA for "any Income" row	(same as above)	(same as above)	(same as above)	84.4%	1
Return to Homelessness (0, 1, 2)	Percentage of all exited participants with a permanent destination with who reappear in the statewide homeless continuum with a homeless status within 6 months of their exit.	HMIS Report "Returns to Homelessness 2019.2" MIN-00-SAG-064, set to 7/1/2019 and 183 days for cutoff dates	Tab "Reappearance Summary by Provider" second table for "Perm ONLY", 100% - Reappearance rate for positive points	(same as above)	(same as above)	(same as above)	100%	1
Project Performance - Project dedicated to Serving Target population of Victims of Domestic Violence or Sexual Exploitation Only)								
(0,1)	The Agency has a process for measuring and assessing its ability to ensure the safety of survivors within the project including safety planning and the intake procedures.	FY2022 NOFO Application	"No"		"Yes"		N/A	0
(0,1)	Project has existing special capacity (in its facilities ⁸ , program designs, tools, outreach or methodologies) to serve victims of domestic violence.	FY2022 NOFO Application	"No"		"Yes"		N/A	0
Project Performance - Employment/Volunteerism								
(0,1)	Agency list of active partnerships with employment, educational, and/or training organizations where clients are referred.	FY2022 NOFO Pre-application or NOFO Application	"No"		"Yes"		Yes: Application and 2022 Monitoring	1
(0,1)	Agency described steps to increase volunteer and employment opportunities for target population.	FY2022 NOFO Pre-application or NOFO Application	"No"		"Yes"		Yes: Application and 2022 Monitoring	1
CoC Monitoring (virtual, desk and onsite)								
(0,1)	Project is operating in conformance with CoC standards and Ramsey County contracting requirements, including agency fiscal and project management.	CoC monitoring results	"No"		"Yes"		Yes: 2022 NOFO Monitoring Summary	1
Culturally Competent Services and Racial/Equity								
(0,1)	Training: Agency conducts/ provides cultural competency ⁹ training for all staff at least every three (3) years. Agency's date of last training is within last 3 years.	FY2022 NOFO Pre-application or NOFO Application	"No"		"Yes"		Yes: Q39-40 Pre-App	1
(0,1)	Hiring: Agency describes the efforts to retain and hire staff which is reflective of the demographics of target population being served by the project.	FY2022 NOFO Pre-application or NOFO Application	"No"		"Yes"		Yes: Q41 Pre-App	1
(0,1)	Service Modification: Project adequately identifies specific culturally-based needs of target populations served.	FY2022 NOFO Pre-application or NOFO Application	"No"		"Yes"		Yes:Q42 Pre-App	1
(0,1)	Service Modification and Implementation: Project demonstrates that they modify services and support the cultural needs of target populations.	FY2022 NOFO Pre-application or NOFO Application	"No"		"Yes"		Yes: Q43 Pre-App	1
(0,1)	Racial Equity Training Implementation: Agency described how they have addressed or plan to address racial equity at the agency level (i.e. cultural competency training, staffing and working knowledge that is reflective of the population(s) served).	FY2022 NOFO Pre-application or NOFO Application	"No"		"Yes"		Yes: Q44 Pre App	1

Note: No one can be "above" since one s.d. above is 0.

Coordinated Entry Priority List Team Notes:

Total Score = 30

Project Performance Notes:

Endnotes

- 1 - Cost per permanent housing exit are determined by dividing total project costs by the number of permanent housing exits. These costs can be averaged across all projects within a project type to determine the average cost per permanent housing exit for the community for that project type.
- 2 - Project has funding commitments equal to or exceeding project budget.
- 3 - Financial stability is about building a financial system that can function in good times and bad, and can absorb all the good and bad things that happen in the U.S. economy at any moment; it isn't about preventing failure or stopping people or businesses from making or losing money.
- 4 - Per HUD acceptable organizational audit/financial review means an applicant's audit or financial review does not contain findings or other indications of financial or accounting problems.
- 5 - "[Total Dedicated CH Beds] ÷ [Total Beds]"
- 6- "[total leavers - leavers exiting within 6 months] ÷ total clients]"
- 7 - [leavers exiting to positive destinations ÷ total clients] Positive does not include temporary or "other" destination.
- 8 - 1-(1-adult leavers and stayers who retained earned income category and no change at follow-up/exit as at entry to exit + adult leavers and stayers who retained earned income category and increased at follow-up/exit + adult leavers and stayers who did not have the earned income category and decreased at follow-up/exit)
- 9 - 1-(adult leavers and stayers who retained earned income category and no change at follow-up/exit as at entry to exit + adult leavers and stayers who retained earned income category and increased at follow-up/exit + adult leavers and stayers who did not have the earned income category and decreased at follow-up/exit)
- 10 - Permanent Destinations include the following HMIS exit destinations: Owned by client, no ongoing subsidy; Owned by client, with ongoing subsidy; Rental by client, no ongoing subsidy; Rental by client, VASH subsidy; Rental by client, other ongoing subsidy; PSH for homeless; PSH for family, permanent tenure; Living with friends, permanent tenure; Foster care home or group foster care home; Psychiatric facility; Substance abuse or detox facility; Hospital (non-psychiatric); Deceased;
11. Existing special capacity in facilities to ensure safety includes: enhanced lighting in exterior/interior common areas; secured access to buildings/clients apt. units; on-security, building security protocol, etc.
12. Cultural competence refers to a program's ability to honor and respect those beliefs, interpersonal styles, attitudes and behaviors of the client they serve and the multicultural staff who are providing services.

From: [Desenclos, Joseph E](#)
To: [Desenclos, Joseph E](#)
Subject: 2022 NOFO Projects Rejected-Reduced
Date: Thursday, September 22, 2022 1:59:48 PM

No projects were rejected or reduced in the 2022 NOFO renewal process.

Joseph Desenclos, MPA

Planning and Evaluation Analyst
Office of Research and Evaluation
Health and Wellness Administrative Division
160 East Kellogg Blvd., Suite 9300
St. Paul, MN 55101
(O) 651-266-4209

Desenclos, Joseph E

From: Desenclos, Joseph E
Sent: Tuesday, September 13, 2022 10:43 AM
To: Briana Rutscher; anthony@hearthconnection.org
Cc: Ahmad, Leigh; Gomez, Jerica; Herzfeld, Mark
Subject: 2022 NOFO Annual Renewal Notice:

Importance: High

Tracking:	Recipient	Delivery	Read
	Briana Rutscher		
	anthony@hearthconnection.org		
	Ahmad, Leigh	Delivered: 9/13/2022 10:43 AM	
	Gomez, Jerica	Delivered: 9/13/2022 10:43 AM	
	Herzfeld, Mark	Delivered: 9/13/2022 10:43 AM	Read: 9/13/2022 10:59 AM

Good morning, Briana and Anthony

The CoC Annual NOFO Ranking Committee met yesterday and Ramsey CENS project was ranked in Tier 1. Your Ramsey PSH Combined project was split between Tiers 1 & 2. There was discussion at the meeting regarding the history and amount of unspent or recaptured funds for the PSH Combined project and that is something that I would suggest looking into prior to the next grant cycle.

The committee did approve both of your funding requests:

- Ramsey CENS (\$84,000 – Tier 1)
- Ramsey PSH Combined (\$1,837,696 – Tier 1) and (\$295,624 – Tier 2) for a total of \$2,133,320.00

On behalf of our team, I would like to thank you for your patience in completing all the required documentation, time spent during our monitoring visit this spring, immediate communication, and for your commitment to serving our residents most in need.

If you have any additional questions please let me know. **If not, please respond to this email indicating that you accept this funding award for our records per HUD.**

I hope that you and your staff have a wonderful day!

Sincerely,

Joseph

Joseph Desenclos, MPA
(He, Him, and His)
Planning and Evaluation Analyst
Office of Research and Evaluation

Health and Wellness Administrative Division
160 East Kellogg Blvd., Suite 9300
St. Paul, MN 55101
(O) 651-266-4209



METRO HRA

September 12, 2022

Ramsey County Continuum of Care: Heading Home Ramsey

Re: Letter of Commitment-Stability Vouchers

To Whom It May Concern:

This letter serves as documentation of the Metropolitan Housing and Redevelopment Authority's (Metro HRA) commitment to partner with the Ramsey County Continuum of Care and its providers if awarded Stability Vouchers.

After publishing the Continuum of Care Notice of Funding Opportunity (FR-6500-N-25), HUD also published a Notice (PIH 2022-24), directing interested PHAs to register interest for Stability Vouchers. The Metro HRA intends to register interest for Stability Vouchers in accordance with that notice.

The Metro HRA operates in three separate Continuum of Care (CoC) areas – Ramsey County, Hennepin County and the Suburban Metro Area CoC. If the Metro HRA is awarded Stability Vouchers, we commit to working with all three CoCs to complete new Memorandums of Understanding (MOU) or amend the current MOUs for the Emergency Housing Voucher program. The MOU will memorialize the Metro HRA's commitment to accept Stability Voucher referrals from the three CoC's Coordinated Entry Systems, including the Victim Service Providers and Veteran Service Organizations that refer their clients through Coordinated Entry. This voucher can then serve as a match to any CoC-funded services that are provided to referred Coordinated Entry households.

The Metro HRA looks forward to continuing the close partnership with the CoCs and the Stability Housing Vouchers. If there are any questions, please let me know.

Respectfully Submitted,

A handwritten signature in black ink that reads "Terri Smith".

Terri Smith
Director
Metro HRA



September 6, 2022

To: Ramsey County Continuum of Care: Heading Home Ramsey
Attn: Loni.Aadalen@co.ramsey.mn.us, CoC Coordinator

Re: Letter of Commitment—Stability Vouchers

To Whom It May Concern:

This letter serves as documentation of the St. Paul Public Housing Agency's commitment to partner with the Continuum of Care and its providers if awarded Stability Vouchers.

After publishing the Continuum of Care Notice of Funding Opportunity (FR-6500-N-25), HUD also published a Notice (PIH 2022-24), directing interested PHAs to register that interest for Stability Vouchers. The St. Paul PHA intends to register their interest for Stability Vouchers in accordance with that notice.

If the PHA is awarded Stability Vouchers, we commit to working with the Ramsey County Continuum of Care (Heading Home Ramsey) to complete a Memorandum of Understanding. This MoU would memorialize the agency's commitment to accept all referrals for the Stability Vouchers from Heading Home Ramsey (HHR), including the Victim Service Providers and Veteran Service Organizations that refer their clients through HHR's Coordinated Entry. This voucher can then serve as a match to any CoC-funded services that are provided to referred Coordinated Entry households.

The PHA is eager to begin administering vouchers in this additional partnership with our Continuum of Care: Heading Home Ramsey. If there are any questions, please let us know.

Sincerely,

Dominic Mitchell
HCV Programs Director
St. Paul Public Housing Agency
Dominic.mitchell@stpha.org



September 1, 2022

To: Ramsey County Continuum of Care: Heading Home Ramsey
Attn: Loni.Aadalen@co.ramsey.mn.us, CoC Coordinator

Re: Letter of Commitment—Move-Up Program

To Whom It May Concern:

This letter serves as documentation of the St. Paul Public Housing Agency's commitment to continue partnering with Heading Home Ramsey to transition existing PSH clients into Housing Choice Vouchers through the Move-Up (HUD Move On) Program.

On May 27, 2020, the PHA's Board of Commissioners approved a limited preference to their Housing Choice Voucher Admission and Occupancy Policies, where formerly homeless clients who are current residents of Permanent Supportive Housing (PSH) can be referred by the Continuum of Care for a "Move-Up" voucher. The Board of Commissioners agreed to reserve up to 100 vouchers for this purpose. Forty referrals have been processed through this program to date, and the PHA and CoC are currently soliciting additional referrals.

The Board Report and the policy language are attached. If there are any questions, please let us know.

Sincerely,

Dominic Mitchell
HCV Programs Director
St. Paul Public Housing Agency
Dominic.mitchell@stpha.org

Enclosure: Move-Up Board Report, dated May 27, 2020
Appendix H; St. Paul PHA's Housing Choice Voucher Admission and Occupancy Policy

PUBLIC HOUSING AGENCY OF THE CITY OF SAINT PAUL

REPORT TO COMMISSIONERS

APPROVED

**FROM JON M. GUTZMANN
EXECUTIVE DIRECTOR**

REGARDING Section 8 Housing Choice Voucher Program;
Limited Preference for "Move-Up" Program

DATE May 27, 2020

Staff requests Board approval of Resolution No. 20-5/27-04 to create a limited preference in the Section 8 Housing Choice Voucher (HCV) Program for up to 100 formerly homeless individuals and families, who are currently served in Permanent Supportive Housing (PSH) units through the Ramsey County Continuum of Care. Eligible individuals and families will transition or "move up" from Permanent Supportive Housing into a regular voucher, thereby opening up that PSH opportunity for other homeless individuals and families in greater need. This is a follow-up to a presentation by staff at the January meeting of the Board of Commissioners.

Through the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act, HUD consolidated a number of homeless response programs into local "Continuum of Care" (CoC) programs, which are responsible for coordinating federal and local funding streams and other resources to work toward ending homelessness in their respective regions. In Ramsey the County Continuum of Care is called "Heading Home Ramsey" (HHR); and it is a community-wide partnership committed to the goal of ending homelessness in the cities and neighborhoods of Ramsey County. The partnership includes social service providers, housing providers, philanthropic partners, and business, community and government members, including the PHA.

Each CoC annually competes for funding through a Notice of Funding Availability (NOFA) issued by HUD. Each application is scored on the local CoC's efforts and progress toward ending homelessness in their region. Any funds received go toward additional resources for the region,

both to directly assist in the costs of housing the homeless, as well as costs to innovate toward general system improvement.

Heading Home Ramsey (HHR) approached both the PHA and the neighboring Metro HRA (whose Section 8 Program covers the rest of Ramsey County) about adopting a “Move-Up” preference for eligible applicants. HHR currently has a long wait for the approximately 2,700 Permanent Supportive Housing (PSH) “beds” they support. Approximately 1,170 individual clients and client families are on the priority list waiting for a Permanent Supportive Housing opening, and they cannot be housed until vacancies open up.

Heading Home Ramsey estimates that at least 300 of those households currently housed in PSH are individuals or families who no longer need the services associated with their current housing. Though these clients have met their supportive housing goals and have low supportive service needs, they may be staying on in PSH because they need the rental subsidy provided there. To that end, HHR asked the PHA to consider providing “Move-Up” vouchers from our regular HCV allocation, to pay the rental subsidy when an individual or family may no longer need the supportive services in PSH. This would, in turn, open up the supportive housing unit behind them, which then would be filled by a homeless client from the CoC’s priority list. Metro HRA has committed 40 vouchers annually to this initiative metro wide, including 13 in suburban Ramsey County. The Minneapolis Public Housing Authority has committed 30 vouchers annually to this initiative in Hennepin County.

Rather than committing an annual renewable amount of vouchers as neighboring agencies have, staff are recommending that the PHA provide 100 vouchers that would be phased in over time,

and refilled upon attrition. This process aligns with how we issue VASH¹ and FUP² vouchers, which go only to families/individuals referred by the partner agencies (VA Medical Center and Ramsey County). Heading Home Ramsey would coordinate and provide referrals for these vouchers in Ramsey County through their funded partners and projects.

Heading Home Ramsey has proposed that the initial applicant criteria include that the family/individual must have resided in Permanent Supportive Housing for a minimum of two years. They also intend to measure the family's readiness for the voucher by assessing their compliance in a number of different areas, including paying rent on time and in full for the past twelve months, and ensuring a connection to some level of community or mainstream resources to help ensure their ongoing success. The Assessment Tool for this program is attached. Staff are recommending an additional requirement that a family/individual who requires a new housing placement (moving out of the PSH unit) will receive housing search assistance from the referring CoC/PSH partner.

With these measures in place, staff believe this will be a successful way to transition formerly homeless clients into the HCV program, continuing their housing assistance and reducing their risk of future homelessness. The PHA would also be fulfilling an important role as a key partner in local efforts to reduce or end homelessness by providing the valuable rental subsidy, which would open up opportunities for higher-need homeless clients in the continuum. The housing search assistance element would also aid in maintaining full voucher utilization in a period of low rental vacancy, while attracting and retaining new landlords.

¹ Veterans Affairs Supportive Housing

² Family Unification Program

Though this is a new CoC and PHA innovation encouraged by HUD, there are parallels to the Project-Based Vouchers (PBVs) that the PHA already administers. In the majority of our PBV projects, providers are already required to house homeless clients from the CoC/HHR priority lists in their projects. The federal regulations dictate that after one year, regardless of whether the PBV residents have met their program or service objectives, the PHA must offer that family a regular Housing Choice Voucher to move out of the PBV project. Those "mobility" vouchers take priority over issuing HCVs to applicants on the waiting list.

If approved by the Board, this limited Move-Up preference would not affect the number of HCVs that the PHA can offer for PBV use. The recommended preference would only create a priority for issuing a limited number of available HCVs (tenant-based vouchers) to households moving out ("graduating") from permanent supportive housing.

This "Move-Up" preference would also help the PHA maintaining full utilization of the available Housing Choice Vouchers, since many eligible families are likely to be remain in their current units, without having to "shop" for a new unit. Additionally, whether a family needs to move from their current housing or not, the "Move-Up" preference would allow the PHA to assist families who are most likely to succeed on the HCV program and remain stably housed.

DJM

Attachments: Resolution No. 20-5/27-04
Proposed Amendments: Part Two: Applicant Selection
Appendix H-Special Programs
Move-Up Assessment Tool

PUBLIC HOUSING AGENCY OF THE CITY OF SAINT PAUL

RESOLUTION NO. 20-5/27-04

**CREATION OF HOUSING CHOICE VOUCHER PREFERENCE FOR "MOVE-UP"
APPLICANTS; SET-ASIDE FOR 100 APPLICANTS**

WHEREAS, the Public Housing Agency of the City of Saint Paul (PHA) has provided decent, safe and sanitary housing for families pursuant to Section 8 of the United States Housing Act of 1937, as amended (42 USC 1437, et seq.); and

WHEREAS, the PHA currently administers a combined Section 8 Housing Choice Voucher Program in the total of 4,884 housing opportunities; and

WHEREAS, the Saint Paul City Council authorized the PHA to provide housing in the City of Saint Paul in conformance with the approved Saint Paul Consolidated Plan; and

WHEREAS, HUD regulations allow local housing agencies to set preferences for how vouchers should be assigned to families on the waiting list; and

WHEREAS, staff has recommended assisting the local Continuum of Care in providing housing opportunities to the Continuum, by establishing a limited preference to provide 100 families who currently reside in Permanent Supportive Housing with the opportunity for a Housing Choice Voucher; and

WHEREAS, staff has recommended the attached policy revisions to complete this goal; and

WHEREAS, the Board is interested in working with local community partners to form solutions that address community needs, including efficient and effective collaboration to reduce homelessness, as indicated in the Agency Goals; and

WHEREAS, the Board finds that the recommended policy revision is appropriate to the administration of the Housing Choice Voucher Program.

NOW THEREFORE BE IT RESOLVED by the Board of Commissioners of the PHA as follows:

1. The Admission and Occupancy Policies for the HCV Programs is revised as shown in the attached policies, establishing a limited preference for 100 families who currently reside in Permanent Supportive Housing; and
2. The policy shall be effective immediately upon approval by the Board.

APPENDIX H SPECIAL ALLOCATIONS

I. OVERVIEW

At times the PHA receives limited allocations of Section 8 Vouchers for specific groups of families needing rent assistance.

Eligible Applicants: Except as specified in a particular NOFA or grant award, an applicant must meet the Section 8 eligibility requirements as well as qualify under the specific guidelines for the special program. *(See Part 1 of the Section 8 Admission and Occupancy Policies for additional guidance on Section 8 eligibility requirements.)*

- A. Applicants for the Family Unification Program (FUP)** must be referred by Ramsey County Community Human Services Department.
- B. Applications for the Mainstream Program:** Eligible applications are taken from the regular Section 8 waiting list according to established waiting list policies.
- C. Applicants for Veterans Administration – Supportive Housing (VASH) Program** vouchers must be referred by the Veterans Administration.
- D. Section 811 Project-Based Rental Assistance (PBRA) Demonstration:** Eligible applicants are households on the regular Section 8 waiting list whose head, spouse or sole member is a non-elderly person with a disability.
- E. Applications for the Mainstream Preference (Non-Elderly Disabled)** must be referred by one of the PHA's qualified partnering agencies.
- F. Applications for the Move-Up Preference** must be referred by the Ramsey County Continuum of Care.
- G. Applications for the Emergency Housing Voucher (EHV) Program** must be referred by the Ramsey County Continuum of Care, except as noted below.

II. SPECIAL PROGRAMS

- A. Family Unification Program (FUP):** The PHA has a special allocation of FUP Vouchers that it uses in compliance with HUD requirements for the program.
 - a. A FUP-Eligible Family is defined as a family that the Public Child Welfare Agency (PCWA) has certified as a family for whom the lack of adequate

housing is a primary factor in the imminent placement of the family's child, or children, in/out-of-home care, or in the delay of discharge of a child, or children, to the family from out-of-home care, and that the PHA has determined is eligible for a Housing Choice Voucher (HCV). Referrals for these vouchers come from Ramsey County Child Protection.

- b. A FUP-Eligible Youth is defined as a youth that the PCWA has certified to be at least 18 years old, and not more than 24 years of age, and who has left foster care, or will leave foster care within 90 days, in accordance with a transition plan described in section 475(5)(H) of the Social Security Act, and is homeless or is at risk of becoming homeless at age 16 or older. Referrals for these vouchers come from Ramsey County Coordinated Entry (Continuum of Care).

- 1. The family or youth must meet the income and FUP eligibility requirements for Section 8 Rent Assistance as determined by the St. Paul Public Housing Agency (PHA). There are no required unit sizes of Vouchers or households for this program. A Voucher will be issued based on the PHA subsidy standards and individual needs of the family or youth.

- a) Annual family income must be under the limits as shown on page 1-5 of Part One of the Section 8 Admission and Occupancy Policies.

- 2. Affirmatively Furthering Fair Housing. The PHA will take reasonable steps to affirmatively further fair housing in regards to FUP vouchers. Reasonable steps will include:

- a) To the extent practicable, identifying and ensuring certification of FUP eligible families and youth that may be on the PHA's waiting list and ensuring that the youth maintain their original position on the waiting list after certification.
 - b) Appropriately placing all FUP eligible families and youth referred from the PCWA and/or Coordinated Entry/Continuum of Care/COC on the HCV waiting list in order of first come, first served.
 - c) Informing applicants on how to file a fair housing complaint including the provision of the toll free number for the Housing Discrimination Hotline: 1-800-669-9777.
 - d) The PHA will also comply with the affirmatively furthering fair housing requirements of 24 CFR Section 903.7(o).

B. Mainstream Program/Disability Vouchers: The PHA has a special allocation of Vouchers to assist families whose Head, spouse or sole member is a person with a disability.

1. The PHA encourages participants in the Mainstream Program or Disability Voucher Program to use HousingLink's online database and search tools to locate accessible units where vouchers are accepted. To the extent possible, the PHA will offer referrals to public and private funding sources that may be able to assist with apartment modification expenses.
2. When the PHA is drawing names from its waiting list, a family who is determined to be eligible for a Housing Choice Voucher (HCV) and whose head, spouse, or sole member is a person with a disability, will be issued a Mainstream/Disability voucher, if one is available.
3. When the PHA is not drawing names from its waiting list due to overutilization of regular HCVs or insufficient funding for them, if a Mainstream/Disability voucher becomes available the PHA may assign that voucher to an eligible family who is currently assisted with a regular HCV and who was originally drawn from the regular voucher waiting list. This procedure will maximize utilization of the special purpose vouchers.

C. Veterans Administration – Supportive Housing (VASH) Program: The PHA has a special allocation of VASH vouchers to provide assistance to homeless veterans.

1. Applicants for VASH vouchers must be referred by the Veterans Administration.
2. Annual family income must be under the limits as shown in Part One of the Section 8 Admission and Occupancy Policies.
3. There are no required unit sizes of Vouchers or households for this program. A Voucher will be issued based on the PHA subsidy standards and individual needs of the family.
4. As required by HUD rules, VASH applicants will not be screened for housing history or criminal history, except to determine if an applicant is subject to a lifetime registration requirement as a sex offender. Such persons are not eligible for VASH vouchers.
5. The PHA will give priority to an initial inspection of a unit selected by a new recipient of a VASH voucher.

D. Section 811 Project Rental Assistance (PRA) Demonstration: To support Minnesota Housing's Section 811 PRA Demonstration program (a special grant from HUD to Minnesota Housing), the PHA committed up to 30 Housing Choice Vouchers from its current allocation, to be issued to eligible households on the regular HCV waiting list whose head, spouse or sole member is a non-elderly person with a disability.

1. To issue and lease up the set aside of 30 HCVs from the next 100 issued and leased up from the waiting list, those households may be given priority over other applicants on the waiting list beginning November 1, 2015. This is a one-time commitment; the priority for admission will end after the 30 HCVs have been leased up.
2. Upon turnover those 30 HCVs will be returned to the general pool, to be re-issued to another family on the waiting list or in PBV-assisted housing when the PHA is issuing vouchers.
3. The PHA will follow all of the rules and guidelines contained in the Section 811 program's regulations, Notice of Funding Availability (NOFA) and other HUD guidance, including but not limited to eligibility, applicant selection, affirmatively furthering fair housing, and other requirements.

E. Mainstream Preference (Non-Elderly Disabled): The PHA has committed 50 vouchers for non-elderly disabled families that have been referred to the PHA by one of the identified partners to participate in a Mainstream supportive housing program. The household must include a non-elderly disabled person; the identification of this individual is not limited to Head of Household.

1. Applicants for Mainstream vouchers must be referred by one of the PHA's pre-qualified identified partners.
2. The referring partner must certify that the individual/family is either:
 - i. Currently in institutional or segregated settings, and want to move to community settings; or
 - ii. At risk of becoming institutionalized; or
 - iii. Currently homeless, or at risk of becoming homeless.
3. There are no required unit sizes of Vouchers or households for this program. A Voucher will be issued based on the PHA subsidy standards and individual needs of the family.
4. These households are allowed to port-out without the required year of residency.

F. Move-Up Preference: The PHA has committed up to 100 vouchers for families that have been referred to the PHA by the Ramsey County Continuum of Care. These individuals and families will be ready to transition or "move up" from Permanent Supportive Housing (PSH) units. These are families that were homeless prior to entry into the PSH program, and who continue to need a rental subsidy but no longer require intensive supportive services. Eligible families will have completed a supportive housing program within Ramsey County in good standing, and will receive a voucher to preserve their rental assistance.

1. Applicants for Move-Up Vouchers must be referred by the Ramsey County Continuum of Care.

2. The referring partner must certify:
 - i. That the family has successfully completed the respective supportive housing program.
 - ii. That if the family will not be housed in their current subsidized unit, the family will receive assistance in placing their voucher upon initial voucher receipt.
 - iii. That, upon successful transfer to the Housing Choice Voucher program, the Permanent Supportive Housing program placement, previously occupied by the applicant family, will be filled by a homeless family in need of supportive services.
3. There are no required unit sizes of Vouchers or households for this program. A Voucher will be issued based on the PHA subsidy standards and individual needs of the family.
4. The PHA will request referrals at their discretion, as vouchers are available.

G. Emergency Housing Vouchers (EHV). HUD awarded the PHA Emergency Housing Vouchers, designated for specific eligible families/individuals that have been referred by the Continuum of Care (CoC), and determined to be:

1. Homeless;
2. At risk of homelessness;
3. Fleeing or Attempting to Flee, domestic violence, dating violence, sexual assault, stalking or human trafficking; or
4. Recently homeless and for whom rental assistance will prevent the family's homelessness or having high risk of housing instability.

The Program will be governed by all applicable HUD requirements, in addition to a Memorandum of Understanding between the PHA and the CoC. To the extent there is any conflict between this policy and HUD requirements, the HUD requirements control.

1. The PHA must accept all referrals for these vouchers from Coordinated Entry (as determined by the CoC)., The CoC will provided documentation verifying eligibility, and this must be retained in the tenant file. If there are insufficient referrals from the Coordinated Entry system, the PHA may accept referrals from other sources.

2. The PHA will identify EHV referrals/applicants separately on their waiting list to ensure they are immediately processed upon referral.
3. The PHA will not issue local preferences for these vouchers. All families and individuals will be able to port (move) out of the PHA's jurisdiction with their EHV voucher immediately.
4. In accordance with HUD requirements for these vouchers, the PHA may only deny applicants an EHV for the following reasons:
 - a. If any family or individual is over the Very-Low-Income limit.
 - b. If any family or individual fails to sign and submit consent forms for obtaining information in accordance with 24 CFR Part 5.
 - c. If any household member has ever been convicted of drug-related criminal activity for manufacture or production of methamphetamine on the premises of federally assisted housing.
 - d. If any household member is subject to a lifetime registration requirement under a sex offender registration program.
 - e. On a case-by-case basis and after consideration of all mitigating circumstances, if any household member is currently engaged in, or has engaged in violent criminal activity or other criminal activity which may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents or persons residing in the immediate vicinity, within the previous twelve months.
 - f. On a case-by-case basis and after consideration of all mitigating circumstances, if any member of the family has committed fraud, bribery, or any other corrupt or criminal act in connection with any Federal housing program within the previous twelve months.
 - g. On a case-by-case basis and after consideration of all mitigating circumstances, if any member of the family has engaged in or threatened abusive or violent behavior toward PHA personnel within the previous twelve months.
5. Upon issuance of the vouchers, families and individuals will be eligible to receive an additional 60 days of shopping time, for a total of 120 days of initial shopping time.

While funds are available, the PHA will reimburse supportive service partners for the PHA's EHV up to \$3,500 per leased/assisted family/individual (referred to the St. Paul PHA from the CoC) for the following supportive services upon adequate demonstration of lease-up in an eligible unit:

1. Housing Search Assistance. This must include, at a minimum: (1) helping individual families identify potentially available units during their housing search, including physically accessible units with features for family members with disabilities, as well as units in low-poverty neighborhoods, (2) providing transportation assistance and directions to potential units, (3) conducting owner outreach, (4) assisting with the completion of rental applications and PHA forms, and (5) helping expedite the EHV leasing process for the family.
2. Direct Assistance, including:
 - a. Security Deposits;
 - b. Application Fees;
 - c. Utility Deposit Assistance;
 - d. Resources for Moving Assistance;
 - e. Credit Counseling;
 - f. Essential Household Items;
 - g. Renter's Insurance;
 - h. Other expenses explicitly authorized by HUD guidance.

September 19, 2022

To: Saint Paul Public Housing Authority

Attn: Dominic Mitchell – Director, Saint Paul Public Housing Authority (PHA)

Re: Letter of Commitment for Stability Vouchers—Saint Paul PHA

From: Leigh Ann Ahmad- Continuum of Care Coordinator

To Whom It May Concern,

The Ramsey County Continuum of Care, Heading Home Ramsey, is proud to work with the St. Paul Public Housing Agency in its application for Stability Vouchers. This partnership would build upon an existing relationship that has already found success stabilizing several households with Emergency Housing Vouchers.

Specifically, if/when the St. Paul Public Housing Agency receives an award of Stability Vouchers, Heading Home Ramsey is committing to drafting a Memorandum of Understanding with the St. Paul Public Housing Agency that ensures:

- 1) Eligible families are referred to the PHA through Coordinated Entry for the Stability Vouchers,
- 2) CoC-funded supportive services are paired with Stability Vouchers, and
- 3) Stakeholder collaboration to develop a prioritization plan for the Stability Vouchers.

Heading Home Ramsey's Coordinated Entry list includes victims of domestic violence and veterans, and we regularly collaborate with Victim Service Providers and Veteran Service Organizations. This effort will be similar to the process we underwent upon receipt of the Emergency Housing Vouchers.

If there are any questions, please reach out to Leigh Ann Ahmad with the Ramsey County Continuum of Care (leigh.ahmad@co.ramsey.mn.us) or Dominic Mitchell at the St. Paul Public Housing Agency (Dominic.mitchell@stpha.org).

Sincerely,



Keith A. Lattimore

Director, Housing Stability Department

September 19, 2022

To: Metropolitan Council Housing and Redevelopment Authority

Attn: Terri Smith – Director, Metropolitan Council Housing and Redevelopment Authority

Re: Letter of Commitment for Stability Vouchers—Metro HRA

From: Leigh Ann Ahmad- Continuum of Care Coordinator, Leigh.Ahmad@CO.RAMSEY.MN.US

To Whom It May Concern,

The Ramsey County Continuum of Care, Heading Home Ramsey, is proud to work with the Metropolitan Council Housing and Redevelopment Authority (Metro HRA) in its application for Stability Vouchers. This partnership would build upon an existing relationship that has already found success stabilizing households with Emergency Housing and Mainstream Vouchers.

Specifically, if/when the Metro HRA receives an award of Stability Vouchers, Heading Home Ramsey is committing to drafting a new Memorandum of Understanding or Amend the existing MOU with the Metro HRA that ensures:

- 1) Eligible families are referred to the PHA/HRA through Coordinated Entry for the Stability Vouchers,
- 2) CoC-funded supportive services are paired with Stability Vouchers, and
- 3) Stakeholder collaboration to develop a prioritization plan for the Stability Vouchers.

Heading Home Ramsey's Coordinated Entry list includes victims of domestic violence and veterans, and we regularly collaborate with Victim Service Providers and Veteran Service Organizations. This effort will be similar to the process we underwent upon receipt of the Emergency Housing Vouchers.

If there are any questions, please reach out to Leigh Ann Ahmad with the Ramsey County Continuum of Care (leigh.ahmad@co.ramsey.mn.us) or Terri Smith at Metropolitan Housing and Redevelopment Authority (terri.smith@metc.state.mn.us).

Sincerely,



Keith A. Lattimore

Director, Housing Stability Department

3A-2a. Healthcare Formal Agreements



CATHOLIC CHARITIES
of St. Paul and Minneapolis

341 Chester Street
St. Paul, MN 55107
612-204-8500
cctwincities.org

September 13, 2022
Re: Letter of Commitment

To whom it may concern:

This letter serves as documentation of the ongoing collaboration between Heading Home Ramsey and Catholic Charities of St. Paul and Minneapolis. Catholic Charities is recognized as a leader in serving the most vulnerable populations, creating opportunity, and advocating for justice in the community. We have over 150 years of experience working across homeless response systems in Minnesota. We are a primary provider of emergency shelter, housing, and supportive services for single adults, families, and youth experiencing homelessness or at risk of becoming homeless.

Catholic Charities will be providing Coordinated Entry Services, Rapid Rehousing, Permanent Supportive Housing, and case management to families and individuals experiencing homelessness in Ramsey County. Additionally, we will provide Coordinated Entry Services to single adults experiencing unsheltered homelessness in Ramsey County. For this project, Ramsey County is providing the match dollars.

Many of the individuals served through these programs receive health care services at our daytime drop-in center called St. Paul Opportunity Center (SPOC). Among the MOUs with health care providers serving these individuals:

RADIAS Health – Mental health care services
Westside Community Health Services
People Incorporated – Care coordination and diagnostic assessments
GUILD Services – Mental health care service

Services are currently being provided and we anticipate them to continue throughout the full terms of each project from 2022 – 2026. Catholic Charities will continue in this collaborative work alongside Ramsey County during fiscal years 2022 – 2026.

Sincerely,

Margaret King

Margaret King
Catholic Charities of St. Paul and Minneapolis
margaret.king@cctwincities.org

PERSONAL SERVICES AGREEMENT
(Community Nursing Services)

EFFECTIVE DATE: July 21, 2022

PARTIES:

Ramsey County Housing Stability Department (“County”)

Fairview Health Services (“Fairview”)

RECITALS

A. Fairview is a tax-exempt organization within the meaning of Section 501(c)(3) of the Internal Revenue Code and an integrated system comprised of hospitals, clinics and other facilities.

B. County is a county operated housing stability department, serving all cities within Ramsey County, Minnesota and partners with healthcare providers to advance health equity and reduce barriers to care within the shelters or transitional housing County operates.

C. Fairview has received grant funding and desires to partner with County to provide services to shelter or transitional housing residents, as set forth in this Agreement.

NOW THEREFORE, in consideration of the obligations contained herein, the parties agree as follows:

ARTICLE 1
Responsibilities of Fairview

1.1 Provision of Services. Commencing on the Effective Date or such later date mutually agreed upon by the parties (“**Commencement Date**”), Fairview shall provide, through its employed registered nurses, the services set forth in Exhibit A of this Agreement, which is incorporated herein by reference (“**Services**”) at the **Service Site(s)** set forth in Exhibit A. The registered nurses shall be referred to as “**Providers**.” The Services will be provided in accordance with industry practice and standards of care. Fairview will supervise its employees providing Services.

1.2 Records. All Providers shall keep and maintain (or cause to be kept and

convicted of any crime punishable as a felony involving moral turpitude, immoral conduct or fraud; and (iii) never having been expelled, suspended or disciplined with regard to his or her professional practice, occurring as a final action of any professional organization.

1.4 Fairview Insurance. Fairview shall obtain and keep in force medical malpractice insurance for the Providers with limits of liability as are reasonable and customary for risks incident to Fairview's obligations under this Agreement. Such insurance coverage shall be obtained through reliable insurance companies or as part of a self-funded plan and Fairview shall act promptly to restore proper insurance coverage upon any termination, cancellation, lapse or any other material change in such insurance coverage. Fairview shall provide a certificate or proof of insurance upon written request. The provisions of this section shall survive the termination of this Agreement with respect to any claim, action, or proceeding relating to actions or omissions alleged to have occurred during the term of this Agreement.

1.5 Workers' Compensation Insurance. Fairview certifies it is in compliance with Minnesota Statutes, Ch 176 (Workers' Compensation). Fairview's employees, subcontractors and agents will not be considered County employees. Fairview must provide Workers' Compensation insurance for all its employees and, in case any work is subcontracted, Fairview will require the subcontractor to provide Workers' Compensation insurance in accordance with the statutory requirements of the State of Minnesota. Required minimum limits of \$500,000/\$500,000/\$500,000. Any claims that may arise under Minnesota Statutes Ch. 176 on behalf of these employees, subcontractors or agents and any claims made by any third party as a consequence of any act or omission on the part of these employees, subcontractors or agents are in no way the County's obligation or responsibility. WC policy includes Alternate Employer Endorsement listing Ramsey County as the Alternate Employer for all work performed under this contract.

If Minnesota Statute 176.041 exempts Fairview from Workers' Compensation insurance or if the Contractor has no employees in the State of Minnesota, Fairview must provide a written statement, signed by an authorized representative, indicating the qualifying exemption that excludes Fairview from the Minnesota Workers' Compensation requirements. If during the course of the contract the Fairview becomes eligible for Workers' Compensation, Fairview must comply with the Workers' Compensation Insurance requirements herein and provide the County with a certificate of insurance.

1.6 Cooperation. Fairview and County agree that County's employees, agents, and subcontractors, as applicable, and Fairview's Providers shall act in a courteous and respectful manner toward all patients, family members, employees, volunteers and others. Fairview shall cooperate fully with County in the investigation and resolution of complaints from patients, family members, volunteers and employees and the parties shall coordinate with each other concerning

2.1 County's Obligations and Representations. County shall provide and maintain (or cause to be provided and maintained) such as reasonably necessary for the Providers to perform the Services. County represents and warrants that it is not excluded or suspended from participation in any federal or state health care program, including the Medicare and Medicaid programs, nor debarred from contracting with any state or federal government. County shall notify Fairview immediately upon County's debarment, suspension, or exclusion from Medicare, Medicaid, or other governmental program, and Fairview shall have the right to terminate this Agreement immediately upon such notice.

2.2 County Insurance. County shall obtain and keep in force general liability and other applicable insurance coverage covering County, its employees, and as applicable, its agents, and volunteers, with limits of liability as are reasonable and customary for risks incident to County's obligations under this Agreement. Such insurance coverage shall be obtained through reliable insurance companies or as part of a self-funded plan and County shall act promptly to restore proper insurance coverage upon any termination, cancellation, lapse or any other material change in such insurance coverage. County shall provide a certificate or proof of insurance upon written request. County shall notify Fairview promptly of any actual or threatened claim, action, suit or proceeding related to activities undertaken pursuant to this Agreement and shall cooperate in all respects with Fairview in the defense of any such claim, action, suit or proceeding. The provisions of this section shall survive the termination of this Agreement with respect to any claim, action, or proceeding relating to actions or omissions alleged to have occurred during the term of this Agreement.

ARTICLE 3 Confidentiality

3.1 Confidentiality of Patient Records. . The parties will comply with all applicable state and federal laws and regulations regarding confidentiality of patient records including, but not limited to, the Health Insurance and Portability and Accountability Act of 1996 ("HIPAA"), as amended by the Health Information Technology for Economic and Clinical Health Act ("HITECH"), and the Minnesota Health Records Act. No Protected Health Information, as defined by HIPAA, or not public information, as defined by the Minnesota Government Data Practice Act, will not be exchanged, released, disclosed, or published to any party without the consent of the data subject unless required or permitted under applicable laws. To the extent that additional legal and regulatory requirements regarding the confidentiality and security of patient records are enacted, the parties shall amend this Agreement as necessary and cooperate to achieve compliance with such requirements.

ARTICLE 4

Indemnification

Each party shall be responsible for its own acts or omissions in the performance of this Services Agreement. Accordingly, neither party shall be responsible for the acts or omissions of the other party in connection with this Service Agreement. The County's liability is governed by the Municipal Tort Claims Act, Minn. Stat. Ch. 466 and other applicable laws.

ARTICLE 6

Term & Termination

6.1 Term. The term of this Agreement shall be from the Effective Date through December 31, 2024, unless terminated as provided herein.

6.2 Termination. This Agreement may be terminated as follows:

6.2.1 Without Cause. This Agreement may be terminated by either party without cause, upon thirty (30) days prior written notice.

6.2.2 With Cause. If a party is in material default of this Agreement, the non-defaulting party may give written notice of the default to the defaulting party. If the defaulting party fails to cure such default within thirty (30) days of receipt of notice, then the non-defaulting party may terminate this Agreement immediately.

6.2.3 Bankruptcy; Insolvency; Insurance. Upon the bankruptcy, insolvency, or dissolution of a party to this Agreement, or the failure of a party to maintain their insurance obligations as described herein, the other party may terminate this Agreement immediately.

6.2.4 Loss of Funding. In the event that sufficient funding is not appropriated under the Grant (as defined below) to perform the Service, or upon discontinuation of the Grant, Fairview may terminate this Agreement by providing written notice to the County specifying the date of termination.

6.2.5 Program Change. In the event that County needs to close or change its shelters/transitional housing listed in Exhibit A, County may terminate this Agreement by providing written notice to Fairview specifying the date of termination.

Services and subject matter herein and all prior understandings between the parties with respect to the Services and subject matter herein are superseded by this Agreement. This Agreement may be amended only upon the mutual written consent of the parties.

8.2 Independent Contractors; Taxes. Fairview and the Providers are at all times serving as an independent contractor to County. Neither party is authorized to act as an agent for or incur obligations on behalf of the other party. County shall not treat Fairview or the Providers as employees for any reason, including, but not limited to, the Federal Unemployment Tax Act, the Social Security Act, the Workers' Compensation Act and any federal or state income tax laws or regulations mandating the withholding of income taxes at the source of compensation payment. Fairview is solely responsible for payment of all benefits and applicable federal and state income taxes for Providers.

8.3 No Third-Party Beneficiaries. The parties agree that the terms of this Agreement apply only to themselves and are not for the benefit of any third-party beneficiaries.

8.4 No Waiver; Remedies. The waiver by either party of a breach or violation of any provision of this Agreement shall not operate as or be construed as a waiver of any subsequent breach or violation of the same or any other provision herein. All of the rights and remedies provided herein are cumulative and additional to any rights or remedies the parties may have at law.

8.5 Governing Law; Venue. This Agreement shall be construed under the laws of the State of Minnesota without giving effect to its conflicts of law provisions. Any lawsuit, action or proceedings with respect to this Agreement must be brought in the State of Minnesota.

8.6 Binding Effect; Assignment. This Agreement is binding upon and enforceable against the parties and their respective successors and assigns. Neither party may assign or delegate any of its rights or obligations under this Agreement without prior written consent of the other party. Notwithstanding the foregoing, Fairview may assign this Agreement to any affiliate or any other entity that controls, is controlled by, or is under common control with Fairview without consent.

8.7 Facsimile Signatures; Counterparts. This Agreement may be signed in separate counterparts and delivered by hard copy, facsimile scanned .pdf copies, through DocuSign, and all such counterparts together constitute a single agreement.

8.8 Authorization. Each person signing this Agreement has the authority to bind their respective party to the terms and conditions of this Agreement and this Agreement will be enforceable as to each party represented.

immediately upon notice in writing to the other party. Any ambiguity in this Agreement shall be interpreted in such a manner to remain valid to the fullest possible extent under the law.

8.10 Notices. Any notices or other communications required or permitted under this Agreement shall be in writing and shall be deemed given if delivered personally (including by recognized courier), by e-mail and receipt is acknowledged, or if sent by registered or certified mail, to the party at the address(es) or email(s) as set forth below or as a party may hereafter designate by written notice. Notice given by US mail is effective on the date of mailing. Notices shall be provided to:

For Fairview:

Fairview Health Services
ATTN: Legal Department
2450 Riverside Ave.
Minneapolis, MN 55454
DCORPLEGAL@Fairview.org

For County:

Ramsey County Housing Stability
Attn: Kim Cleminson
121 E 7th Pl., Suite 420
St. Paul, MN 55101

8.11 Access to Records. Both parties agree to keep and maintain records on the Services provided as may be required by fiscal intermediaries, federal, state, or local governmental agencies, accreditation agencies or other parties.

8.12 Compliance with Fraud and Abuse Laws. Each party represents and warrants that, in performing its obligations hereunder, it shall ensure that it acts in full compliance with all federal and state laws and regulations regarding fraud and abuse, including, without limitation, the Federal Anti-Kickback Statute, the Stark Law, and the False Claims Act and Minnesota False Claims Act.

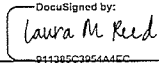
8.14 Force Majeure. Neither party shall be responsible for any failure to perform any obligation under this Agreement due to acts of God, strikes, disasters, acts or orders of government, pandemic, or other similar significant disturbances beyond the control of such party. A party subject to such an act of force majeure shall use its best efforts to carry out its obligations under this Agreement and to mitigate any resulting damages. Any such delays or need to modify the Services as a result of an act of force majeure shall not constitute a breach of this Agreement.

8.15 Non-Exclusive. This Agreement is not intended to be an exclusive arrangement between the parties hereto and each party is free to enter into agreements with other third parties for the same or similar services.

[Signature Page to Service Agreement (Community Nursing Services)]


IN WITNESS THEREOF, the parties have executed this Agreement through their duly authorized representatives.

FAIRVIEW HEALTH SERVICES

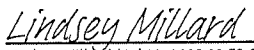
Sign: 
Name: Laura M Reed
Title: COO and CNE

Fairview Health Services
Attn: Legal Dept
2450 Riverside Avenue
Minneapolis, MN 55454

COUNTY

Sign: 
Name: Keith A. Lattimore
Title: Director, Housing Stability Dept.

Ramsey County
Housing Stability Department
121 E 7th Pl., Suite 420
St. Paul, MN 55101

Approved as to form:
Sign: 
Name: Lindsey Millard

Assistant Ramsey County Attorney

EXHIBIT A
DESCRIPTION OF SERVICES; COMPENSATION & BILLING

A. Services

Services: Fairview will provide community health nursing services to residents of County shelters or transitional housing.

Service Site(s): The Services of this Agreement will be provided at the following locations, or such other locations as agreed upon in writing by the parties:

1. Emerald Inn H2H, 2025 County Rd D, Maplewood, MN 55109
2. Capital Ridge H2H, 161 Saint Anthony Avenue, Saint Paul, MN 55103, MN

Schedule: The exact time and day of the week schedule for the provision of services is not defined in this Agreement and will be mutually coordinated between the parties and may be changed by the mutual agreement of the parties.

B. Billing and Compensation: The parties acknowledge and agree that Fairview has obtained grant funding (the “**Grant**”) from Fairview Foundation for the purpose of advancing health equity and reducing barriers to care experienced by marginalized populations. The parties agree that the costs of the Services provided will be covered by the Grant and neither party shall bill, collect, or otherwise seek reimbursement from patients, third party payors, or otherwise.

C. Collaboration: The parties agree to communicate or attend meetings, as reasonable and appropriate, to support coordination and collaboration at the Service Sites.



09/13/2022

To: Heading Home Ramsey Continuum of Care
Attn: Leigh Ann Ahmad- Acting Continuum of Care Coordinator From:
Minnesota Assistance Counsel for Veterans (MACV)

This letter serves as documentation of the ongoing collaboration between Heading Home Ramsey and Minnesota Assistance Counsel for Veterans (MACV). MACV was established in 1990 and has a long history serving Minnesota Veterans. Our nonprofit organization provides housing, employment, and legal services to address and find solutions for Veterans' homelessness. MACV provides 14 units of Transitional Housing for singles and families and 7 permanent housing options for Ramsey County Veterans.

Through SSVF (Supportive Services for Veterans and Families) MACV provides rapid rehousing, homeless prevention, and shallow subsidy supports, along with outreach, healthcare navigation, and landlord engagement. MACV partners closely with the Minneapolis VAHCS to coordinate services for Veterans who may be eligible for HUD-VASH. Through a MOU partnership with the Union Gospel Mission (UGM), MACV supports permanent and transitional housing options for Veterans within the UGM system. As the key nonprofit partner on with the Homeless Veteran Registry, MACV actively engages on each client case conference, as well as provides leadership in the response system for Veterans experiencing homelessness. Our outreach teams conduct Coordinated Entry Assessments within the continuum.

MACV will continue this work between Ramsey County between fiscal year 2022 and 2024.

Sincerely,

Nathaniel Saltz
Chief Program Officer
Minnesota Assistance Council for Veterans



STATE OF MINNESOTA DEPARTMENT OF VETERANS AFFAIRS



20 West 12th Street • St. Paul, Minnesota 55155 • (651) 296-2562
Fax (651) 296-3954 • MinnesotaVeteran.org • 1-888-LinkVet

September 12, 2022

To: Heading Home Ramsey Continuum of Care
Attn: Leigh Ann Ahmad - Continuum of Care Coordinator
From: Minnesota Department of Veterans Affairs

This letter serves as documentation of the ongoing collaboration between Heading Home Ramsey and The Minnesota Department of Veterans Affairs. The Minnesota Department of Veterans Affairs (MDVA) is a cabinet level state agency dedicated to serving Veterans and their families by assisting them in securing state and federal benefits, and by providing programs and services relating to higher education, benefits, burial, claims, outreach and Veterans preference. Governor Walz has declared his intent that Minnesota becomes the next state to end Veteran homelessness. To help Veterans experiencing homelessness access stable housing and other services, MDVA created the Minnesota Homeless Veteran Registry. The Registry connects Veterans experiencing homelessness with housing and services in their community. It also helps programs and partners serving Veterans to coordinate their efforts. A team of partners come up with individualized housing plans for veterans on the Homeless Veteran Registry after considering a veteran's unique barriers to housing and what housing resources are available.

Services offered by MDVA and Ramsey County as a collaborative :

- MDVA & the CoC Veteran Service Social Worker collaborate in bi-weekly case conferencing meetings using the Homeless Veteran Registry (HVR) with the goal of moving Veterans into housing and connecting them with to all benefits they are eligible for.
- MDVA utilizes these meetings to connect Veterans to the Coordinated Entry System.
- Ramsey County Veteran Service Social Worker is an active participant in referring Veterans to the HVR and providing outreach and ongoing support to these Veterans.
- Ramsey County and MDVA partnered on identified housing developments that would be suitable for housing Veterans experiencing homelessness.
- MDVA and Ramsey County also collaborate with stakeholders to improve the community's emergency response system.

MDVA will continue in this collaborative work alongside Ramsey County during fiscal years 2022 and 2024. If you have any questions, please contact Larry Herke - Commissioner of the Minnesota Department of Veterans Affairs

Respectfully,

Larry Herke, Commissioner
Minnesota State Department of Veterans Affairs
20 West 12th Street St. Paul MN 55155 • Office: 651-757-1555



September 12, 2022

To: Heading Home Ramsey Continuum of Care
Attn: Leigh Ann Ahmad- Acting Continuum of Care Coordinator
From: RADIUS Health

This letter serves as documentation of the ongoing collaboration between Heading Home Ramsey and RADIUS Health. RADIUS Health will be providing Outreach Services as well as assistance with housing navigation and case management to individuals experiencing unsheltered homelessness in Ramsey County.

In an effort to provide this service as a function of the Unsheltered/Special NOFO Opportunity RADIUS anticipates having two FTE Street Outreach Practitioners. RADIUS Health will utilize HMIS for data collection and entry and will continue to participate in the Continuum of Care (COC) process(es).

Services provided will be in alignment with HUD's Homeless Policy and Program Priorities. These services will target individuals experiencing unsheltered homelessness and involve an array of stakeholders by CoC participation as well as coordination of services amongst homeless services providers and will utilize a housing first approach. Additionally, services will advance equity as services will be targeted to individuals overrepresented in the homeless population. We anticipate that services would begin in April 2023 and end in April 2026.

Sincerely,

A handwritten signature in black ink, appearing to read "Matt Lewis", is written over a horizontal line.

Matt Lewis

He / Him / His

Director of Housing and Community Development

166 4th Street East, Suite 200 St. Paul, MN 55101

D 651-256-1226 | M 651-291-1979 | F 651-291-7378

Office: 651-744-7173 • Cell: 651-231-0404 • Fax: 651-632-3780