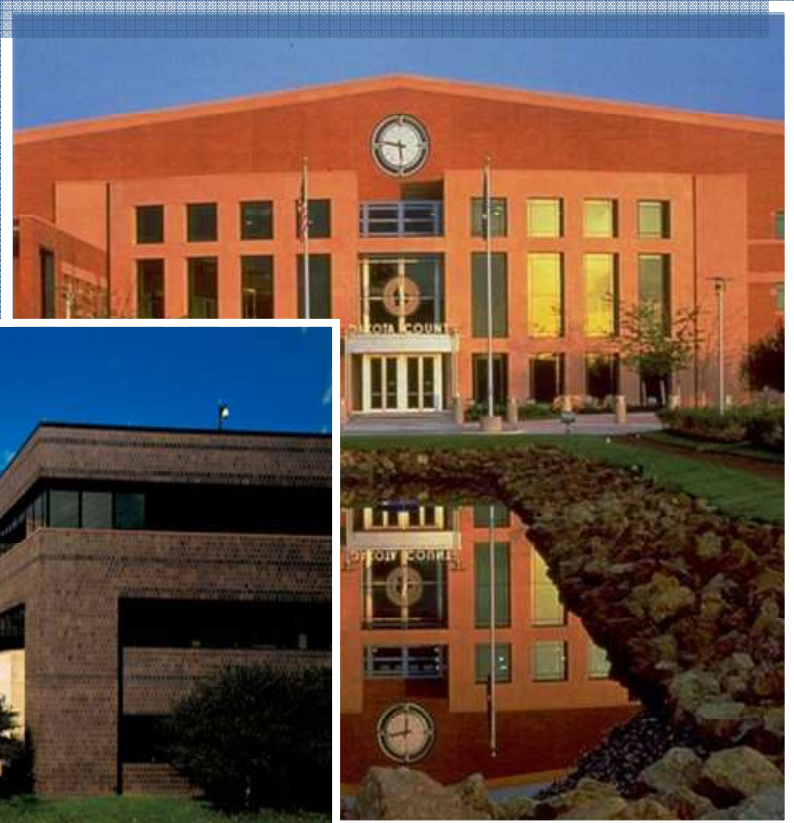


# DAKOTA COUNTY 2016 ACTION PLAN



## **Executive Summary**

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

#### **1. Introduction**

In order to receive federal funding from the U.S. Department of Housing and Urban Development (HUD), Dakota County is required to prepare a Consolidated Plan, as well as subsequent Annual Action Plans and Consolidated Annual Performance and Evaluation Reports (CAPERs), for the following entitlement programs: Community Development Block Grant (CDBG); HOME Investment Partnerships Program (HOME); Housing Opportunities for Persons with AIDS (HOPWA) and Emergency Solutions Grant (ESG). Currently, Dakota County does not receive any HOPWA funds.

The Fiscal Year 2016 Draft Annual Action Plan (Action Plan) is the second year of Dakota County's Consolidated Plan for Fiscal Years 2015-2019 (Con Plan) as ratified by the Dakota County Board of Commissioners and approved by HUD.

The Con Plan lays out the objectives, priority goals and outcomes Dakota County has established to provide decent affordable housing, suitable living environments, and expand economic opportunities principally for low and moderate income households over the next five-year period.

In the Action Plan, Dakota County identifies the proposed programs and projects to be undertaken during the 2016 program year to achieve the objectives and outcomes established in the Con Plan.

Dakota County is designated as the lead agency for the Dakota County HOME Consortium, and assumes the role of monitoring and oversight of the HOME funds for the Consortium, which includes Anoka, Dakota, Ramsey, and Washington counties and the cities of Woodbury and Coon Rapids. As the grantee of CDBG funds, Dakota County directly works with the various municipalities (municipal sub-recipients) within the County to provide access to this funding stream. The CDA provides the managerial oversight of the numerous activities implemented with CDBG resources.

The Dakota County Community Development Agency (CDA) has administered these federal funds on behalf of Dakota County since the County became an entitlement jurisdiction in 1984. Each of the three entitlement programs has eligible activities in which the funds can be utilized. The CDA is charged with ensuring the requirements are met and will continue to provide the administrative guardianship of all three programs through its agreement with the County.

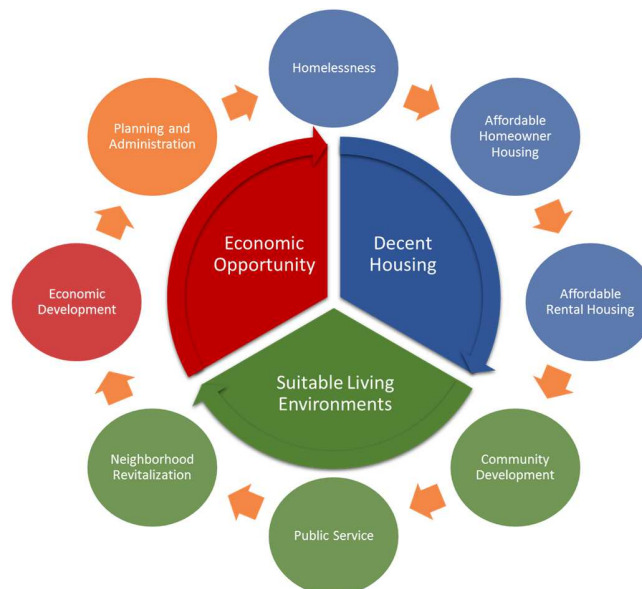
#### **2. Summarize the objectives and outcomes identified in the Plan**

With the outcomes established by Congress in mind and guided by the mission statements of Dakota County and Dakota County CDA, the following objectives were

identified to achieve the housing and community development needs of Dakota County communities and its residents.

1. Increase the affordable housing choices for low-and moderate-income households.
2. Preserve and improve existing housing to maintain affordability.
3. Increase access and quality of living by providing public services and supporting public facilities.
4. Support community development that revitalizes neighborhoods and removes safety and blight hazards.
5. Support economic development that enhances the workforce and businesses.
6. Support planning efforts that address the housing, community and economic development needs of Dakota County and continue to foster partnerships with community stakeholders.

The priority goals and the strategies to achieve the desired outcomes of decent housing, suitable living environments and economic opportunity were then formulated to serve the broad range of households, and to provide benefit to as many persons possible given the parameters of the funding programs.



The chart on the following page details the strategies from the 2015-2019 Consolidated Plan.

## 2015-2019 Consolidated Plan - Dakota County

Objective		Priority	Strategy	Outcome			
6	Support planning efforts that address the housing, community and economic development needs of Dakota County and continue to foster partnerships with community stakeholders.	1	Increase the affordable housing choices for low-and moderate-income households.	Homelessness	<ul style="list-style-type: none"> <li>a. Support the implementation and operation of coordinated access entry sites for families, youth and singles</li> <li>b. Support housing stabilization initiatives for homeless populations</li> <li>c. Support the operation of emergency shelter facilities</li> <li>d. Create additional permanent supportive housing units</li> <li>e. Support creation or renovation of shelter facilities for homeless</li> </ul>	Planning and Administration a. Support all of the goals and strategies with planning and administration	<ul style="list-style-type: none"> <li>• 100 Households provided Rapid Rehousing Assistance</li> <li>• 50 Homeless Prevention</li> </ul>
				Affordable Rental Housing	<ul style="list-style-type: none"> <li>a. Assist households to secure housing through new construction</li> <li>b. Improve energy efficiency of rental units</li> <li>c. Rehabilitate and preserve affordability in multifamily units</li> <li>d. Provide rental assistance to families and singles</li> <li>e. Support fair housing activities</li> </ul>		<ul style="list-style-type: none"> <li>• 350 Rental Units constructed</li> <li>• 100 Rental Units rehabilitated</li> <li>• 60 Households Assisted with rental assistance</li> </ul>
		2	Preserve and improve existing housing to maintain affordability.	Affordable Homeowner Housing	<ul style="list-style-type: none"> <li>a. Assist households to become homeowners</li> <li>b. Increase supply of affordable homeowner housing</li> <li>c. Improve energy efficiency of owner occupied housing units</li> <li>d. Rehabilitate and preserve affordability in single family units</li> <li>e. Provide homeowner counseling and short term assistance</li> <li>f. Support fair housing activities</li> </ul>		<ul style="list-style-type: none"> <li>• 600 Homeowner Units rehabilitated</li> <li>• 500 Direct Financial Assistance to Homebuyers</li> <li>• 15 Homeowner Units (re)constructed</li> </ul>
				Community Development	<ul style="list-style-type: none"> <li>a. Assist in the development of centers and recreational parks</li> <li>b. Assist LMI homeowners with street assessments</li> <li>c. Assist LMI homeowners with water/sewer improvements</li> <li>d. Improve sidewalk accessibility and safety</li> <li>e. Beautification</li> </ul>		<ul style="list-style-type: none"> <li>• 1,500 Persons benefited from public facility or infrastructure improvement</li> </ul>
		3	Increase access and quality of living by providing public services and supporting public facilities.	Public Services	<ul style="list-style-type: none"> <li>a. Support programs that fulfill basic needs (food and shelter) for people who are low-income and/or homeless</li> <li>b. Support programs for youth</li> <li>c. Support programs for seniors</li> <li>d. Support transportation services</li> </ul>		<ul style="list-style-type: none"> <li>• 17,000 Persons benefited from public services</li> </ul>
				Neighborhood Revitalization	<ul style="list-style-type: none"> <li>a. Address vacant or substandard properties that may or may not be suitable for rehab</li> <li>b. Address water and sanitation hazards</li> <li>c. Address contamination clean up issues</li> <li>d. Historic Rehabilitation</li> </ul>		<ul style="list-style-type: none"> <li>• 150 Households assisted</li> <li>• 5 Buildings demolished</li> <li>• 1 Historic Property Rehabilitation</li> </ul>
		4	Support community development that revitalizes neighborhoods and removes safety and blight hazards.				



		5	Support economic development that enhances the workforce and businesses.	Economic Development	<ul style="list-style-type: none"> <li>a. Support work initiatives that assist residents to access living wage jobs</li> <li>b. Support initiatives that help low-income people gain work skills, jobs and employment history</li> <li>c. Support businesses to start up or expand</li> <li>d. Provide financial assistance to businesses</li> </ul>		<ul style="list-style-type: none"> <li>• 5 Direct Financial Assistance to Businesses</li> <li>• 5 Façade treatment/business building rehabilitation</li> </ul>
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### **3. Evaluation of past performance**

Dakota County and the Dakota County HOME Consortium consistently perform well in the administration of the three grant programs discussed in this plan. In the CDBG program, one regulatory measure used by HUD to evaluate performance is the timeliness ratio test. This formula measures the amount of an entitlement community's unexpended funds 60 days prior to the start of its next program year in relation to the amount of funding it receives; the ratio cannot exceed 1.5. Dakota County's timeliness ratio is measured on May 2<sup>nd</sup> each year. On March 18, 2016, the Dakota County ratio was 1.49. There is no concern that Dakota County will meet its timeliness ratio.

The HOME program uses commitment and expenditure deadlines to measure performance. Dakota County has met all deadlines.

The ESG program uses drawdown requirements to measure performance. Dakota County has made consistent drawdowns of ESG funds.

While these financial tests are required and are measurements of performance, it is also important that projects and programs carried out with these funds meet outcome expectations and benefit eligible persons. Reporting on outcomes and beneficiaries is made available each year in the Consolidated Annual Performance and Evaluation Report (CAPER).

### **4. Summary of Citizen Participation Process and consultation process**

#### **Community partners consultation**

1. The development timeline and process of the Action Plan was discussed at the annual CDBG workshop held on November 6, 2015. Each municipality is required to formally apply for CDBG funding and request funding for activities that would best serve their community needs. Applications were provided to city staff on November 6, 2015 and were due back to the CDA by January 29, 2016.
2. CDA staff regularly attend the monthly meetings held by the Affordable Housing Coalition and consulted the members of the coalition regarding the Annual Action Plan. This discussion and feedback was helpful to determine the actions needed to meet the goals of the Con Plan. Members of the Affordable Housing Coalition also reviewed and made comments on the ESG Written Standards. These comments were incorporated into the Standards prior to the Action Plan public hearing on April 5, 2016.
3. CDA staff consulted with following Dakota County departments: Community Services, Physical Development, Environmental Resources, and the Office of Planning specific to the activities that could be potentially funded with CDBG

funds. An internal e-mail was sent to various County Departments to apply for 2016 funding with the same application deadline as the municipalities. The Physical Development Committee of the Whole reviewed the staff-recommended 2016 countywide activities at on the regular agenda, which included discussion from County Commissioners, on February 9, 2016. The Dakota County Board of Commissioners approved the countywide activities on February 16, 2016.

**To continue the community engagement process once the proposed objectives and outcomes had been identified, CDA staff presented the plan to the community and its stakeholders in the following manner:**

1. Presentations (February 2016-May 2016) – Dakota County CDA presented a draft of the priorities and goals established to the following:
  - Economic Development Management Group – comprised of the municipal community & economic development directors for Dakota County municipalities (February 25)
  - Affordable Housing Coalition meeting (February 25)
  - Physical Development Committee of the Whole (March 8)
2. Public Hearing and Comment Period (March 2016 – April 2016) – A 40-day public comment period was opened beginning March 3, 2016 running through April 10, 2016. Public notices were published in the *Dakota County Tribune*, as well as the Dakota County CDA website and Dakota County website. A public hearing was held on April 5<sup>th</sup> at the Dakota County Board of Commissioners meeting. No comments were received from the public at that meeting. The Dakota County Consortium members each held their own public hearings.

**5. Summary of public comments**

No public comments were received regarding the plan.

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

No public comments were received regarding the plan.

**7. Summary of Program Year 2016 Funds and Proposed Activities**

For the 2016 program year, Dakota County has set funding for 46 activities to take place either within a specified city or at a county-wide basis. The breakout is 39 activities are CDBG funded, three activities funded with HOME and four activities funded with ESG. The other members of the Dakota County HOME Consortium have budgeted \$1.78 million towards nine activities, excluding the administration activity. The following activity statement and graphs detail the intended uses (activities) of CDBG, HOME and ESG funds for Program Year 2016. Dakota County has been allocated approximately \$3.70 million between the three programs, the greatest being CDBG

funding. Funding for all three programs increased over Program Year 2015. CDBG increased by 6%, HOME increased by 8.7%, and ESG increased by 0.5%.

**Final Dakota County FY 2016 CDBG/HOME/ESG Activity Statement**

Final CDBG Budget with 6% (\$100,167) increase from 2015

Final HOME Budget with 8.7% (\$142,020) increase from 2015

Final ESG Budget with 0.5% (\$786) increase from 2015

**2016 Dakota County CDBG**

**Small Cities and Townships:**

City/Township	Project	2016 Budget
Miesville	Park Improvement – Basketball Court	\$ 14,478.00
Randolph	Park Improvements (Benches)	\$ 3,171.00
	Public Service – Emergency Siren	\$ 3,000.00
Township Consortium	2040 Comprehensive Plan	\$ 17,500.00
	<b>Total</b>	<b>\$ 38,149.00</b>

**Large Cities:**

City	Project	2016 Budget
Apple Valley	Homeowner Rehabilitation	\$ 113,812.00
	Public Service - DARTS Senior Chore Service	\$ 18,760.00
	<b>Total</b>	<b>\$ 132,572.00</b>

City	Project	2016 Budget
Burnsville	Homeowner Rehabilitation	\$ 126,790.00
	Public Service - 360 Communities	\$ 5,000.00
	Public Service - Burnsville Youth Collaborative	\$ 46,000.00
	Public Service - EMS Grants	\$ 8,000.00
	Public Service - Senior Services	\$ 52,000.00
	Administration	\$ 11,000.00
	<b>Total</b>	<b>\$ 248,790.00</b>

City	Project	2016 Budget
Eagan	Housing Rehabilitation	\$ 164,530.00
	Public Service – Pre-School Program	\$ 2,500.00
	Public Service - Dakota Hills Middle School Youth	\$ 18,000.00
	Public Service - Dakota Woodland Youth	\$ 4,000.00
	Public Service - Senior Services	\$ 10,500.00
	Weatherization Plus	\$ 5,000.00
	<b>Total</b>	<b>\$ 204,530.00</b>

City	Project	2016 Budget
Farmington	Commercial Rehabilitation	\$ 40,017.00
	Public Service – Senior Services	\$ 5,000.00
	<b>Total</b>	<b>\$ 45,019.00</b>

City	Project	2016 Budget
Hastings	Assessment Abatement	\$ 66,771.00
	<b>Total</b>	<b>\$ 66,771.00</b>

City	Project	2016 Budget
Inver Grove Heights	Housing Rehabilitation	\$ 62,250.00
	Comprehensive Plan Update	\$ 30,250.00
	Public Facilities -Sidewalk Accessibility Improvements	\$ 27,250.00
	<b>Total</b>	<b>\$ 119,750.00</b>

City	Project	2016 Budget
Lakeville	Homeowner Rehabilitation	\$ 65,864.00
	Spot Acquisition and Clearance	\$ 65,864.00
	<b>Total</b>	<b>\$ 131,728.00</b>
City	Project	2016 Budget
Mendota Heights	Housing Rehabilitation	\$ 27,827.00
	<b>Total</b>	<b>\$ 27,827.00</b>
City	Project	2016 Budget
Northfield	Acquisition – North/South Oaks	\$ 46,608.00
	Rental Rehab – Historic District	\$ 27,121.00
	<b>Total</b>	<b>\$ 73,729.00</b>
City	Project	2016 Budget
Rosemount	Public Facilities - Well Sealing	\$ 55,089.00
	<b>Total</b>	<b>\$ 55,089.00</b>
City	Project	2016 Budget
South St. Paul	Homeowner Rehabilitation	\$ 40,267.00
	Property Acquisition - Rediscover SSP	\$ 44,820.00
	<b>Total</b>	<b>\$ 85,087.00</b>
City	Project	2016 Budget
West St. Paul	Homeowner Rehabilitation	\$ 86,490.00
	<b>Total</b>	<b>\$ 86,490.00</b>

County Wide:	Project	2016 Budget
Dakota County	Homeowner Rehabilitation, estimate of Revolving Loan Income	\$ 400,000.00
	Countywide Homeowner Rehab	\$ 153,813.00
	Fair Housing	\$ 3,750.00
	Dakota County Rural Collaborative 2040 Comprehensive Plan	\$ 80,151.00
	Well Sealing Program	\$ 28,151.00
	CDA General Administration	\$ 191,000.00
	<b>FY16 CDBG, Total Grant Allocation</b>	<b>\$ 1,772,394.00</b>
	(excludes revolving loan funds for Homeowner Rehabilitation)	
	<b>FY16 CDBG, Cities/Twps</b>	<b>\$ 1,315,529.00</b>
	<b>FY16 CDBG, County-wide</b>	<b>\$ 456,865.00</b>



## 2016 Dakota County HOME

Member	Project	2016 Budget
Dakota County (35.10% Share)	Affordable Housing Development	\$467,860
	Community Housing Development Organization	\$93,572
	CDA General Administration	\$62,381
	<b>FY16 HOME Dakota County</b>	<b>\$623,813</b>
Member	Project	2016 Budget
Anoka County (25.00% Share) * Includes 5.3% share for Coon Rapids	Twin Cities Habitat for Humanity- Scattered Site Single Family Homeownership	\$140,000
	Tenant Based Rental Assistance	\$61,454
	Community Housing Development Organization	\$66,647
	Affordable Housing	\$131,779
	General Administration	\$44,431
	<b>FY16 HOME Anoka County</b>	<b>\$444,311</b>
Member	Project	2016 Budget
Ramsey County (23.30% Share)	Villages at Frost and English Senior	\$100,000
	Foreclosed Property Acquisition/Rehab	\$105,000
	Habitat Acquisition/Rehab	\$50,000
	Flats at Crossroads Pointe	\$7,304
	Community Housing Development Organization	\$62,115
	FirstHOME DPA	\$48,269
	General Administration	\$41,410
	<b>FY16 HOME Ramsey County</b>	<b>\$414,098</b>
Member	Project	2016 Budget
Washington County (13.30% Share)	Two Rivers – Ivy Estates	\$177,280
	SAHI - Community Housing Development Organization	\$35,456
	General Administration	\$23,637
	<b>FY16 HOME Washington County</b>	<b>\$236,374</b>
Member	Project	2016 Budget
City of Woodbury (3.30% Share)	Affordable Senior Housing Project	\$48,385
	Community Housing Development Organization	\$8,797
	General Administration	\$1,466
	<b>FY16 HOME City of Woodbury</b>	<b>\$58,649</b>
Program Income	Foreclosure property remediation	\$200,000
	Direct Homebuyer Assistance	\$50,000
	Affordable Housing Development	\$50,000
	<b>Anticipated Program Income</b>	<b>\$300,000</b>
	<b>FY16 HOME, Total Grant</b>	<b>\$1,777,245</b>

	FY16 HOME, Total Admin Budgeted (Max is 10%)	\$173,326
	FY16 HOME, Total CHDO Budgeted (Min is 15%)	\$266,587
	FY16 HOME, Total Project (non-CHDO) Budgeted	\$1,337,332

## **2016 Dakota County ESG**

	<b>Project</b>	<b>2016 Budget</b>
Dakota County	Emergency Shelter Operations	\$ 31,528.00
	Rapid Re-Housing Assistance Payments	\$ 75,786.00
	Housing Relocation and Stabilization Services	\$ 32,000.00
	General Administration	\$ 11,232.00
	<b>FY16 ESG, Final Grant</b>	<b>\$ 150,546.00</b>

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

**1. Agency/entity responsible for preparing/administering the Annual Action Plan**

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

<b>Agency Role</b>	<b>Name</b>	<b>Department/Agency</b>
Lead Agency	DAKOTA COUNTY	
CDBG Administrator	DAKOTA COUNTY	Community and Economic Development
HOPWA Administrator	MINNEAPOLIS	
HOME Administrator	DAKOTA COUNTY	Community and Economic Development
ESG Administrator	DAKOTA COUNTY	Community and Economic Development
HOPWA-C Administrator	N/A	N/A

**Table 1 – Responsible Agencies**

**Narrative**

Dakota County receives CDBG and ESG funds as an entitlement jurisdiction and receives HOME funds as a part of a consortium of counties that includes Anoka, Ramsey and Washington as well as the cities of Coon Rapids and Woodbury. Dakota County first became eligible to receive a direct allocation of CDBG funding in 1984. The Dakota County HOME Consortium was formed in 1994, and in 2013 Dakota County began to receive an allocation of ESG funding.

Dakota County is designated as the lead agency for the Dakota County HOME Consortium, and assumes the role of monitoring and oversight of the HOME funds for the Consortium. As the grantee of CDBG funds, Dakota County directly works with all cities within the County to provide access to this funding stream (municipal sub-recipients), and also provides the managerial oversight of the numerous activities implemented with CDBG resources.

The Dakota County Community Development Agency (CDA) has administered these federal funds on behalf of Dakota County since Dakota County became an entitlement jurisdiction. Dakota County and the CDA enter into a sub-recipient agreement annually to carry out the County’s obligations and responsibilities of all three entitlement programs. Each program has specific regulatory requirements and eligible activities for which the funds may be utilized. The CDA is charged with ensuring these requirements are met and will continue to provide the administrative guardianship of all three programs through its agreement with the County.

In addition to administrating each grant program, Dakota County CDA is responsible for preparing the Consolidated Plan and Annual Action Plans.

### **Action Plan Public Contact Information**

The contact for the plan is:

Maggie Dykes  
Dakota County Community Development Agency (CDA)  
Community and Economic Development Department  
1228 Town Centre Drive, Eagan, MN 55123;  
[mdykes@dakotacda.state.mn.us](mailto:mdykes@dakotacda.state.mn.us); 651-675-4464

Additionally, as the lead agency for the Dakota County HOME Consortium, portions of the plan include responses as addressed by the respective consortium member. Their contact information is listed below.

Anoka County – Karen Skepper; 763-323-5709 or [karen.skepper@co.anoka.mn.us](mailto:karen.skepper@co.anoka.mn.us)  
Ramsey County - MaryLou Egan; 651-266-8039 or [MaryLou.Egan@CO.RAMSEY.MN.US](mailto:MaryLou.Egan@CO.RAMSEY.MN.US)  
Washington County - Angela Shuppert; 651-379-9551 or [ashuppert@wchra.com](mailto:ashuppert@wchra.com)  
City of Woodbury - Karl Batalden; 651-414-3438 or [kbatalden@ci.woodbury.mn.us](mailto:kbatalden@ci.woodbury.mn.us)

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

### **1. Introduction**

Dakota County used several methods to engage citizens in the development of the Action Plan as well as consulted a variety of community stakeholders within the last year. The County and the CDA continued partnerships with housing and service providers; workforce developers; elected officials; community planners; and public entities including regional governments, municipalities and townships.

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

To improve the coordination between the various community stakeholders that are connected with Dakota County residents in multifaceted ways, Dakota County CDA attends and/or hosts meetings with these stakeholders to engage with them on a regular basis. The intent is to learn about the programs and supports being offered in the community as well as where there is a lack of programming. When there is a partnership that can be formed or support that can be offered, the CDA examines the potential role it could play to boost the conversation from dialogue to action. The CDA aims to be on the pulse of issues arising with Dakota County residents, particularly related to housing and community development.

Development of the 2016 Action Plan involves a close partnership with the following entities:

- Dakota County departments:
  - Physical Development Division
  - Community Services
- Dakota County Community Development Agency (CDA)
- Dakota Affordable Housing Coalition – A public/private collaboration that facilitates county-wide planning of homeless services and resources. Regular participants include
  - 360 Communities
  - Twin Cities Habitat for Humanity
  - Guild, Inc.
  - The Link (homeless youth program)
  - Dakota-Carver-Scott CAP Agency
- Fair Housing Implementation Council
- Dakota County HOME Consortium members – Dakota County/CDA, Anoka County, Ramsey County, Washington County and City of Woodbury
- Minnesota National Association of Housing and Redevelopment Officials (NAHRO)
- Twin Cities Local Initiatives Support Corporation (LISC)
- Dakota-Scott Workforce Investment Board (Business Services Committee)
- City of Apple Valley
- City of Burnsville
- City of Eagan



- City of Farmington
- City of Hastings
- City of Inver Grove Heights
- City of Mendota Heights
- City of Northfield
- City of Rosemount
- City of South St. Paul
- City of West St. Paul
- Rural communities including the townships of Castle Rock, Douglas, Empire, Greenvale, Hampton, Marshan, Nininger, Randolph, Ravenna, Vermillion, and Waterford; and the cities of Hampton, Miesville, Randolph, and Vermillion.

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

Dakota County is part of the regional CoC, Suburban Metro Area Continuum of Care, more commonly referred to as SMAC. It is composed of the five counties that surround the Minneapolis/St. Paul area: Anoka, Dakota, Scott, Carver and Washington Counties. Each has a local homeless planning committee, but the Dakota Affordable Housing Coalition (AHC) acts as the governing body and represents Dakota County in its response to homelessness. Dakota County CDA has been an active member in AHC and solicited the feedback of the group on matters related to the Annual Action Plan, specifically on housing and homelessness. AHC oversees the funding decisions for other resources to specifically address homelessness among individuals, families and unaccompanied youth.

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

The allocation of ESG funds was reviewed by the Dakota Affordable Housing Coalition (AHC), which voted on the amounts distributed to various activities in February 2016. The AHC determined the following distribution:

Component	2016-17	Percent
<b>Emergency Shelter Recommended for Funding</b>		
<b>Shelter Operations</b> Costs of rent, security, insurance, utilities, food, and supplies necessary for the operation of the emergency shelter	\$31,528	21%
<b>TOTAL EMERGENCY SHELTER*</b>	<b>\$31,528</b>	<b>21%</b>
<b>Rapid Re-Housing Recommended for Funding</b>		
<b>Rental Assistance</b> Medium-term (3-24 months) of rental assistance payments based on 30% of the household income.	\$75,786	50%
<b>Housing Relocation and Stabilization Services</b> Financial assistance to pay housing owners, utility companies, and other third parties for rental application fees, security deposits and last month's rent	\$32,000	21%
<b>TOTAL RAPID RE-HOUSING</b>	<b>\$107,786</b>	<b>71%</b>
<b>Administrative Expenses Recommended for Funding</b>		
Administrative Costs – Dakota County CDA costs to administer ESG program	\$3,744	2.5%
Administrative Costs – Dakota County costs to administer ESG program	\$7,488	5%
<b>TOTAL ADMINISTRATIVE</b>	<b>\$11,232</b>	<b>7.5%</b>
<b>TOTAL ESG FUNDING</b>	<b>\$150,546</b>	<b>\$150,546</b>

The written standards for ESG are replications of the SMAC adopted standards to further align with the CoC and all the other resources being used to combat homelessness. These written standards are updated on an on-going basis to ensure continued high performance when serving the homeless population

SMAC has decided to operate within a statewide Homeless Management Information System (HMIS) and, along with the other CoC regions in the state, has designated Wilder Research Center (WRC) as the lead agency of that system. The policies for HMIS are addressed within the SMAC bi-laws and ESG funds specific to Dakota County have not been prioritized for expenditure on HMIS administration.

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

Table 2 – Agencies, groups, organizations who participated

1	<b>Agency/Group/Organization</b>	DAKOTA COUNTY SUPPORTIVE HOUSING UNIT
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Anti-poverty Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Consulted through the Affordable Housing Coalition meeting and Housing and Services committee. Staff assisted in providing information related to CoC and drafting responses for the Consolidated Plan.
2	<b>Agency/Group/Organization</b>	SOUTHERN MN REGIONAL LEGAL SERVICES
	<b>Agency/Group/Organization Type</b>	Service-Fair Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Consulted through the Affordable Housing Coalition meetings and participated in the community survey. Anticipated outcomes are fair housing testing and assistance with strategies to recruit and retain landlords for subsidy rental programs, households with negative rental history, or barriers to accessing housing.
3	<b>Agency/Group/Organization</b>	THE LINK
	<b>Agency/Group/Organization Type</b>	Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy Homelessness Needs - Unaccompanied youth

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Consulted through the Affordable Housing Coalition and the Housing and Services committee meetings. They participated in the community survey. The anticipated outcomes are continued case management at Lincoln Place (youth housing) and operation of a youth drop in center.
4	<b>Agency/Group/Organization</b>	MENTAL HEALTH RESOURCES
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Health
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Consulted through the Affordable Housing Coalition and the Housing and Services committee meetings. Assisted with development of the ESG standards. Anticipated outcomes are continued work on coordinated entry.
5	<b>Agency/Group/Organization</b>	SCOTT CARVER DAKOTA CAP
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Education Service-Fair Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Consulted through the Affordable Housing Coalition and the Housing and Services committee meetings. Assisted with development of the ESG standards.
6	<b>Agency/Group/Organization</b>	VETERANS ADMINISTRATION
	<b>Agency/Group/Organization Type</b>	Housing Other government - Federal
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy Homelessness Needs - Veterans

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Consulted through the Affordable Housing Coalition meetings and participated in the community survey. Anticipated outcomes are to continue partnership with the VASH program and hope to improve coordination to identify if other housing gaps exist for Veterans.
7	<b>Agency/Group/Organization</b>	MN ASSISTANCE COUNCIL FOR VETERANS
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Needs - Veterans
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Consulted through the Affordable Housing Coalition meetings and requested to participate in the community survey. Areas for improved coordination are to identify if other housing gaps exist for Veterans. Consider a model MAC-V used in the Mankato area.
8	<b>Agency/Group/Organization</b>	NEIGHBORS INC
	<b>Agency/Group/Organization Type</b>	Services-homeless Food bank
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Consulted through the Affordable Housing Coalition meetings and participated in the community survey. Anticipated outcomes are continued work on strategies to recruit and retain landlords for subsidy rental programs, households with negative rental history, or barriers to accessing housing.
9	<b>Agency/Group/Organization</b>	PEOPLE, INC.
	<b>Agency/Group/Organization Type</b>	Services-Health
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans



	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Consulted through the Affordable Housing Coalition meetings and participated in the community survey. Anticipated outcomes are continued work on strategies to recruit and retain landlords for subsidy rental programs, households with negative rental history, or barriers to accessing housing.
10	<b>Agency/Group/Organization</b>	GUILD INCORPORATED
	<b>Agency/Group/Organization Type</b>	Services-Health
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Consulted through the Affordable Housing Coalition meetings and participated in the community survey. Anticipated outcomes are continued work on strategies to recruit and retain landlords for subsidy rental programs, households with negative rental history, or barriers to accessing housing.
11	<b>Agency/Group/Organization</b>	DAKOTA COUNTY ENVIRONMENTAL MANAGEMENT
	<b>Agency/Group/Organization Type</b>	Other government - County Grantee Department
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Consulted on the needs of water and sanitary hazards for the drinking supply. Anticipated outcome is to continue to include the well sealing program as an eligible activity to fund with CDBG.
12	<b>Agency/Group/Organization</b>	360 COMMUNITIES
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-homeless Services-Employment

	<p><b>What section of the Plan was addressed by Consultation?</b></p>	<p>Housing Need Assessment  Homelessness Strategy  Homeless Needs - Chronically homeless  Homeless Needs - Families with children  Homelessness Needs - Veterans  Homelessness Needs - Unaccompanied youth</p>
	<p><b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b></p>	<p>Consulted through the Affordable Housing Coalition meetings and requested participation in the community survey. Anticipated outcomes are continued work on strategies to recruit and retain landlords for subsidy rental programs, households with negative rental history, or barriers to accessing housing. 360 Communities has been a partner in implementing public services funded with CDBG.</p>

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

Major Employers, private sector banking/financing, and Community Development Financial Institutions were not consulted directly. The Workforce Investment Board was consulted along with city staff directly involved with economic development. This is an area for improved coordination for economic development opportunities.

Publicly funded institutions such as health-care, mental health facilities, foster care and corrections programs were not directly consulted for the purposes of the Action Plan. These facilities have previously been engaged by CoC members to coordinate the discharge planning and policies. The CoC has actively engaged representatives from local hospitals and health care providers to plan services and referral processes. The CoC has a network of collaborating agencies that ensures persons who are discharged from a mental health facility are not discharged to homelessness. Partners include County mental health case managers and social workers, and nonprofits that specialize in serving clients with mental health needs like Guild Incorporated. The CoC engages foster care workers in planning efforts to ensure they are aware of programming available for permanent housing upon discharge.

Consulted for the consolidated plan were the members and staff which implement CoC funding and are directly involved in providing the case management as identified in those policies. The intent was to connect with the providers at the client level to gain the insight and barriers they see in implementing federal funding. An example would be The Link, which provides youth homeless prevention and services in addition to 24-hour case management at Lincoln Place, a 24-unit apartment complex housing youth exiting foster care or previously homeless. The Link was consulted in drafting the ESG written standards and regularly participates in the AHC meetings. They were a provider who had completed the community survey.

Previously, Dakota County and CDA staff had met with correctional probation officers to discuss the housing options for households exiting correctional programs. The Department of Corrections is primarily responsible for preventing offenders from being released from State facilities into homelessness. The DOC provides a case manager to assist offenders with identifying housing resources.

The adjacent governmental entities that make up the HOME consortium were consulted specific to the priorities they felt were present in their communities and where HOME funding would potentially be spent. These units of government are consulted regularly for the overall implementation of the HOME program.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care Application	SMAC	Homelessness and Affordable Housing
Heading Home Dakota	Dakota County Community Services	Homelessness and Affordable Housing
5-year PHA plan Dakota County	Dakota County CDA	Affordable Housing
5-year PHA plan SSP	South St. Paul HRA	Affordable Housing
Thrive MSP 2040	Metropolitan Council	Increase supply of affordable housing
Housing Policy Plan	Metropolitan Council	Increase supply of affordable housing

**Table 3 – Other local / regional / federal planning efforts**

**Narrative**

**Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(I))**

As the administrator of the CDBG, HOME and ESG programs, the Dakota County CDA has informal and formal partnerships with local city governments, the metro area regional planning agency, County government, local and regional non-profits, state housing finance agency and department of health which informed this Annual Action Plan and will be integral in its implementation.

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

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

For the Action Plan, Dakota County CDA sought to engage citizens and include their viewpoints on the needs within the various communities and the ways CDBG, HOME and ESG funds are utilized. As detailed in the Citizen Participation Plan (attachment A), Dakota County, as a recipient of these federal funds, must provide for and encourage public participation to develop the plan. The minimum requirements are that a public hearing is held and 30-day comment period is open to obtain citizen's views. The public comment period was kept open for 40 days to ensure adequate time was given for citizens to comment on the Action Plan.

Citizen Participation dates:

- PDC – February 9, 2016 (to review County-wide CDBG activities)
- 40-Day comment period – March 3, 2016 to April 10, 2016, published on March 3, 2016
- PDC – March 8, 2016 (to review the Action Plan; set public hearing)
- Public Hearing – April 5, 2016 at the Dakota County Board of Commissioners
- County Board of Commissioners meeting– May 3, 2016 (Action Plan approved by Board)



**Citizen Participation Outreach**

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of Comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Newspaper Ad – Public Comment Period from March 3, 2016 to April 10, 2016	Non-targeted/broad community	N/A	None Received	None Received	
2	Dakota County and Dakota County CDA websites	Non-targeted/broad community	N/A	None Received	None Received	<a href="http://www.co.dakota.mn.us">www.co.dakota.mn.us</a> <a href="http://www.dakotacda.org">www.dakotacda.org</a>
3	Public Hearing – Dakota County Board of Commissioners, April 5, 2016	Non-targeted/broad community	No citizens attended the public hearing	None received	None received	
4.	Affordable Housing Coalition – regular monthly meetings	Homeless Service Providers	AHC reviewed & approved ESG standards on March 24, 2016	Comments received related to ESG standards for minimum rent payment and caseworker requirements.	None Received	

**Table 4 – Citizen Participation Outreach**

## Expected Resources

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

#### Introduction

This is the second Annual Action Plan of the 2015-2019 Consolidated Plan. The Annual Action Plan identifies the projects that will be funded in the 2016 Program Year.

#### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 2				Expected Amount Available Reminder of Con Plan: \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,772,394	400,000	168,000	2,340,394	6,604,484	The expected amount available for the remainder of consolidated plan assumes a steady 3% decrease in funding for the remaining 3 years. The amount of program income (including revolving loan funds) is anticipated to be \$400,000 per year.

HOME - Dakota	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	623,813	50,000	0	673,813	2,042,624	The expected amount available for the remainder of consolidated plan reflects a steady 3% increase for the remaining 3 years. The amount of program income is anticipated to be \$50,000 per year.
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	150,546	0	0	150,546	451,638	The expected amount available for the remainder of consolidated plan assumes steady funding for the remaining 3 years. No program income is anticipated.
Continuum of Care	public - federal	Overnight shelter Services Transitional housing	3,126,007	0	0	3,126,007	9,378,021	The expected amount available for the remainder of consolidated plan assumes flat steady funding for the remaining 3 years. No program income is anticipated.

Public Housing Capital Fund	Public-federal	Rental Assistance	511,850	0	0	511,850	1,535,550	The expected available for the remainder of consolidated plan assumes steady flat funding for the remaining 3 years.
Section 8	Public-federal	Rental Assistance	17,408,729	0	0	17,408,729	52,226,187	The expected available for the remainder of consolidated plan assumes steady flat funding for the remaining 3 years.
LIHTC	Public-federal	Acquisition Multifamily rental new construction	880,000	0	0	1,750,000	2,640,000	The CDA is authorized to allocate low-income housing tax credits to qualified projects in Dakota County. In 2016, a private developer will use the tax credits to construct a 49-unit multi-family residential building.
MHFA	Public-state	Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab Rental Assistance TBRA Transitional housing	0	0	0	0	0	Dakota County and Dakota County CDA apply for grant awards on a regular basis for affordable housing development and down payment assistance program funding.

Metropolitan Council	Public-state	Housing	0	0	0	0	0	Dakota County and Dakota County CDA apply for grant awards on a regular basis for affordable housing development.
HOPE	Public-local	Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership	1,000,000	0	0	1,000,000	0	The HOPE Program provides gap financing for the acquisition, new construction, and preservation of affordable housing- both rental and ownership- within Dakota County. The program is funded through a portion of the CDA's special benefit tax levy and a request is made to the County Board each year for this levy revenue.
RIG	Private	Acquisition Economic Development Public Improvements	1,000,000	0	0	1,000,000	0	General Fund from Dakota County CDA

Tax Increment Financing	Public-Local	Economic Development Housing Multifamily rental new construction New construction for ownership Public Improvements	0	0	0	0	0	The CDA has previously used TIF to support affordable housing development. Currently, there are 12 TIF districts that are monitored. Increment is used for to support eligible costs per Minnesota statutes. There is no excess increment that can be annually allocated towards projects.
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**Table 1 - Expected Resources – Priority Table**

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

For CDBG, the homeowner rehab program leverages state funding to provide additional loan resources to homeowners to complete rehab projects on their home, primarily mobile homes. Additionally, there are other strategies that leverage private homeowner contributions such as the well sealing program and the abatement of street assessments. CDBG-funded business loan activities require owner investment as well.

The First Time Homebuyer Program leverages private investment with state and federal dollars to provide down payment assistance in addition to the homebuyers' \$1,000 contribution required at closing. Private investment and equity is the major funding source when LIHTC are used to construct new rental housing.

Other ways funds are leveraged are in the form of match. The locally funded HOPE Program requires a 2:1 match of funds committed to a project whereas the ESG program requires a 1:1 match. ESG utilizes levy funds to meet the match requirement while the HOME Program's 25% match on funds drawn is met by the various funding streams that may be combined in a rental development project or by donated time and money when working with Habitat for Humanity.

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

Using the Neighborhood Stabilization Program (NSP) funds, Dakota County CDA acquired several foreclosed properties during the economic downturn. The existing homes were in unfavorable conditions and were demolished to remove the safety and blight hazards they posed. A handful of these land bank lots have been sold to CHDO and non-CHDO organizations to develop affordable housing options for low income homeowners. It is likely this type of partnership will continue with some of the remaining lots.

Other parcels of land that had been acquired by the CDA had been through tax-forfeiture. The CDA in one case has rehabilitated the property and sold the single-family home. The other parcel is zoned for multifamily and commercial development. The CDA is continuing to explore the best options for the parcel.

## Annual Goals and Objectives

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

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Affordable Rental Housing	2016	2017	Affordable Housing Homeless Non-Homeless Special Needs	Countywide	Affordable Rental Housing Planning and Administration	CDBG HOME	Rental units constructed: 113 Household Housing Unit
2	Affordable Home Owner Housing	2016	2017	Affordable Housing	Countywide	Affordable Homeowner Housing Planning and Administration	CDBG HOME	Homeowner Housing Added: 1 Household Housing Unit  Homeowner Housing Rehabilitated: 70 Household Housing Unit  Direct Financial Assistance to Homebuyers: 89 Households Assisted
3	Homelessness	2016	2017	Homeless	Countywide	Affordable Rental Housing Homelessness Public Service Community Development Planning and Administration	ESG	Tenant-based rental assistance / Rapid Rehousing: 5 Households Assisted  Homelessness Prevention: 5 Persons Assisted



<b>4</b>	Community Development	2016	2017	Non-Housing Community Development	Countywide	Community Development	CDBG	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 23,054 Persons Assisted (Sealing municipal wells)
<b>5</b>	Public Service	2016	2017	Non-Housing Community Development	Countywide	Public Service	CDBG ESG	Public service activities other than Low/Moderate Income Housing Benefit: 3,600 Persons Assisted
<b>6</b>	Economic Development	2016	2017	Non-Housing Community Development	Countywide	Community Development	CDBG	Facade treatment/business building rehabilitation: 2 Businesses
<b>7</b>	Neighborhood Revitalization	2016	2017	Non-Housing Community Development	Countywide	Economic Development	CDBG	Buildings Demolished: 2 Buildings
<b>8</b>	Planning and Administration	2015	2016	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	Countywide	Affordable Rental Housing Affordable Homeowner Housing Homelessness Public Service Community Development Economic Development	CDBG HOME ESG	Other: 3 Plans

**Table 2 – Goals Summary**

## Goal Descriptions

1	<b>Goal Name</b>	Affordable Rental Housing
	<b>Goal Description</b>	The following strategies will be used to provide increased choice and improve existing housing specifically for renter-occupied units. <ol style="list-style-type: none"> <li>1. Assist household to secure housing through new construction</li> <li>2. Improve energy efficiency of rental units</li> <li>3. Rehabilitate and preserve affordability in multifamily units</li> <li>4. Provide rental assistance to families and singles</li> <li>5. Support fair housing activities</li> </ol>
2	<b>Goal Name</b>	Affordable Home Owner Housing
	<b>Goal Description</b>	The following strategies will be used to provide increased choice and improve existing housing specifically for owner -occupied units. <ol style="list-style-type: none"> <li>1. Assist households to become homeowners</li> <li>2. Increase supply of affordable homeowner housing</li> <li>3. Improve energy efficiency of owner occupied housing units</li> <li>4. Rehabilitate and preserve affordability in single family units</li> <li>5. Provide homeowner counseling and short term assistance</li> <li>6. Support fair housing activities</li> </ol>
3	<b>Goal Name</b>	Homelessness
	<b>Goal Description</b>	The following strategies will be used to provide increased choice and improve existing housing specifically for households experiencing homelessness or are at-risk of homelessness. <ol style="list-style-type: none"> <li>1. Support the implementation and operation of coordinated access entry sites for families, youth and singles</li> <li>2. Support housing stabilization initiatives for homeless populations</li> <li>3. Support the operation of emergency shelter facilities</li> <li>4. Provide shelter and stabilization services</li> <li>5. Create additional permanent supportive housing units</li> <li>6. Support creation or renovation of shelter facilities for homeless</li> </ol>
4	<b>Goal Name</b>	Community Development
	<b>Goal Description</b>	The following strategies will be used to increase access and the quality of living specific to public infrastructure and facilities. <ol style="list-style-type: none"> <li>1. Assist LMI homeowners with street assessments</li> <li>2. Assist LMI homeowners with water/sewer, storm water and solid waste improvements</li> <li>3. Assist with the development of centers and recreational park improvements</li> <li>4. Improve sidewalk accessibility and safety</li> <li>5. Permanently seal abandoned municipal and residential wells</li> </ol>

5	<b>Goal Name</b>	Public Service
	<b>Goal Description</b>	The following strategies will be used to increase access and the quality of living specific to providing public services. <ol style="list-style-type: none"> <li>1. Support programs that fulfill basic needs (food and shelter) for people who are low-income and or homeless</li> <li>2. Support programs that help abused and neglected youth</li> <li>3. Support programs for seniors</li> <li>4. Support transportation services</li> <li>5. Support emergency services, including community-wide siren</li> </ol>
6	<b>Goal Name</b>	Economic Development
	<b>Goal Description</b>	The following strategies will be used to enhance the workforce and businesses. <ol style="list-style-type: none"> <li>1. Support work initiatives that assist participants to access living wage jobs</li> <li>2. Support initiative that help low-income people gain work skills, jobs and employment history</li> <li>3. Assist businesses to start up or expand</li> <li>4. Provide training and technical assistance to businesses to increase assets and create jobs</li> </ol>
7	<b>Goal Name</b>	Neighborhood Revitalization
	<b>Goal Description</b>	The following strategies will be used to revitalize neighborhoods and remove safety and blight hazards. <ol style="list-style-type: none"> <li>1. Address vacant or substandard properties that may or may not be suitable for rehab</li> <li>2. Address water and sanitation hazards</li> <li>3. Address contamination clean up issues</li> <li>4. Historic Rehabilitation</li> </ol>
8	<b>Goal Name</b>	Planning and Administration
	<b>Goal Description</b>	Support all of the goals and strategies with funding for planning and effective administration. Support 2040 Comprehensive Plan documents.

**Table 3 – Goal Descriptions**

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

It is estimated that the Dakota County CDA will produce 70 new units. This will be a combination of rental and homebuyer units. It is also estimated that 70 extremely low-income, low-income and moderate-income families will benefit from the production of these affordable units.

## AP-35 Projects - 91.420, 91.220(d)

### Introduction

For the 2016 program year, Dakota County has set funding for 46 activities to take place either within a specified city or at a county-wide basis. The breakout is 39 activities are CDBG funded, three activities funded with HOME and four activities funded with ESG. The other members of the Dakota County HOME Consortium have budgeted \$1.78 million towards nine activities, excluding the administration activity. The following activity statement and graphs detail the intended uses (activities) of CDBG, HOME and ESG funds for Program Year 2016. Dakota County has been allocated approximately \$3.70 million between the three programs, the greatest being CDBG funding. Funding for all three programs increased over Program Year 2015. CDBG increased by 6%, HOME increased by 8.7%, and ESG increased by 0.5%.

### 2016 Dakota County CDBG

#### Small Cities and Townships:

City/Township	Project	2016 Budget
Miesville	Park Improvement – Basketball Court	\$ 14,478.00
Randolph	Park Improvements (Benches)	\$ 3,171.00
	Public Service – Emergency Siren	\$ 3,000.00
Township Consortium	2040 Comprehensive Plan	\$ 17,500.00
	<b>Total</b>	<b>\$ 38,149.00</b>

#### Large Cities:

City	Project	2016 Budget
Apple Valley	Homeowner Rehabilitation	\$ 113,812.00
	Public Service - DARTS Senior Chore Service	\$ 18,760.00
	<b>Total</b>	<b>\$ 132,572.00</b>

City	Project	2016 Budget
Burnsville	Homeowner Rehabilitation	\$ 126,790.00
	Public Service - 360 Communities	\$ 5,000.00
	Public Service - Burnsville Youth Collaborative	\$ 46,000.00
	Public Service - EMS Grants	\$ 8,000.00
	Public Service - Senior Services	\$ 52,000.00
	Administration	\$ 11,000.00
	<b>Total</b>	<b>\$ 248,790.00</b>

City	Project	2016 Budget
Eagan	Housing Rehabilitation	\$ 164,530.00
	Public Service – Pre-School Program	\$ 2,500.00
	Public Service - Dakota Hills Middle School Youth	\$ 18,000.00
	Public Service - Dakota Woodland Youth	\$ 4,000.00
	Public Service - Senior Services	\$ 10,500.00
	Weatherization Plus	\$ 5,000.00
	<b>Total</b>	<b>\$ 204,530.00</b>

City	Project	2016 Budget
Farmington	Commercial Rehabilitation	\$ 40,017.00
	Public Service – Senior Services	\$ 5,000.00
	<b>Total</b>	<b>\$ 45,017.00</b>

City	Project	2016 Budget
Hastings	Assessment Abatement	\$ 66,771.00

	<b>Total</b>	<b>\$ 66,771.00</b>
<b>City</b>	<b>Project</b>	<b>2016 Budget</b>
Inver Grove Heights	Housing Rehabilitation	\$ 62,250.00
	Comprehensive Plan Update	\$ 30,250.00
	Public Facilities -Sidewalk Accessibility Improvements	\$ 27,250.00
	<b>Total</b>	<b>\$ 119,750.00</b>
<b>City</b>	<b>Project</b>	<b>2016 Budget</b>
Lakeville	Homeowner Rehabilitation	\$ 65,864.00
	Spot Acquisition and Clearance	\$ 65,864.00
	<b>Total</b>	<b>\$ 131,728.00</b>
<b>City</b>	<b>Project</b>	<b>2016 Budget</b>
Mendota Heights	Housing Rehabilitation	\$ 27,827.00
	<b>Total</b>	<b>\$ 27,827.00</b>
<b>City</b>	<b>Project</b>	<b>2016 Budget</b>
Northfield	Acquisition – North/South Oaks	\$ 46,608.00
	Rental Rehab – Historic District	\$ 27,121.00
	<b>Total</b>	<b>\$ 73,729.00</b>
<b>City</b>	<b>Project</b>	<b>2016 Budget</b>
Rosemount	Public Facilities - Well Sealing	\$ 55,089.00
	<b>Total</b>	<b>\$ 55,089.00</b>
<b>City</b>	<b>Project</b>	<b>2016 Budget</b>
South St. Paul	Homeowner Rehabilitation	\$ 42,677.00
	Property Acquisition - Rediscover SSP	\$ 42,410.00
	<b>Total</b>	<b>\$ 85,087.00</b>
<b>City</b>	<b>Project</b>	<b>2016 Budget</b>
West St. Paul	Homeowner Rehabilitation	\$ 86,490.00
	<b>Total</b>	<b>\$ 86,490.00</b>
<b>County Wide:</b>		
	<b>Project</b>	<b>2016 Budget</b>
Dakota County	Homeowner Rehabilitation, estimate of Revolving Loan Income	\$ 400,000.00
	Countywide Homeowner Rehab	\$ 153,813.00
	Fair Housing	\$ 3,750.00
	Dakota County Rural Collaborative 2040 Comprehensive Plan	\$ 80,151.00
	Well Sealing Program	\$ 28,151.00
	CDA General Administration	\$ 191,000.00
	<b>FY16 CDBG, Total Grant Allocation</b>	<b>\$ 1,772,394.00</b>
	<i>(excludes revolving loan funds for Homeowner Rehabilitation)</i>	
	<b>FY16 CDBG, Cities/Twps</b>	<b>\$ 1,315,529.00</b>
	<b>FY16 CDBG, County-wide</b>	<b>\$ 456,865.00</b>

## 2016 Dakota County HOME Consortium

Member	Project	2016 Budget
Dakota County (35.10% Share)	Affordable Housing Development	\$467,860
	Community Housing Development Organization	\$93,572
	CDA General Administration	\$62,381
	<b>FY16 HOME Dakota County</b>	<b>\$623,813</b>
Member	Project	2016 Budget
Anoka County (25.00% Share) * Includes 5.3% share for Coon Rapids	Twin Cities Habitat for Humanity- Scattered Site Single Family Homeownership	\$140,000
	Tenant Based Rental Assistance	\$61,454
	Community Housing Development Organization	\$66,647
	Affordable Housing	\$131,779
	General Administration	\$44,431
	<b>FY16 HOME Anoka County</b>	<b>\$444,311</b>
Member	Project	2016 Budget
Ramsey County (23.30% Share)	Villages at Frost and English Senior	\$100,000
	Foreclosed Property Acquisition/Rehab	\$105,000
	Habitat Acquisition/Rehab	\$50,000
	Flats at Crossroads Pointe	\$7,304
	Community Housing Development Organization	\$62,115
	FirstHOME DPA	\$48,269
	General Administration	\$41,410
	<b>FY16 HOME Ramsey County</b>	<b>\$414,098</b>
Member	Project	2016 Budget
Washington County (13.30% Share)	Two Rivers – Ivy Estates	\$177,280
	SAHI - Community Housing Development Organization	\$35,456
	General Administration	\$23,637
	<b>FY16 HOME Washington County</b>	<b>\$236,374</b>
Member	Project	2016 Budget
City of Woodbury (3.30% Share)	Affordable Senior Housing Project	\$48,385
	Community Housing Development Organization	\$8,797
	General Administration	\$1,466
	<b>FY16 HOME City of Woodbury</b>	<b>\$58,649</b>
Program Income	Foreclosure property remediation	\$200,000
	Direct Homebuyer Assistance	\$50,000
	Affordable Housing Development	\$50,000
	<b>Anticipated Program Income</b>	<b>\$300,000</b>
	<b>FY16 HOME, Total Grant</b>	<b>\$1,777,245</b>
	FY16 HOME, Total Admin Budgeted (Max is 10%)	\$173,326
	FY16 HOME, Total CHDO Budgeted (Min is 15%)	\$266,587
	FY16 HOME, Total Project (non-CHDO) Budgeted	\$1,337,332

## **2016 Dakota County ESG**

	<b>Project</b>	<b>2016 Budget</b>
Dakota County	Emergency Shelter Operations	\$ 31,528.00
	Rapid Re-Housing Assistance Payments	\$ 75,786.00
	Housing Relocation and Stabilization Services	\$ 32,000.00
	General Administration	\$ 11,232.00
	<b>FY16 ESG, Final Grant</b>	<b>\$ 150,546.00</b>

**Table 3 – Project Information**

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

Dakota County allows each municipality to determine where best to direct the CDBG funding they have been allocated based upon strategies that have been adopted. Program regulation also dictates the percentage of CDBG funding that be utilized for public service and planning activities.

At least 15% of HOME funding must be provided to a Community Housing Development Organization (CHDO) and the maximum percentage available for HOME administrative expenditures is 10%. At this time Dakota County has not determined a specific housing development or CHDO project to award the 2016 funds but once a HOME eligible activity has been identified, a substantial amendment to the 2016 Action Plan will be conducted to notify the public.

The housing and services committee determined the most effective use for 2016 ESG funding was providing Rapid-Rehousing rental assistance subsidies. It aligns with the direction the Dakota County Supportive Housing Unit (SHU) has taken with the CoC funding they administer. A maximum of 7.5% can be used for administration.

## **AP-38 Project Summary**

### **Project Summary Information**

Homeowner Rehabilitation (Countywide, and some Cities) - The Housing Rehabilitation Loan Program is available to assist low and moderate income homeowners in improving and maintaining their homes into a decent, safe and sanitary condition. The program offers 0% deferred loans to homeowners at 80% of median income.

Park Improvements (Randolph, Miesville) – The City of Randolph will use funds to purchase and install two benches for the City’s public park. The City of Miesville will use CDBG funds to install a basketball court.

Public Service – Emergency Siren (Randolph) – The City of Randolph received funding in 2014 for a new emergency siren; the costs of purchase and installation exceeded that amount. The old siren is in need of updating and additional funding will allow for the purchase and installation of the siren.

2040 Comprehensive Plans (Township/Small City Consortium, County-wide, Inver Grove Heights) – Every municipality and township in the Metropolitan Area is required by Minnesota statute to update its Comprehensive Plan. A consortium of Dakota County townships and small cities has allocated funding for this effort. To support the rural collaborative, Dakota County has also allocated funding for this activity. The City of Inver Grove Heights has also allocated funding for its Comprehensive Plan.

Public Service - DARTS Senior Chore Service (Apple Valley) - DARTS Outdoor Chore Service and Homemaking Service programs assist Apple Valley senior residents with outdoor chores such as snow removal, lawn mowing, weeding gardens, and small tree/shrub trimming. The Homemaking service provides seniors help with housekeeping, laundry, and other indoor chores.

Public Service - 360 Communities (Burnsville) - Activity is to provide funding for staff to recruit, train and support volunteers who provide support to low/moderate-income residents of Burnsville. Volunteer training may include education of available resources, communication, intake interviewing, goal planning, appropriate referral, crisis intervention, skill building and coordinated case management. Families receive services from 360 Communities' volunteers that are comprehensive and culturally sensitive.

Public Service - Burnsville Youth Collaborative (Burnsville) - Activity is to provide after school staffing, support and services for teens ages 12-16. The participants of the Burnsville Youth Collaborative represent youth from Nicollet Junior High in grades 6-8. Staff and local agencies work together to provide a safe place for Burnsville teens after school and on the weekends.

Public Service - EMS Grants (Burnsville) – Provides assistance to those with difficulty paying for an emergency medical transport provided by the Burnsville EMS.



Public Service - Senior Services (Burnsville) - Activity is to support the senior services within Burnsville, including 60% of the cost for a .75 FTE position (Community Services Specialist) to oversee the Senior Volunteer program, coordinate educational and wellness opportunities for seniors 62 and older as well as serve as a liaison between senior service agencies, the city and Burnsville senior residents and caregivers. Funding is also provided to assist seniors with taking care of their homes including appliance removal and to DARTS to provide chore services such as lawn care and snow removal.

Public Service - Dakota Hills Middle School Youth (Eagan) - Funds will be used to support an afterschool and summer recreation program held at Dakota Hills Middle School. Activities include sports, games, art, dance, science, homework help, and leadership development. The goal is to encourage youth to engage in activities that will improve their connection to school and community in a safe learning environment.

Public Service - Dakota Woodland Youth (Eagan) - Funds will be used to support a year round recreation program for children staying at the Dakota Woodlands homeless shelter. The program is to offer recreational opportunities for children to help develop physical and social skills in a safe environment.

Public Service - Senior Services (Eagan) - Programming is provided for a growing senior population to help provide opportunities that focus on keeping them active, challenged and independent. Activities focus on health and wellness such as Yoga, Tai Chi, watercolor painting, nutrition and personal development classes.

Weatherization Plus Program (Eagan) - The weatherization plus program is to provide homeowners with 0% deferred loans to make improvements specifically for energy efficiency and weatherization improvements.

Commercial Rehabilitation (Farmington) - Funds will be available to businesses that need to complete repairs to their building on the interior or exterior to improve the overall sustainability of the business.

Public Services – Senior Services (Farmington) – Funds will be used to support the senior services provided to low- to moderate-income residents at the Rambling River Center, which is a drop-in senior center providing programs and services for adults over the age of 50.

Spot Acquisition and Clearance (Lakeville) – The city has identified a vacant property that it will acquire and clear. The property is an abandoned, dilapidated gas station with an attached single-family residence. All structures will be removed.

ADA Compliance Improvements (Inver Grove Heights) – Funds will be used funds for accessibility improvements to City facilities, including streets and sidewalks, under the Americans with Disabilities Act (ADA).

Property Acquisition (South St. Paul) - The City of South St. Paul's Rediscover SSP program purchases substandard or blighted properties, then clears the site and sells the lot at market value for in-fill construction of single family homes. All sales are voluntary. The new homes must meet design standards to assure they fit into the neighborhood.

Fair Housing (Countywide) – This activity has been dedicated to continue to further fair housing efforts in Dakota County through the participation in the Fair Housing Implementation Council.

Well Sealing Program (Countywide, Rosemount) - CDBG funds are available to property owners to seal old wells that meet a minimum scoring requirement based on the potential threat to the public water supply. The property owner is reimbursed 50% of the cost of sealing the well, up to a maximum of \$2,000. Applications are accepted on a first come, first serve basis. Additionally, the City of Rosemount will use CDBG funds to seal abandoned municipal wells located on private property in the city.

Historic District Rental Rehabilitation (Northfield) – CDBG funds will be used for the rehabilitation, restoration and preservation of rental units occupied by low and moderate income families.

North/South Oaks Acquisition (Northfield) – Funds will be provided to assist in the acquisition of a 43 unit apartment complex. The unit will later be rehabilitated and rented to households at or below 60% of the area median income.

Assessment Abatement (Hastings) – Funds will be provided to low income property owners to abate 100% of assessments that resulted from street and sidewalk improvements. Remaining funding will be utilized for assessment abatement for moderate income property owners.

Affordable Housing Development (Dakota Countywide) – Funds will go to the new construction or rehabilitation of an affordable housing development yet to be identified.

Community Housing Development Organization (CHDO) {undesignated} (Dakota Countywide) - 15% of funds will be set aside for CHDO eligible activity, which is yet to be determined, in Dakota County.

Rapid Re-Housing Assistance Payments (Countywide) – Activity will provide individuals and families that meet the definition of homelessness rental assistance for up to 24 months. Security deposit assistance and payment of unpaid rent for up to 6 months will also be available to those found eligible for the program.

Emergency Shelter Operations (Countywide) – Activity will assist with rent, security, insurance, utilities, food and supplies necessary for the operation of an emergency shelter.

Housing Relocation and Stabilization Services (Countywide) - Dakota County will provide assistance for security deposits, utilities and other fees that may be incurred for initially occupying housing.

General Administration of the CDBG program (Countywide) - General program administration and oversight of the Dakota County CDBG Program including environmental reviews, marketing, program management.

General Administration of the HOME program (Dakota Countywide) – General program administration of the Dakota County HOME program, as well as oversight and technical supervision of Dakota County Consortium. Each Consortium member receives administrative funds proportional to its contributions, less an administrative fee payable to Dakota County.

General Administration of the ESG program (Countywide) - Dakota County will administer this program through the Community Services division. A portion of the administration funds will be provided to the CDA to coordinate activities, environmental reviews, marketing of programs, and other administrative duties.

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

Dakota County and its participating municipal sub-recipients do not target the use of the federal funds to any one specific area within the County. Generally, funds are used to support programs that provide a benefit to all eligible residents county-wide rather than to areas of concentration. The municipal sub-recipients may further refine the area to within city-limit boundaries for projects utilizing CDBG funding awards.

**Geographic Distribution for 2016**

Distribution Area	Percentage of Funds	Program Funding
Apple Valley	7.48%	CDBG
Burnsville	14.04%	
Eagan	11.54%	
Farmington	2.54%	
Hastings	3.77%	
Inver Grove Heights	6.76%	
Lakeville	7.43%	
Mendota Heights	1.57%	
Northfield	4.16%	
Rosemount	3.11%	
South St. Paul HRA	4.80%	
West St. Paul	4.88%	
Small Cities/Twps (Rural Collaborative, Randolph, Miesville)	2.16%	
Countywide	25.78%	
Dakota County	35.1%	HOME
Anoka County (includes Coon Rapids)	25.0%	
Ramsey County	23.3%	
Washington County	13.3%	
City of Woodbury	3.3%	
Countywide	100%	ESG

Table 4 - Geographic Distribution

**Rationale for the priorities for allocating investments geographically**

Dakota County’s status as an “Urban County” is supported by the municipalities of the County, particularly those communities that could qualify as entitlement jurisdictions individually. By remaining a collective whole, it enables the County to receive more funding, reduces the administrative burden, and allows for program efficiencies. As a result, the municipalities are partners in implementing the CDBG program directly within their communities and 75% of the funds are set-aside for the municipalities.

Specific to HOME, each member of the Consortium is awarded a percentage of the overall allocation based upon the share percentage determination HUD provides. Dakota County has not chosen to disperse HOME funding to specific geographies and has chosen to wait to identify a HOME eligible project. The location of the project will be considered, but other factors such as site control, project financing and feasibility, and project readiness will heavily dictate where the funds are utilized.

ESG funds will be used for tenant based rapid re-housing assistance. It is up to the discretion of the tenant to locate housing in a community in which they prefer to live. Therefore, ESG is not directed to any one community, however in most cases it should be utilized within Dakota County.

## Affordable Housing

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

#### Introduction

The Program year 2016 projects support affordable housing opportunities to very low and low income households through production of new units, rehabilitation of existing units and rapid re-housing assistance.

One Year Goals for the Number of Households to be Supported	
Homeless	20
Non-Homeless	10
Special-Needs	0
Total	30

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	70
Rehab of Existing Units	120
Acquisition of Existing Units	2
Total	192

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

#### Discussion

Dakota County CDA and the municipal sub-recipients will focus approximately \$1.2 million of CDBG funding towards homeowner rehabilitation. The remaining will be spread out to remove safety/blight hazards and revitalize the community, improve public facilities, implement public service programs for youth and seniors, and provide financing to complete plans and administer the CDBG program overall.

Dakota County HOME funds have been set aside for new housing development and rehabilitation. Per program regulations, HOME funds are not formally awarded to a specific project until the majority of the project's financing has been secured and gap funding is needed. Dakota County will follow the prescribed substantial amendment process to notify the public and solicit for comment once a project has been identified. While Dakota County's 2016 HOME funding has not been dedicated to a specific project at this point, the CDA has planned the development of senior housing in Rosemount and Lakeville, and a family workforce townhome development in Lakeville and Rosemount. A Dakota County HOME TBRA program will not be operated with 2016 funds, as further consideration is needed on the design and implementation before the program can be operated.

Lastly, ESG funding for 2016 has been budgeted to assist with emergency shelter operations; and provide rapid re-housing, which entails providing recipients' rental payment assistance and security deposit assistance. The remaining funds will provide additional financial assistance for housing relocation and stabilization services.

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

### **Introduction**

The Dakota County CDA is responsible for administering the majority of the public housing inventory and Housing Choice Voucher programs in Dakota County. The scattered site public housing includes 243 single family homes, duplexes, four-plexes and townhomes located throughout the county and an 80-unit apartment building, Colleen Loney Manor, located in West St. Paul. In addition to the CDA, South St. Paul operates 298 units of public housing in two apartment buildings, Nan McKay and John Carroll building.

The Housing Choice Voucher Program is also administered by the CDA and is a federal program for all jurisdictions in Dakota County. The CDA assists over 2,600 households through this program. The CDA also administers project based assistance for units in Grande Market Place, Hidden Ponds and Cedar Villas, a total of 49 units among the three, all two- and three-bedroom units.

Public housing and the Housing Choice Voucher program assist households with income levels below 50% of area median income.

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

The Dakota County CDA will continue to invest operating and capital funds to the modernization of the housing units it owns and maintains. The CDA gathers resident and staff input when determining the scope of work needed to meet the needs, and extends invitations annually to all public housing residents to attend meetings where staff are on hand to listen to and record concerns and requests of the residents. For those unable to attend these sessions, staff provides them with contact information in order for them to share their thoughts in writing via emails or letters or by leaving voicemails for staff. CDA staff also solicits comments from local municipalities regarding needs or comments on CDA units contained within their jurisdictions. Staff receives comments from city administrators, city zoning staff, city code enforcement staff, local police departments, and other relevant entities.

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

The Dakota County CDA employs a Homeownership Specialist and a First Time Homebuyer Specialist who provide housing counseling for households interested in homeownership. During a typical pre-purchase counseling session, staff will discuss with a client the importance of credit, credit repair, financial management, etc. This service has been marketed in the past to the public housing residents and residents in other CDA-owned affordable housing. During the next year, the CDA will continue to send information promoting the pre-purchase counseling program to public housing residents twice via mail.

The Dakota County CDA encourages residents living in CDA-owned or managed units to become more involved through resident meetings and informational brochures. Residents receive information from CDA staff on how and where they can view the PHA plan and post comments to the plan on the CDA website. In addition, CDA staff are also diligent in sending out information to residents regarding the following areas that will assist them in self-sufficiency:

- Financial Empowerment classes
- Budgeting resource classes
- First Time Homebuyer information/classes
- Job Resource Fairs

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

The CDA is not designated as “troubled”. HOME Consortium members Anoka County, Ramsey County, Washington County and the City of Woodbury are not designated as “troubled.”



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

### **Introduction**

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

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

See goals above. Dakota County will continue to utilize local funding to reach out to homeless persons, sheltered or unsheltered to connect the household to resources to address their individual needs. The goal to produce additional housing options, provide TBRA programs (rapid re-housing), provide public services and support economic development initiatives will all contribute to the efforts CoC funding and other local resources are providing to homeless households.

ESG funding is used to fund emergency shelter operations, rental subsidy, and financial stabilization services like security deposits and first month's rent.

### **Addressing the emergency shelter and transitional housing needs of homeless persons**

Specifically addressing the emergency shelter needs will be done primarily with ESG funds. ESG funding has been used in recent years to provide on-going rental subsidy. As Dakota County further explores the emergency solutions for homeless persons, ESG funding may be used in alternative ways to address the needs present in the communities.

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

Dakota County implemented initiatives to transition households experiencing homelessness into housing. Private funding was secured to implement the Housing Access Resource Team, including a Housing Partnership Manager (HPM) and Tenant Navigator (TN). The HPM develops relationships with landlords to provide choices for persons with rental barriers who need housing. The TN works with clients on the Coordinated Entry Housing Wait List to prepare them for housing opportunities when available. Dakota County increased housing search and stability services and continued to receive state and foundation support for prevention resources.

Dakota County's protocols for the discharge of persons from publicly funded institutions and other systems of care are designed to prevent immediate homelessness. Below is a

summary of the policies, procedures and proposed changes from SMAC's CoC application.

**Health Care:** Releasing medically fragile, homeless people is a growing problem. Medical respite beds are available in the metro area and the CoC is collaborating with metro providers to establish a program that houses homeless persons being released from hospitals. Healthcare for the Homeless monitors and provides medical services in shelters. The American Red Cross provides emergency social services during non-business hours to accommodate discharge. Hospital social workers make referrals to Social Services, then individuals are offered adult protection services. If eligible, clients are offered direct assistance in obtaining housing. If not eligible for Social Services or case coordination through Public Health Nursing, they are referred to Economic Assistance to determine eligibility for financial aid. If there is a safety concern, the county may place non-disabled adults in a motel in lieu of shelter for up to three days.

**Foster Care:** Protocol is in place so no one is discharged from foster care without stable housing. Minnesota legislation directs counties to develop discharge plans with all foster care youth at age 16. All youth receive a notice regarding their rights. Foster care youth may stay in foster care until age 21 or choose to live independently and work with their case manager to identify and secure permanent housing, including accessing resources for a damage deposit and rental assistance. All youth transitioning from foster care develop a discharge plan with their county case manager; the plan includes needs, goals, resources and a support system. The CoC reviews the foster care discharge policy with county staff annually. Child protection staff responsible for discharge and case management participate in monthly CoC meetings.

**Mental Health:** Protocol is in place so no one is discharged from a mental health facility without stable housing. The state mandates all persons committed to any of the state's regional treatment facilities are assigned a mental health case manager through the county in which they live or last claimed residency. Discharge planning begins while the individual is committed and housing remains a part of the treatment plan after discharge to ensure housing is maintained. Persons leaving mental health facilities are typically discharged to adult foster care or other state resources to assist with housing stability.

**Corrections:** The State of Minnesota, Department of Corrections (DOC) staff complete an intake assessment when an inmate enters a facility and determines eligibility for county services and income support. If an inmate is homeless upon entering, their correctional officer coordinates with county personnel for housing search. State Prisons conduct training classes for inmates leaving the facility that deal with issues that inmates encounter upon release, including housing. DOC has worked with members of the SMAC to eliminate significant barriers to rehousing ex-offenders.

**Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving**

**assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.**

Dakota County established a crisis line as a centralized access point for households that are experiencing a housing crisis and are homeless or at risk of homelessness. This line centralizes the calls for all populations experiencing a housing crisis. Three providers in Dakota County are the initial contact points depending on household composition. For singles and families, it is Dakota County Intake, for youth it is The Link, and for domestic violence or sexual assault victims it is 360 Communities' Lewis House.

A centralized housing wait list is maintained for persons who are homeless. The wait list is designed to match households to the best ongoing resource to meet their housing and service needs. The waiting list relies on completion of a standardized assessment for placement on this list. When a household contacts the crisis line the following steps occur.

**Step 1: Resolve the crisis**

Intake staff will work with the client to best resolve the housing crisis.

- Prevent an eviction
- Access emergency shelter
- Explore alternative resources

**Step 2: Complete an assessment**

If the client(s) are placed in an emergency shelter or are placed on a shelter waiting list, an assessment will be done completed to determine their ongoing needs.

**Step 3: Connect to a housing opportunity**

Once assessed, their name will be placed on a central Housing Waitlist and will be matched to a housing resource that best meets their needs when one becomes available. Providers have a weekly meeting to discuss placement of households on the waiting list and to report opening for available resources.

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

### **Introduction**

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

Dakota County does not establish countywide policies for land use and development. When the CDA has plans for a new development, CDA staff work with city staff in order to meet the zoning and land use requirements of that city. Dakota County CDA maintains its relationship and works closely with all units of government throughout the county to support all affordable housing. This includes support of new rental construction, tenant based rent assistance, new owner construction (e.g. Habitat homes), special needs housing, and housing rehabilitation. Housing advocacy groups and the CDA will continue to work together to further affordable housing opportunities within all communities.

To address potential barriers in individual cities, the CDA has created an incentive program for cities to support affordable housing efforts. In 2006, the CDA created the Redevelopment Incentive Grant (RIG) Program. The RIG Program provides competitive grants of up to \$250,000 to Dakota County cities to assist with redevelopment planning and implementation efforts. To be eligible for funding, cities are required to demonstrate support for affordable housing efforts, and additional points are awarded to cities that include affordable housing in their redevelopment plans. The CDA has provided over \$10 million in grants since the program's inception.

### **Discussion**

The CDA works closely with private developers to address barriers posed by limited access to private financing. The CDA can assist by providing gap financing and working with cities and private developers to provide development support. In 2001, the CDA and Dakota County created the Housing Opportunities Enhancement (HOPE) Program. The HOPE program can provide deferred loans of up to \$750,000 for gap financing for the new construction, substantial rehabilitation, and/or preservation of affordable housing in the County.

To help address Nimbyism, the CDA educates concerned residents about its affordable housing program and works with housing advocacy groups to further affordable housing opportunities within all communities. The CDA holds an open house event at all CDA developed properties for citizens to see what a CDA development looks like and how they are managed upon completion of a project. The CDA also has an annual open house to showcase a few of the different CDA senior developments in the county. Every attempt is made to address concerns of residents.

In the current economic climate, addressing underserved housing needs has become increasingly more difficult. To make housing affordable to very low income households, deep subsidies are needed. Appropriations for housing programs have seen reductions or remain flat and are not at levels to solely support affordability gaps. The CDA will continue to wisely invest its federal funds in viable projects and combine federal sources with other resources so that it can continue to provide Dakota County residents with affordable housing options.

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

### **Introduction**

#### **Actions planned to address obstacles to meeting underserved needs**

The CDA will continue to identify and partner with other organizations to address the needs of those most underserved. The creation of affordable rental housing has been the method used most by the CDA to provide options for seniors and working families. For homeowners, the CDA assists underserved households when looking to purchase a home by providing credit counseling and first time homebuyer education. Additionally, down payment assistance is available. The home rehab program assists households with maintenance and upkeep of their homes with an affordable deferred loan.

#### **Actions planned to foster and maintain affordable housing**

Program Year 2016 funds will be used to provide homeowners rehab loans and rehabilitate or acquire rental properties. The CDA will work to preserve the affordability of units in Low Income Housing Tax Credit properties at the end of their affordability restrictions and project-based assisted units.

#### **Actions planned to reduce lead-based paint hazards**

The CDA will continue to assess homes built prior to 1979 through the Homeowner Rehabilitation Loan program and address any hazards as part of the program if lead-based paint has been identified in connection to the work to be performed.

All residents of properties managed by the CDA (public housing) and Housing Choice Voucher clients will be notified and provide with the pamphlet "How to protect yourself from Lead".

#### **Actions planned to reduce the number of poverty-level families**

Dakota County Community Services division is the main provider of services that address the needs of those in poverty. In partnership with the County, the CDA will refer all those needing additional services beyond the housing assistance and affordable housing opportunities the CDA is able to offer to help those in poverty.

When looking at the potential design of a HOME TBRA program, the CDA will consider ways to achieve self-sufficiency through a step-down approach.

#### **Actions planned to develop institutional structure**

Dakota County designated the Dakota County Community Development Agency (CDA) to administer the CDBG, HOME and ESG programs. Dakota County CDA maintains a strong relationship with County departments, cities, and other agencies (private and non-profit) throughout County.

The CDA was established in 1971 pursuant to special Minnesota legislation to serve the cities and residents of Dakota County. The CDA operates under a 7-member Board of Commissioners appointed by the Dakota County Board, each representing a separate district. The CDA is a separate agency from Dakota County, and as such is able to work with cities and other partners in a manner distinct from Dakota County. This coordinated delivery system works extremely well as an efficient and effective way to centralize housing services for Dakota County.

As the administrator of the CDBG program for the County and the participating cities, the CDA meets individually with each CDBG municipal sub-recipient to discuss the activities, timeliness requirements, and regulations. To help cities understand the CDBG program better, the CDA developed a CDBG manual that details program requirements and the process for allocating and awarding funds. CDA staff also offer an annual CDBG workshop to review the latest funding application, and provide information on one or two HUD regulations (i.e. Davis Bacon, procurement, environmental reviews, etc.).

In addition to the relationships within the County, Dakota County CDA is the lead administrator for the Dakota County Consortium and works with staff from Anoka, Ramsey and Washington counties and the City of Woodbury to implement the activities funded with HOME dollars. The Consortium has monthly conference calls and quarterly in person meetings to discuss any changes in program regulations, monitoring, and the activities being put into operation.

ESG is administered by the CDA but implemented by Dakota County Community Services division. The CDA will review the files for compliance and draw down all funds on a reimbursement basis.

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

Dakota County CDA will continue to attend meetings specifically where public and private housing agencies along with social service agencies convene on a monthly basis. Social service staff deeply connected to the social needs of residents will continue to be partners in the supportive and rapid rehousing programs.

**Actions planned to Affirmatively Further Fair Housing**

The Dakota County CDA proactively complies with the Fair Housing Act and other civil rights laws, including Title VI of the Civil Rights Act of 1964, Section 109 of the Housing and Community Development Act of 1974, Section 504 of the Rehabilitation Act of 1973, and Title II of the Americans with Disabilities Act of 1990 in order to ensure that all people have equal access to the housing of their choice. To support compliance with these fair housing related acts and laws the CDA participates in several Fair Housing activities.

The Fair Housing Implementation Council (FHIC) is a collaborative group representing the Twin Cities metropolitan area entitlement jurisdictions and other governmental

agencies; Dakota County CDA represents Dakota County on the council. The purpose of the FHIC is to facilitate and initiate implementation of activities having metro-wide significance identified in the regional Analyses of Impediments to fair housing choice (AI). In 2014, the FHIC contracted HousingLink to author an AI for 2015-2019. The AI evaluates housing-related policies and practices that may prevent fair housing choice and identified several fair housing impediments. The AI is used as the basis for determining the 2016 Annual Action Plan funding activities.

In 2016, Dakota County will jointly fund and participate in the following fair housing activities to attempt to address the impediments to fair housing choice facing the region and in Dakota County.

- Continue efforts in amending the Analysis of Impediments for 2015-2019.
- Continue to support and market the ECHO rental fair housing video/program. This program is aimed at giving viewers a basic understanding of fair housing: how to find affordable housing, what rights you have, how to be a good tenant, what your landlord must do and cannot do. The video will be available in several different languages.
- The Dakota County CDA's Housing/Rental Assistance department hosts a landlord/owner training annually that is hosted by a Homeline Attorney. The training invites area landlords and property owners to discuss a variety of issues related to rental housing and the HCV program. Fair housing and equal access to housing are covered. Also, monthly landlord/owner workshops are held, which includes a brief discussion on fair housing.
- Through the homebuyer and homeownership resource connection at the CDA homeownership counselors assist potential homebuyers of color and help prepare them for long-term homeownership success. The First Time Homebuyer program may offer additional assistance with down payment and closing costs. Homebuyer Education and Counseling services at the CDA continue to be promoted at Dakota County community events and fairs, city offices, churches, and social service agencies. The CDA also advertises these services on their website.
- The CDA makes available information pertaining to the fair housing complaint process to homebuyers during Homestretch classes and homebuyer counseling.
- Foreclosure literature will continue to be mailed to recipients of Pre-Foreclosure Notices and Notices of Pendency educating them about the foreclosure process and the services offered by the CDA. Dakota County continues to promote the loan scam alert campaign *Look Before You Leap* on the CDA website. Furthermore CDA staff discuss mortgage scams with foreclosure prevention clients by asking the following questions:
  1. Did anyone offer to help modify your mortgage, either directly, through advertising, or by any other means such as a flyer?
  2. Were you guaranteed a loan modification or asked to do any of the following: pay a fee, sign a contract, redirect mortgage payments, sign over the title to your property, or stop making loan payments?The responses will be recorded.



- Fair Housing Ads will be published in the local newspapers during the month of April as part of Fair Housing Month, some of which are targeted to African Americans (Insight News), Asians (Asian American Press) and Latinos (La Prensa).
- Multi-language Fair Housing posters are prominently displayed in the front lobby of the CDA office as well as smaller posters in staff cubicles where staff and program participants meet. The CDA will continue to supply additional posters to the other service organizations at the Affordable Housing Coalition meetings. The Fair Housing symbol will be displayed on all CDA brochures as well as on the CDA website.
- The Fair Housing videos produced by HousingLink are on the main page of the CDA website, as well as a link to an informational Fair Housing page that provides users with guidance and instructions on how to file a complaint as well as resources about Fair Housing.

## Program Specific Requirements

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

#### Introduction

#### Community Development Block Grant Program (CDBG)

#### Reference 24 CFR 91.220(I)(1)

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

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	\$400,000
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan	N/A
3. The amount of surplus funds from urban renewal settlements	N/A
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan.	N/A
5. The amount of income from float-funded activities	N/A
Total Program Income	\$400,000

#### Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	84.00%

#### HOME Investment Partnership Program (HOME)

#### Reference 24 CFR 91.220(I)(2)

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

Dakota County does not plan to use HOME funds for other forms of investment beyond those identified in Section 92.205.

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

Please see, Attachment B. Dakota County HOME Consortium HOME Program Resale/Recapture Policy.

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

Please see, Attachment B. Dakota County HOME Consortium HOME Program Resale/Recapture Policy.

The affordability period of any HOME-assisted units shall be governed by a legal instrument recorded at the appropriate County Recorder's office. This same instrument shall also identify and enforce the resale or recapture provisions of the HOME program. Such documentation shall be provided by the Consortium member and may include one or more of the following depending on the type of project:

1. Resale:
  - a. Deed Restriction; or
  - b. Declaration of Covenant.
2. Recapture:
  - a. Anoka County – Recorded Repayment Agreement and Note;
  - b. Dakota County - Mortgage and Note;
  - c. Ramsey County - Grant of Lien, Note and Declaration;
  - d. Washington County - Mortgage, Note and Declaration;
  - e. City of Woodbury – Mortgage and Note.

The precise nature of the documentation will be identified in the written agreement that governs the usage of the HOME funds in the project. The appropriate Consortium member must be contacted to ensure the correct document for enforcement of the HOME resale/recapture provision is used and recorded.

The HOME written agreement must be a separate legal document from any loan instrument and must, at a minimum, comply with the requirements at 24 CFR 92.504(c)(5) of the HOME rule. If the Consortium member provides HOME funds to a sub-recipient or CHDO to develop and sell affordable housing, the Consortium member must prepare and execute the agreement with the buyer, or be a party to the agreement along with the entity it funded to ensure it can enforce the written agreement.

The executed HOME written agreement with the homebuyer must be recorded at the appropriate County Recorder's office when resale or recapture is used.

For HOME-assisted homebuyer projects under resale or recapture agreements, the Consortium will perform ongoing monitoring of the principal residency requirement during the period of affordability to confirm that the buyer is using the property as his/her principal residence. This can be accomplished through a variety of means, including, but not limited to verification of the buyer's name on utility company records, insurance company records for the home, property records verification, and or postcard or letters mailed with "do not forward" instructions can demonstrate whether the buyer is receiving mail at the home.

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

Dakota County does not plan to use HOME funds to refinance existing debt of multifamily housing.

### **Emergency Solutions Grant (ESG)**

#### **Reference 91.220(I)(4)**

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

Please see Attachment C.

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

Dakota County has established a centralized coordinated entry system, implemented in December 2014. All providers are to direct housing crisis calls to one central number and dependent upon the households composition, while be forwarded to one of three agencies to mitigate the crisis. Once the initial crisis has been resolved, an assessment team will determine if a full assessment is needed. Then, the household is then placed on one centralized waiting list maintained by Dakota County Social Service Division. Homeless program providers are to contact the waitlist administrators when they have an opening available. A secondary team which communicates on a weekly basis reviews the waiting list and supplies the provider with an appropriate referral based upon rank and eligibility criteria for the specific program.

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

See written standards

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

See written standards

5. Describe performance standards for evaluating ESG.

See written standards

### **Discussion**

Attachments:

- A. Citizen Participation Plan
- B. Dakota County HOME Consortium HOME Program Resale/Recapture Policy
- C. ESG Written Standards & Administrative Plan
- D. Dakota County Anti-Displacement Policy
- E. County Board Approval of Action Plan
- F. Statement of Procurement Policy
- G. Limited English Proficiency (LEP)

## Anoka County Affordable Housing

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

#### Introduction

<b>One Year Goals for the Number of Households to be Supported</b>	
Homeless	382
Non-Homeless	71
Special-Needs	
Total	

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

<b>One Year Goals for the Number of Households Supported Through</b>	
Rental Assistance - TBRA	
The Production of New Units	16
Rehab of Existing Units	
Acquisition of Existing Units	
Total	

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

#### Discussion

The total number of households to be served in Anoka County over the next year is 351. This includes County, State and Federal Housing programs listed in Section 91.215(I). The goal over the next year is to continue to serve at this level, ensuring that clients remain housed and therefore no longer experience homelessness. Of those identified as non-homeless the goal would be to prevent an episode of homelessness from ever occurring. In addition, as of July 1, 2016, CommonBond Communities will be opening an affordable housing complex in the City of Ramsey and 4 of the units are prioritized for households who identify as Long Term Homeless, and HOPE 4 Youth will be opening a 12-unit Transitional Housing program with private funding in late 2016.

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

**NOT APPLICABLE**

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

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

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

**Discussion**

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

### **Introduction**

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

#### **1-A Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**

Anoka County has determined the following goals and actions to reach out to homeless persons to assess their needs and reduce their episode of homelessness.

##### **Goals:**

- Increase outreach to homeless persons, providing access to resources and housing, especially youth.
- Increase housing provider participation with Coordinated Entry System (CES).
- Improve referral process for homeless individuals and increase connection to appropriate resources.

##### **Actions:**

- Utilize state PATH funds to conduct outreach to homeless households with mental health symptoms on the street and in shelters. PATH workers meet with the homeless person as many times as needed to gain their trust and help them access services. The PATH workers collaborate closely with service providers to help households' access the Coordinated Entry System.
- HOPE 4 Youth conducts street outreach through Streetworks: a collaboration of 10 youth non-profit agencies meeting the needs to homeless youth. The workers facilitate access to mainstream resources and participate in the CES.
- Educate and train county agency staff and social service agencies to prevent or divert a household from entering the CES and accurately assessing need should deeper services be necessary through Coordinated Entry.
- Review program eligibility criteria to lower barriers to housing, allowing for shortened wait times for households in need.

#### **Addressing the emergency shelter and transitional housing needs of homeless persons**

Anoka County increased the available beds for homeless persons in transitional housing by 16. 12 units are specific to youth, opening in late 2016 and 4 are expected for Veterans. Both populations align with the State's plan to prevent and end homelessness for youth and Veterans. In addition, Anoka County received Family Homeless Prevention and Assistance Program funds for the 2015 – 2017 biennium and targeted a portion of the funds to serve clients in a rapid rehousing model with up to 12 months of rent assistance.



Anoka County's goals and actions to address the emergency shelter and transitional housing needs of homeless persons include:

Goals:

- Increase permanent supportive housing providers with Coordinated Entry System.
- Develop transitional housing opportunities for youth and Veterans.
- Expand Rapid Rehousing through FHPAP funding.

Actions:

- Refer youth from Coordinated Entry to HOPE Place, a 12-bed transitional housing program anticipated to open in November 2016.
- Rapidly rehouse 86 households: singles, families and youth over the next year by providing shallow rent assistance and providing short-term case management.
- PATH outreach worker will expand street outreach activities and provide additional supports to emergency shelters. PATH workers will connect individuals to basic needs, social services, and housing programs.

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

The CoC is the primary entity which oversees the response to chronic homelessness. The CoC has membership from non-profits, local government, homeless advocate organizations, formerly homeless persons and citizens. The CoC sponsors the Continuum of Care planning and implementation, discusses the needs and strategies for chronically homeless citizens. To address homelessness for individuals and families, federal, state and private funding will continue to be solicited to support the development of permanent and permanent supportive housing. Being a member in the CoC helps transitional housing and emergency shelter providers connect with affordable housing providers throughout our region to ensure that people exiting move into permanent housing. The following demonstrates some of the activities that will occur by population:

Chronically homeless Individuals and Families

Goals:

- Continue to prioritize chronically homeless beds through turnover.
- Increase housed households who identify as chronically homeless through CES.
- Develop Continuous Improvement Plan within the CoC for CES evaluation.

Actions: Shorten the period of time homeless

- Evaluate success of programs in moving persons from transitional and emergency shelter to permanent housing.
- Track, in HMIS, both the length of time homeless and the length of time it takes to obtain housing.

CES data is used to determine who is next to be served. Communication with providers regarding vacancies allows for clients to be matched to available programs quickly through the CES Priority List Manager. HMIS is able to track the number of days in emergency

shelter. Data is shared regularly at CoC meetings so providers can evaluate their own programs and make improvements.

Actions: Facilitate access to affordable housing units

- Increase the utilization of state rental vouchers (Bridges).
- Increase the utilization of state housing assistance programs (GRH and MSA)
- Continue to dedicate turnover beds for chronically homeless individuals and families.

Actions: Prevent recidivism

- Continue measuring "return to shelter" within 12 months of exit with our state-funded homeless prevention program (FHPAP) using information from Minnesota's HMIS.
- Continuous quality improvement of CES, ensuring appropriate referrals to agencies so households are served quickly.
- Align homeless prevention efforts with mainstream resources, for example: Social Security benefits, SNAP, and waived services.
- Promote "Housing First" for all supportive housing providers, which helps to minimize barriers and delays to accessing permanent housing.

#### Families with children

Increasing Rapid Re-Housing within the CoC will meet all of the components for families with children, shortening the length of time homeless, facilitating access to affordable housing units and preventing return to homelessness. In addition, the CoC has created a homeless prevention and shelter diversion approach, which can be used on a short-term basis to resolve temporary crisis and avoid returns to homelessness.

Goals:

- Reduce the number of homeless families with children.
- Improve referrals from CES which shortens the length of time families with children are homeless and connects them to appropriate housing.

Actions: Shorten the period of time homeless

- Develop partnerships with police, mental health crisis teams, social workers, and school liaisons to help identify households who become homeless as early as possible.
- Continue use of CES to accurately refer people to the permanent housing.

Actions: Facilitate access to affordable housing units

- Connect families with children to case management services, providing additional housing support to locate affordable units.
- Connect qualified MFIP/DWP families to available RAACS subsidies.
- Provide Tenant-Based Rental Assistance to families transitioning to permanent housing, and support in obtaining employment to sustain housing.
- 

Actions: Prevent recidivism

- Align homeless prevention efforts with mainstream resources, for example Emergency Assistance (EA), Emergency General Assistance (EGA), SNAP, Workforce programs
- Promote "Housing First" for all supportive housing providers, which helps to minimize barriers and delays to accessing permanent housing.
- Analyze CES data to determine trends that may lead to recidivism.

### Veterans

The CoC has made significant progress on ending veteran homelessness. The CoC has active participation from the Minnesota Assistance Council for Veterans (MACV), the VA and VASH programs and county veteran's service staff. To ensure veterans are identified among the homeless population, CoC providers ask clients if they have served in the military as part of the CES. Clients who answer affirmatively are referred to the Veteran's Service Office. The Veteran's Service Office assist veterans to obtain mainstream resources to address their needs.

#### Goals:

- Maintain the SSVF program.
- Decrease number of homeless veterans.
- Increase employment for veterans.

#### Actions: Shorten the period of time homeless

- Anoka County to encourage veterans to access Supportive Services for Veteran Families Program (SSVF).
- Support MAC-V in applying for SSVF funds to continue the state-wide program.

#### Actions: Facilitate access to affordable housing units

- MAC-V to maintain utilization of VASH vouchers across the CoC.
- MAC-V to continue case management and direct services.
- MAC-V to provide housing assistance including rental assistance for first month's rent and security deposit as well as prevention assistance to veterans. This includes limited resources for utility assistance, child care, mortgage, moving costs, and transportation assistance.

#### Actions: Prevent recidivism

- SSVF to provide rapid re-housing of homeless veterans in the communities across the CoC.
- MAC-V's Homeless Veterans Reintegration Program (HVRP) to assist homeless veterans into employment.
- Local providers to coordinate with VA clinic to provide housing services.

### Unaccompanied Youth

The CoC has made progress on ending homelessness among unaccompanied youth through new youth initiatives and has benefited from being a part of the Metro-wide Youth Systems Redesign Council (MYSRC) and supporting the development of Hope 4 Youth, a drop-in center, in Anoka County and the on-going work done by the YMCA through the Youth Support Specialists.

#### Goals:

- Decrease youth homelessness.
- Increase youth outreach via HOPE 4 Youth and Streetworks.
- Support development of HOPE Place, a transitional housing program.

#### Actions: Shorten the period of time homeless

- Find and connect youth to resources through an expanded youth outreach program through Street Works at Hope 4 Youth.
- Support the YMCA's continued work with schools to identify youth who are homeless and help them address family issues and access services.

#### Actions: Facilitate access to affordable housing units

- Accurately refer youth to YMCA for services and assistance through CE.
- Educate YMCA and Hope 4 Youth on Tenant Based Rental Assistance as a housing option for youth.

#### Actions: Prevent recidivism

- Increase resources for outreach.
- Data analysis of returning youth to drop-in Center and/or Youth Resource Line.
- Align homeless prevention efforts with mainstream resources, for example SNAP, Workforce programs, GED

**3A-Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.**

The CoC has adopted State mandate discharge policies for health care facilities, mental health facilities, foster care and corrections programs. In doing so, the CoC coordinates local discharge planning efforts with regional and State programs to ensure that persons being discharged, from their respective facility, are not discharged to homelessness. In addition, The CoC utilizes a CES to streamline access to resources, and ensure appropriate placement of persons being discharged from any of the aforementioned facilities.

Goals:

- Continue coordinating effective discharge plans to all individuals and families.
- Minimize individuals and families from being discharged into homeless.
- Expand network of landlords and service providers.

Actions: Discharge planning: Health Care, Mental Health, Foster Care, Corrections programs and Institutions

- Continue active engagement of representatives from local hospitals, including health care providers, to plan services and make appropriate referrals.
- Streamline referrals for available housing programs and assistance for those exiting institutions (MSA, GRH, Bridges)
- Continue to support the mandate of mental health case management services prior to those being discharged.
- Encourage youth, up to age 21, to work with foster care provider and case management services to develop a housing and employment plan. Each plan to include needs, goals, resources and support system.
- Support State staff in offering assistance to inmates soon to be released. Specialized and specific planning for those inmates with medical and/or mental health issues.
- Build relationships with landlords and service providers that are felony-friendly.

The CoC will continue to address the needs of housing health, social services, employment, education or youth who receive assistance from public and private agencies through the following goals and actions.

Goals:

- Increase the percentage of participants in all housing projects that obtain mainstream benefits at program exit.
- Maximize utilization of HOME funds with administration of Tenant Based Rental Assistance.
- Increase CES outcomes by ensuring those with highest barriers are matched to housing providers quickly.

Actions:

- Anoka County will provide one-time financial assistance through FHPAP to households (individuals, families, and youth) who meet eligibility requirements. If ineligible, households will be referred to other mainstream resources for diversion.
- CDBG HOME program will administer Tenant Based Rental Assistance to those in need and who meet federal eligibility requirements.
- Anoka County will provide prevention resources including deposit, first month's rent, and/or supportive services for families and youth who are at 200% of Federal Poverty Guidelines or below using FHPAP funding.

**Discussion**

# Ramsey County

## Affordable Housing

### AP-55 Affordable Housing – 91.220(g)

#### Introduction

The principal focus has been on helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living. This includes shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again. Much of this activity is done through the Continuum of Care. CDBG and HOME funds are used to supplement and provide housing units where feasible.

Goals listed are specific to the CDBG and HOME funds.

<b>One Year Goals for the Number of Households to be Supported</b>	
Homeless	0
Non-Homeless	165
Special-Needs	0
Total	165

**Table 1 - One Year Goals for Affordable Housing by Support Requirement**

<b>One Year Goals for the Number of Households Supported Through</b>	
Rental Assistance	0
The Production of New Units	12
Rehab of Existing Units	143
Acquisition of Existing Units	10
Total	165

**Table 2 - One Year Goals for Affordable Housing by Support Type**

## **Discussion**

Number of Households to be supported: Homeless – 0 none specifically targeted Non Homeless: First Home - 10 Rehab: 85 Deferred loan programs, Foreclosed Property 4 Home Units Aeon 4 Home units Solid Ground 50 HH

One Year Goals for the Number of Households Supported Through: New Units: Twin Lakes 4 Home Units, Rehab: HRC and NEC 85, Townhome Pilot 4 Home Units, Acquisition: First HOME 10

## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

Ramsey County does not own or operate public housing. The Metro HRA, of the Metropolitan Council, runs the Section 8 program for Ramsey County.

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

N/A

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

N/A

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

N/A

### **Discussion**

See above.



## **AP-65 Homeless and Other Special Needs Activities – 91.220(i)**

### **Introduction**

Ramsey County has worked with service providers to establish a coordinated system that serves homeless and "at-risk of being homeless" individuals, homeless families, and homeless youth. During 2016, the Ramsey County Continuum of Care Coordinator and 18+ community agencies to create comprehensive homelessness prevention delivery services that can assist homeless single adults, homeless families, and homeless unaccompanied youth.

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

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

People, Inc. provides 2 FTEs for street outreach, engagement and case management with unsheltered individuals throughout the CoC. Services begin with contact and engagement thru provision of survival gear and referrals to resources, assistance with transportation, and filling out applications for benefits. In the process, as a relationship develops, outreach workers offer low barrier housing options and partner with a variety of other providers and programs to offer assessment, diagnostics, and on-going primary care as needed. Streetworks is a collaborative of 11 youth providers that engages with youth on the street 7 nights per week to engage, offer help, give referrals, meet survival needs and stress harm reduction.

#### **Addressing the emergency shelter and transitional housing needs of homeless persons**

Access to assistance, shelter and housing has been greatly improved through the development of coordinated assessment. Coordinated Access to Housing and Shelter (CAHS) is our streamlined entry system for all homeless families, providing a centralized location for shelter diversion, shelter intake, assessment and referral to the most appropriate housing and service site. Coordinated assessment ensures that people get the level of assistance they truly need, and prioritizes the use of available resources to those most in need.

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

See above. The key factor in developing housing stability, shortening the length of time someone experiences homelessness, and minimizing the repeated episodes of homelessness is having an easily

accessible, standardized assessment process that accurately determines need and directs people into the most appropriate housing and level of service quickly and efficiently. Before the advent of coordinated assessment, the onus was completely on homeless people in crisis to navigate a complex network of providers, completing multiple applications and undergoing multiple assessments.

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

State funded Family Homeless Prevention and Assistance Program and Emergency Solutions Grant funding is used to provide homeless prevention and shelter diversion programming to assist people at risk of homelessness. In-reach into hospitals, jails and prisons, and treatment facilities helps to connect people at risk of homelessness prior to discharge with needed assistance.

## **Discussion**

The primary focus in Ramsey County has been on helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living. This includes shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again. Ramsey County is working to incorporate organizations that provide employment training to previously incarcerated persons with other county projects.

## **AP-75 Barriers to affordable housing – 91.220(j)**

### **Introduction:**

Barriers to affordable housing will be addressed by providing resources in areas where there is a shortage of affordable units. In 2016, HOME and CDBG will be used in suburban Ramsey County to assist in the development of new affordable units, rehabilitating existing affordable single and multi-family housing units, providing homeownership assistance, and infrastructure to support redevelopment and infill construction of new affordable units.

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

**Lack of Land for Publicly-Assisted Housing** Major barriers to developing publicly-assisted affordable housing in Ramsey County are the lack of sufficient funds and lack of available land.

**Lack of Sufficient Funding** Ramsey County will use HOME funds to support new construction of affordable units for families and seniors, preservation of naturally-occurring affordable rental units, and working with developers to leverage additional funds such as LIHTC, Project Based Vouchers, and Minnesota Housing funds.

### **Discussion:**

So many of the barriers to affordable housing are out of the direct control of the County, as there are no unincorporated areas. Most regulations, such as Zoning Code/Land Use Controls/Growth Limitations are statutorily restricted to cities. The County does work in partnership with cities to address these where feasible, providing technical assistance and partnership to attract and work with developers.

## Washington County

### AP-55 Affordable Housing

#### Introduction

The 2016 projects will support affordable housing for general populations as well as targeted populations. In 2016, Washington County will continue to focus its CDBG funding towards the development and/or preservation of affordable housing. The affordable housing will be in three key categories, 1) owner occupied housing repairs and rehabilitation 2) Community Services and 3) the development of new housing. Crisis assistance and services are provided to prevent homelessness as well as the acquisition of a townhome in Oakdale, which will house a family for rental who otherwise would have to face homelessness due to being victims of domestic violence and exhausting their time in the transitional shelter.

#### Affordable Housing Goals

One Year Goals for the Number of Households to be Supported	
Homeless	1
Non-Homeless	16
Special-Needs	8
Total	25

**Table 1 - One Year Goals for Affordable Housing by Support Requirement**

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	6
Rehab of Existing Units	19
Acquisition of Existing Units	0
Total	25

**Table 2 - One Year Goals for Affordable Housing by Support Type**

#### Discussion

Affordable housing is the highest priority in Washington County. Program Year 2016 goals include the production and/or rehabilitation of 25 affordable rental and home ownership units.

## **AP-60 Public Housing**

### **Introduction**

The Washington County HRA administers all of the public housing units in Washington County. Of the 63 public housing units, 40 are located in the four-story Whispering Pines Apartments in Forest Lake and 23 are scattered site detached single family home or townhome units. Whispering Pines was substantially rehabilitated in 2012 and it is in excellent physical condition. The scattered site homes maintained through Washington County HRA's capital improvement program with regular inspections and improvements made as needed to keep the properties also in excellent condition.

### **Actions planned during the next year to address the needs of public housing**

The Washington County HRA's capital improvement plan identifies future needs and cost estimates on a replacement reserve schedule to ensure a good living environment for the residents. At Whispering Pines Apartments in 2015, a deck was replaced and kitchen rehabilitated to remediate mold due to a slow leak. In the 2016 budget, scheduled is a rehabilitation of panel access, mechanical and plumbing improvements, and a parking lot extension.

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

The Washington County HRA has a number of avenues for public housing residents to become involved in the management of public housing units. One way is through Resident Councils. There is a Resident Council that represents those in the Washington County HRA's scattered site public units as well as those in its Housing Choice Voucher program. There is another Resident Council that represents the Whispering Pines public housing community. Each Resident Council elects a board that plans events and provides educational opportunities to enhance resident quality of life by providing. Resident Council meetings are held on a regular monthly basis.

Another way for a resident to become involved is to participate on the Resident Advisory Board. This board is made up of each Resident Council elected board (Chair, Vice-Chair, and Secretary), in addition to the Resident Commissioner that serves on the Washington County HRA Board of Commissioners. The Resident Advisory Board provides strategic direction by reviewing and assisting in the development of the HRA's short and long term housing plans.

The Resident Commissioner serves on the Washington County HRA Board of Commissioners and is another potential way for a resident to become involved in management. This board is made up of seven members and makes decisions regarding the Washington County HRA's programs and funding. The Board actions are accountable to Washington County.

Homeownership is encouraged through the Washington County HRA's Public Housing Family Self Sufficiency Program (FSS). Currently, the Washington County HRA program has 32 participants. The Family Self-Sufficiency (FSS) program enables public housing residents to increase their earned income and reduce their dependency on welfare assistance and rental subsidies. Under the FSS program, low-income families are provided opportunities for education, job training, counseling and other forms of social service assistance, while living in assisted housing, so they can obtain skills necessary to achieve self-sufficiency. This would include encouragement to participate in homeownership. In 2015, 10 of the 32 participants graduated with escrow accounts and 1 participant purchased a home. The program anticipates a similar number of participants and graduates for 2016.

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

Not applicable.

**Discussion**

The public housing units in Washington County are in good physical condition. The Washington County HRA provides on-going maintenance and capital improvement projects to ensure the safety and quality in public housing. Washington County HRA values its residents and encourages their participation and involvement in policy and decision making.

## **AP-65 Homeless and Other Special Needs Activities**

### **Introduction**

The Washington County Housing Collaborative (WCHC) is a member of the Suburban Metro Area Continuum of Care (SMAC) and provides local representation to the governing board. The WCHC has active participation from the community including citizen representation, non-profit, local government and persons that have experienced homelessness. The homeless response system provides both services for persons experiencing homelessness and prevention services. The system is comprised of; County Community Services Department, non-profit and faith based organizations and the county Public Housing Authority.

### **Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**

To address homelessness for singles, families, and youth, federal, state and private funding will continue to be solicited to support the development of permanent and permanent supportive housing. In the most recent CoC funding request, the SMAC included a bonus project request of \$468,901 for a new Rapid Rehousing youth project and \$106,144 of reallocated dollars to support a new youth coordinated entry project. Both projects will provide additional support and housing to help reduce youth homelessness. In addition, \$3,019,863 was requested to fund 24 renewal projects in the region.

Washington County implemented a coordinated entry (CE) system in January of 2015 that ensures broad awareness and rapid access to the assessment process that connects singles, families, and youth to housing programs most aligned with their needs. The CE system is a four step process and uses outreach and community education to ensure all persons in housing crisis are identified and aware of the access points to receive an assessment. Step 1 is a common assessment tool that addresses the safety of the household and triages households who can be diverted from homelessness from those who need further housing assistance. Step 2 uses the VI-SDAT assessment tool to identify housing stability barriers. Households receive a score indicating the type of housing that best fits the household's needs. Step 3 puts households onto a priority list based on assessment score and date. Step 4 refers households to a housing provider. The CE system prioritizes the most vulnerable including chronically homeless and veterans. The goal for 2016 is to assure the align Washington County CE system is aligned with the state CE policies and guidelines. Additional marketing and community education of the CE process is being planned for 2016 to insure all homeless persons especially unsheltered are aware of the points of entry.

The WCHC will be studying the data collected from the CE system to identify gaps in the homeless response system. Action steps will be developed to address the needs of the community. System and program barriers have started to be identified and action is being taken to move programs toward low-barrier or housing first.

SMAC is working closely with the State Office to End Homelessness to identify goals and priorities for 2016 to meet the Minnesota Heading Home plan and local plans timeline to end

homelessness. SMAC has prioritized, with the state, of ending veteran homelessness by the end of 2015 and is on track to meet the goal. The state has set the goals of:

- End Chronic Homelessness in 2017
- Prevent and end homelessness among unaccompanied youth in 2020
- Prevent and end homelessness among families with children in 2020
- Sustain an end of homelessness among Veterans

**Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including addressing the emergency shelter and transitional housing needs of homeless persons**

Washington County maximizes its 15% CDBG public services cap for crisis assistance to families at risk for homelessness or currently homeless. A portion of the public services dollars are allocated to provide a Family Services Worker to advise and counsel homeless persons and persons at risk of being homeless, providing resources and referrals. It is projected that 500 people will be assisted. The crisis assistance program is projecting to provide help to 40 families in 2016. The program provides direct financial resources including emergency shelter, rent deposit and rent payment assistance.

Washington County started the Coordinated Entry system at the beginning of 2015. The system assesses individuals and families vulnerability and housing needs. People are assessed for diversion leaving emergency shelter and transitional housing spots open for those most in need. The SMAC region has several options if emergency shelter is needed. The CE system has shown the SMAC region a gap in shelter services; a meeting is being planned to pull together representation from each of the SMAC counties to discuss the issue and start putting together an action plan to address the need for additional shelter. Washington County, the shelter options include: Washington County hotel/motel shelter paid for by Washington County Community Services department (CDBG and Emergency Assistance), St. Andrews Church hotel/motel shelter paid for by St. Andrews Church in Mahtomedi, Hope for the Journey Home Shelter (eight units for families), and Tubman Shelter for households experiencing domestic violence (located in Ramsey County but has designated beds for Washington County residents).

Washington County has a strong faith community dedicated to helping homeless families. The Forest Lake Area Mission for Families, a group of church members located in the northern part of the county, is currently working on creating a family shelter in the Forest Lake area. The group is in the process of acquiring funding and looking for a building for the shelter.

Within the SMAC region, most of the transitional housing programs have moved to a Rapid Rehousing (RRH) model. Over the next year, the CoC will develop a set of standards for all CoC funded RRH to follow and will encourage non-CoC funded projects to adhere to the standards. Common language and standards will help with the coordinated entry system and create a more transparent system.

**Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including helping homeless persons (especially chronically homeless individuals and families,**



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

The Coordinated Entry system was developed to most efficiently and quickly utilize the resources available in the community. The goal of the system is to; identify, assess level of need, and determine most appropriate housing to meet the needs of the family and quickly match families to providers. CoC funded providers have been strongly encouraged to ensure programs have low-barriers to entry and to use the housing first model. The Housing Collaborative has begun discussions with non-CoC funded providers to look at ways they can also make programs have low-barriers to entry. As part of the CE process, people will be referred to and connected to main stream resources to assist in shortening the time persons remain homeless.

The Family Homeless Prevention and Assistance Program managed by Washington County will provide rental assistance for families with children, singles and youth:

- Received \$324,848.00 for the grant period of 7/1/2015-6/30/2017
- Will serve 217 households; 110 projected for prevention services, 147 for homeless assistance

### Veterans

A state wide Homeless Veteran Registry was developed in 2015 to create a sustainable housing plan for every veteran experiencing homelessness and leveraging all available resources. The CE system will identify veterans and will be prioritized on the Priority List and facilitate connecting the veteran to veteran specific services and resources, including the Registry. With the veterans permission, a team comes together to identify the resources best suited to help the veteran obtain stable housing.

### Unaccompanied Youth

During the CoC funding request, the SMAC region submitted two youth focused grants to assist in ending youth homelessness. The first grant will be to fund a metro-wide CE system for youth. This will allow greater coordination and choice of housing for youth. The second request was for the bonus dollars available to the CoC with a request for additional rapid rehousing units for youth in the SMAC region.

### Families with Children

The coordinated entry process ensures broad awareness and rapid access to the system, providing timely assessments that connect family's to housing programs that will best meet their needs. The CE policies have been designed to assure families are contacted and referrals are made timely. The system also assesses families to assure they are referred to the most appropriate housing to meet their needs, reducing the incident of returning to homelessness. In 2016, additional community training on Housing First and low barrier practices will be provided to ensure that an eligibility criterion does not cause delays for families seeking to

access housing.

**Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs**

In 2016, Washington County will utilize 15% of its CDBG funds for public services to serve up to 540 households. Direct financial resources, including emergency shelter, rent deposit and rent payment assistance will be used by up to 40 of those households. The program provides direct financial resources including emergency shelter, rent deposit and rent payment assistance. CDBG funds are used to assist clients to achieve stable housing. The direct financial assistance (called "crisis assistance funds") is used largely for shelter, rent deposit and rent payment assistance.

Other one-year goals and actions for reducing and ending for extremely low-income individuals who are being discharged from publicly funded institutions and systems of care are as follows:

Foster Care: The CoC has adopted discharge policies that coordinate discharge planning efforts with local programs to ensure that no one is discharged from foster care without a stable home. In accordance with Minnesota statutes, the CoC has developed discharge policies which include extension of foster care up to age 21 and all youth receive notice regarding their rights. Foster care youth may stay in foster care until age 21 or choose to live independently and work with their case manager to identify and secure a permanent housing option, including accessing resources for a damage deposit, and rent payment assistance. Youth may also reside in college campus housing. All youth transitioning from foster care are assisted to develop a discharge plan with their assigned county case manager that must include housing and employment options. Each plan includes needs, goals, resources and a support system and requires foster care providers and county case managers participate.

The CoC engages foster care workers in planning efforts to ensure they are aware of programming available for permanent housing upon discharge. The workers are invited to meetings and are aware of resources available before the youth is discharged. For those who are most at risk, case managers identify long term programming. The CoC utilizes funding from Minnesota Department of Human Services for youth under the Healthy Transitions and Homeless Prevention grants for the purpose of securing housing, life skills training, education planning, and job seeking. For those youth who do find themselves in need of supportive housing upon release from foster care, funding for supportive housing for youth is available under the Minnesota Legislature under the Minnesota Homeless Youth Act.

Health Care: The State and CoC both mandate discharge policies. The CoC has adopted discharge policies and coordinates local discharge planning efforts with regional and State programs to ensure that persons discharged from health care facilities are not discharged to homelessness. Health care providers have been provided with the coordinated entry procedures and access points. The CoC has piloted a Hospital to Home model to target supportive housing resources to those existing hospitals with high housing needs and medical vulnerabilities. Persons discharged from long term facilities are commonly discharged to sober housing; group residential housing and CoC funded rental assistance programs with services. Statewide resources are available through the “money follows the person” rebalancing demo project to transition people from health care institutions to the community.

Mental Health: The county receives a state adult mental health grant and PATH grant which are directed to persons who are mentally ill and homeless which addresses a special needs population (mentally ill) and is a high priority of the Consolidated Plan. Funds are used for emergency housing and services to identify and attain permanent housing.

The CoC has an adopted a discharge policy to ensure no one is discharged from a mental health facility without a stable home to live. In addition, the state mandates all persons committed to any of the state regional treatment facilities are assigned a mental health case manager. Discharge planning begins while the individual is committed and before the person is discharged. Housing remains a part of the treatment plan after discharge to ensure housing is maintained and sustained. The plans includes case management services, housing, employment, medical and psychiatric treatment, and aid in the readjustment to the community. The CoC has received a special allocation of state funded rental assistance resources designed to facilitate smooth and stable transitions from state psychiatric hospitals to community based living. Persons discharged from mental health treatment are commonly discharged to community based supportive housing, adult foster care, state-funded housing or other publically funded programs.

The CoC has a network of collaborating agencies that ensures persons who are discharged from a mental health facility are not discharged to homelessness. Partners include county mental health case managers and social workers, nonprofits that specialize in serving clients with mental health needs, and the State of Minnesota. Discharge planning is a component of the Adult Mental Health Initiative plans, which guide the actions of county and contracted mental health service providers. These plans specifically include local homeless service providers and ensure coordination with local and regional homeless networks plans to end homelessness. Multiple mental health service providers are active members of the CoC and provide services to persons leaving mental health facilities using non-HUD McKinney Vento resources. These providers have extensive experience in mental health services and provide technical expertise to inform our CoC planning to ensure persons are not discharged to homelessness.

Corrections: The CoC has adopted discharge policies that reflect policy enacted by the Minnesota Department of Corrections (DOC). For individuals incarcerated in a state

correctional facility, state staff is required to offer assistance with release planning. Inmates who have a specific medical and/or mental health issue are offered specialized and focused release planning assistance. Corrections have been provided with the CE points of access information. Eligible offenders are typically housed in halfway houses and emergency housing placements until permanent housing is secured. The CoC is actively building relationships with landlords and service providers that are felony-friendly and has aggressively sought additional housing resources for persons being discharged from the corrections system. The DOC is primarily responsible for preventing offenders from being released from state facilities into homelessness. The DOC provides a case manager to assist with identifying and connecting the client with appropriate resources. DOC adult offender re-entry services and programming provides reentry services to offenders in collaboration with case management services, including the prisoner re-entry initiatives, transition fairs, offender housing contracts, referrals, and prerelease classes. DOC provides payment for adult halfway house and emergency housing placement for eligible offenders that are on supervised release. The CoC has several reentry initiatives in progress.

## **Discussion**

Washington County's Housing Collaborative acts as the local Continuum of Care committee for this part of the Suburban Metro Area Continuum of Care (SMAC) region. Organizations within the continuum provide a number of homeless services and resources. The "prevention" end of the Continuum is largely made up of Washington County's Housing Unit and Emergency Assistance Unit, nonprofits and faith based organizations.

Clients accessing assistance from public and private agencies enter the system through multiple doors. The Housing Collaborative, in conjunction with SMAC, created a more coordinated assessment system for those that enter these multiple doors so that they can access appropriate resources quickly. Washington County is developed the coordinated entry tool to help determine which households need prevention, which households need diversion assistance and which households need shelter.

## City of Woodbury

### Affordable Housing

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

##### Introduction

The PY2016 projects will support affordable housing through a senior housing lens. Not only will the proposed redevelopment of the Carey Parcel add to the very limited number of affordable senior units in the City, it will also help the Washington County HRA—one of the City’s key housing partners—build capacity. Separate from the HUD-funded activities, the City’s municipal HRA continues to offer loans to low- and moderate-income households both to achieve ownership and well as rehabilitate existing housing stock.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	42
Special-Needs	0
Total	42

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	42
Rehab of Existing Units	0
Acquisition of Existing Units	0
Total	42

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

##### Discussion

Affordable housing is a high priority for the City of Woodbury. PY2016 will be an exciting year for the City as both the Carey Parcel and other developments will lead to enhanced opportunities for low- and moderate-income households.

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

### **Introduction**

The Washington County HRA (WCHRA) administers all of the public housing units in Washington County including within the City of Woodbury. According to the WCHRA, of the 63 public housing units, 40 are located in the four-story Whispering Pines Apartments in Forest Lake and 23 are scattered site detached single family home or townhome units. Whispering Pines was substantially rehabilitated in 2012 and it is in excellent physical condition. The scattered site homes maintained through WCHRA's capital improvement program with regular inspections and improvements made as needed to keep the properties also in excellent condition.

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

The WCHRA's capital improvement plan identifies future needs and cost estimates on a replacement reserve schedule to ensure a good living environment for the residents. In 2016, parking lot improvements are scheduled at Whispering Pines Apartments.

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

The Washington County HRA has a number of avenues for public housing residents to become involved in the management of public housing units. One way is through Resident Councils. A Resident Council represents those in the Washington County HRA's scattered site public units as well as those in its Housing Choice Voucher program. There is another Resident Council that represents the Whispering Pines public housing community. Each Resident Council elects a board that plans events and provides educational opportunities to enhance resident quality of life. Resident Council meetings are held on a regular monthly basis.

Another way for a resident to become involved is to participate on the Resident Advisory Board. This board is made up of each Resident Council elected board (Chair, Vice-Chair, and Secretary), in addition to the Resident Commissioner that serves of the Washington County HRA Board of Commissioners. The Resident Advisory Board provides strategic direction by reviewing and assisting in the development of the HRA's short and long term housing plans.

The Resident Commissioner serves on the Washington County HRA Board of Commissioners and is another potential way for a resident to become involved in management. This board is made up of seven members and makes decisions regarding the Washington County HRA's programs and funding. The Board actions are accountable to Washington County.

Homeownership is encouraged through the Washington County HRA's Public Housing Family Self Sufficiency Program (FSS). In 2014 the Washington County HRA program had 32 participants. The Family Self-Sufficiency (FSS) program enables public housing residents to increase their earned income and reduce their dependency on welfare assistance and rental subsidies. Under the FSS program, low-income families are provided opportunities for education, job training, counseling and other forms of social service assistance, while living in assisted housing, so they can obtain skills

necessary to achieve self-sufficiency. This would include encouragement to participate in homeownership. Additionally, Woodbury's municipal HRA offers first-time homeownership financing as well as a variety of advocacy and educational opportunities to the community.

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

N/A.

**Discussion**

Woodbury has no project-based public housing, but the scattered-site units within the City are well maintained. The Washington County HRA provides on-going maintenance and capital improvement projects to ensure the safety and quality in public housing.

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

### **Introduction**

Washington County's Housing Collaborative acts as the local Continuum of Care committee for this part of the metropolitan region. Organizations within the Continuum provide a number of homeless services and resources. The prevention end of the Continuum is largely made up of Washington County's Housing Unit and Emergency Assistance Unit, nonprofits and faith based organizations. Woodbury hosts one Section 42-financed apartment building, the Views at City Walk that was designed to accommodate the architectural needs of households with special needs.

### **Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**

The Continuum of Care Committee (CoC) uses the following approaches to reduce the length of time homeless and end long term homelessness.

**Outreach:** Street outreach, teams that have developed partnerships with police, mental health crisis teams, and school liaisons to help identify households who have become homeless as early as possible.

**Coordinated Assessment:** Through this program, SMAC has improved mapping of resources and our ability to accurately refer people to the right models. Assessments will be conducted within 10-14 days of shelter entry, referrals and placement within 21 days.

**Prevention/Diversion:** State and private funding provide a number of prevention and diversion programs for homeless households including direct financial assistance, support services, housing search assistance and other options to resolve housing emergencies. Washington County's Emergency Assistance Program and Washington County's CDBG public services program also provide prevention/diversion services. To address homelessness for individuals and families, federal, state and private funding will continue to be solicited to support the development of permanent and permanent supportive housing. Being a member in the CoC helps transitional housing and emergency shelter providers connect with affordable housing providers throughout our region to ensure that people exiting move to permanent housing.

### **Addressing the emergency shelter and transitional housing needs of homeless persons**

Washington County HRA maximizes its CDBG public services cap for crisis assistance to families at risk for homelessness or currently homeless. Support services provide approximately 500 households annually with stabilizing assistance. The program provides direct financial resources including emergency shelter, rent deposit and rent payment assistance.

To address the needs of homeless persons and most efficiently utilize the resources, a Coordinated Access system has been developed. The system has been designed to meet the specific needs of Washington County with coordination with SMAC and the state to assure consistency across



counties state wide. Washington County has three points of access for people experiencing homelessness: Canvas Health for youth, St. Andrew's Community Resource Center for families, and Washington County Community services for singles. An initial assessment is conducted to determine if the person or family can be diverted from homelessness with connections to resources. If it is determined housing is needed, a full assessment is conducted to determine the type of housing needed; shelter, rapid rehousing, transitional housing or permanent supportive housing.

The SMAC region has several shelter options if emergency shelter is needed. In Washington County, the shelter options include: Washington County hotel/motel shelter paid for by Washington County Community Services department (CDBG and Emergency Assistance), St. Andrews Church hotel/motel shelter paid for by St. Andrews Church in Mahtomedi, Hope for the Journey Home Shelter (eight units for families), and Tubman Shelter for households experiencing domestic violence (located in Ramsey County but has designated beds for Washington County residents).

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

SMAC will provide Rapid Rehousing (RRH), primarily thru State funding. All SMAC RRH projects are evaluated based on two measures: a) minimize the length of time homeless and b) limit repeat episodes of homelessness. SMAC promotes Housing First for all supportive housing, which helps to minimize barriers and delays to accessing housing.

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

There are four key institutional releases which Washington County is most concerned. They include aging out of foster care, discharges from mental health facilities, discharges from correctional facilities and discharges from hospitals. Protocol is in place in Washington County and in the state of Minnesota that no one is discharged from foster care without a stable home. Washington County has a discharge plan with all foster care youth at age 16 to assure that youth receive notice regarding their rights. They may stay in foster care until age 21 or choose to live independently and work with their case manager to identify and secure a permanent housing option. Discharge plans include housing and employment options.

Protocols are in place so that no one is discharged from a mental health facility without a stable home in which to live. Per state mandate, all persons committed to any of the state regional treatment facilities are assigned a mental health case manager through the county of the person discharged. Discharge planning begins while the individual is committed and before the person is discharged. Housing remains a part of the treatment plan after discharge to ensure housing is maintained/sustained. The plans includes case management services, housing, employment, medical and psychiatric treatment, and aid in the readjustment to the community. In addition, the CoC has received a special allocation of state-funded rental assistance resources designed to facilitate smooth and stable transitions from state psychiatric hospitals to community-based living.

On a statewide level, the current discharge policy reflects policy enacted by the Minnesota Department of Corrections with statutory authority granted by the MN Legislature. MN Department of Corrections (DOC) provides a case manager to offenders and discusses the role of a case manager. In situations where an individual has no placement options or would be homeless follow release, the case manager assists with identifying and connecting the client with appropriate resources. DOC Adult Offender Reentry Services and Programming provides reentry services to offenders in collaboration with case management services. This includes the Presidential Prisoner Reentry Initiative (PRI), transition fairs, administering offender housing contracts, providing referrals, and offering a pre-release class to offenders. DOC provides payment for adult halfway house and emergency housing placement for eligible offenders that are on supervised release and conditional release. The CoC has been actively engaging representatives from local hospitals and health care providers in 10-year plans to end homelessness. Committees work with hospitals to plan services and referral processes to assist persons being discharged. Releasing medically fragile people who do not have housing is a growing problem. There are medical respite beds available in the metro area and the CoC continues to work with other providers to establish a program that will house persons being released from hospitals without housing to go to. They will be able to stay in this housing until their medical needs are met or permanent housing with needed services is found.

## **Discussion**

Washington County's Housing Collaborative acts as the local Continuum of Care committee for this part of the SMAC region. Organizations within the continuum provide a number of homeless services and resources. The "prevention" end of the Continuum is largely made up of Washington County's Housing Unit and Emergency Assistance Unit, nonprofits and faith based organizations. Clients accessing assistance from public and private agencies enter the system through multiple doors. The Housing Collaborative, in conjunction with SMAC, is working to create a more coordinated assessment system for those that enter these multiple doors so that they can access appropriate resources quickly. Washington County is currently piloting a tool to help determine which households need prevention, which households need diversion assistance and which households need shelter.

# CITIZEN PARTICIPATION PLAN

## DAKOTA COUNTY CONSORTIUM

Anoka County/Dakota County/Suburban Ramsey County  
Washington County/City of Coon Rapids/City of Woodbury

### 1. Introduction

The Citizen Participation Plan, hereafter referred to as CPP, is the framework that sets forth the policies and procedures the Dakota County Consortium will follow to provide for and encourage public participation in the development of the jurisdictions' Consolidated Plan and Assessment of Fair Housing (AFH). The goal is to involve and partner with all local citizens, neighborhoods and areas impacted in the implementation of the housing and community development programs provided by the Consortium members. The CPP also applies to any substantial amendments to the Consolidated Plan, to the preparation of the Annual Action Plans, to the performance report which evaluates the progress in meeting the Consolidated Plan objectives and to the AFH.

The provisions of the CPP fulfill the statutory and regulatory requirements pursuant to 24 CFR parts 91 et al, the Dakota County Consortium is required to adopt as formula grantees of HUD entitlement fund programs. The Dakota County Consortium receives entitlement funds from the following three programs: Community Development Block Grant (CDBG), the HOME Investment Partnership (HOME) and Emergency Solutions Grant (ESG)<sup>1</sup>. These programs provide approximately \$6 million in federal grants for community economic development and housing priorities. The Dakota County Consortium also applies for other federal funding such as Shelter Plus Care (S+C), Supportive Housing Program (SHP) and Neighborhood Stabilization (NSP) to achieve its objectives.

This is the overall Citizen Participation Plan for the Dakota County Consortium. Each member community must meet the minimum requirements set forth herein. However, members are free to add opportunities for citizen participation beyond those required here.

### 2. Definitions

The Dakota County Consortium, here on referred to as *the Consortium*, members are made up of Anoka County, Suburban Ramsey County, Washington County, the City of Coon Rapids and the City of Woodbury. Dakota County is the lead agency for the Consortium and has appointed the Dakota County Community Development Agency (CDA) the lead entity responsible to oversee the administration of the Consortium and submit all consolidated planning documents to HUD.

Each Consortium member is considered a formula grantee for CDBG funds on their own; as an authorized formation for the purpose of receiving HOME funds; and Dakota County only receives ESG funds. A fourth grant, which the Consortium is not a direct recipient of, Housing Opportunities for Persons with AIDS (HOPWA), is regionally covered by the City of Minneapolis who administers HOPWA funding for the metropolitan area.

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<sup>1</sup> Dakota County is the only direct entitlement recipient of ESG funds.

A *federal formula grant* is awarded to a jurisdiction based upon a formula that takes into account factors such as the number of households in poverty, age of housing stock, population and economic growth, and in the case of HOPWA, the number of reported cases of people with AIDS in the metropolitan area. The U.S. Congress appropriates federal grants annually so each grant amount may vary from year to year.

Each grant fund is subject to specific regulatory requirements and has specific applications for which the funds can be spent.

- *The Community Development Block Grant (CDBG)* is a flexible program that granted to larger cities and urban counties to develop viable communities by providing decent housing, a suitable living environment, and opportunities to expand economic opportunities
- *The HOME Investment Partnership (HOME)* provides formula grants to States and localities that communities used-often in partnership with local nonprofit groups-to fund a wide range of activities that build, buy, and/or rehabilitate affordable housing for rent or homeownership or provide direct rental assistance to low-income people.
- *The Emergency Solutions Grant (ESG)* recipients are state governments, large cities, and urban counties who provide assist for individuals and families quickly regain stability in permanent housing after experiencing a housing crisis or homelessness.
- *Housing Opportunities for Persons with AIDS (HOPWA)* is provided to the eligible metropolitan statistical area (EMSA) and can be used for a variety of housing and services for people living with HIV and their families.

As recipients of these formula grant funds, the Consortium is required to produce the following documents:

- *The Consolidated Plan* is a five-year planning document intended to established a unified vision for community development, outlines coordinated strategies to address community needs related to housing and economic development, identifies proposed programs and establishes goals and projected accomplishments over the five-year period.
- *Annual Action Plan* is the annual planning document that describes how the specific federal formula funds are going to be spent over the course of the upcoming program year and the projects that will be undertaken to accomplish the strategies and goals that were set forth in the five-year Consolidated Plan.
- *Consolidated Annual Performance and Evaluation Report (CAPER)* is the annual report that evaluates the uses of the formula grants, outlines the yearly expenditures, and assesses the jurisdictions' progress at implementing their Annual Action Plan as well as reaching the goals set in the five-year Consolidated Plan.
- *Assessment of Fair Housing (AFH)* is an analysis of fair housing issues in the Consortium's jurisdictions and region that results in goals that inform the strategies and actions of the Consolidated Plan and the Annual Action Plan.<sup>2</sup> *Substantial Amendments*

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<sup>2</sup> Until a program participant submits its first AFH, the program participant must continue to comply with applicable fair housing planning procedures, meaning that it should comply with the exiting Analysis of Impediments (AI) to fair housing choice requirements by having an up-to-date AI and taking action to affirmatively further fair housing in accordance with the AI. The Consortium's first AFH is due 270 days prior to the program year for which a new five-year Consolidated Plan is due. The Consortium's next Consolidated Plan is due July 1, 2020 therefore the AFH will be due October 4, 2019.

is an amendment to any the aforementioned documents by which a “substantial change” in priority need/objective or planned activity is to occur. A “substantial change” is defined further in the Citizen Participation Plan.

The Consortium’s fiscal/program year runs July 1 through June 30; therefore it must submit the Annual Action Plan and the Consolidated Plan by May 15 each year; the CAPER by September 28 of each year.

The intent of the grants is to principally benefit low – and moderate–income persons or low-and moderate-income neighborhoods:

- *Moderate-income* is a household whose income is 80% or less of the area median income (AMI).
- *Low-income* is a household whose income is below 50% AMI.
- *A low-and moderate-income neighborhood* is a geographic area where more than 51% of the households have incomes that are at or below 80% of AMI.
- *Area Median Income (AMI)* is the median income determined by HUD for a particular area. HUD sets the area median income each year by publishing a table that shows median income for households of different sizes. Find the area median income table at: <http://www.huduser.org/portal/datasets/il.html>

All members of the Consortium are a part of the Minneapolis-St. Paul-Bloomington MSA.

### **3. Encouraging Citizen Participation**

Interested groups and individuals are encouraged to provide input into all aspects of the Consortium’s consolidated planning activities – from assessing needs and setting priorities through performance evaluations. The CPP outlines the Consortium’s responsibility for providing opportunities for active participation from citizens of all income levels to contribute information, ideas, and opinions about ways to improve our neighborhoods, promote housing affordability, and enhance the delivery of public services to local residents.

In developing its Consolidated Plan, Annual Action Plans, Substantial Amendments, CAPER and AFH, the Consortium will take appropriate actions to encourage citizen participation by all residents of the Consortium-member communities, emphasizing the involvement of:

- Low-and moderate-income persons, particularly those living in areas where federal funds are proposed to be used;
- Residents of predominantly low-and moderate-income neighborhoods;
- Minorities;
- Persons with Limited English Proficiency;
- Persons with disabilities;
- Residents of public and assisted housing developments; and
- Local and regional institutions, the regional Continuum of Care (known as SMAC) and other organizations including businesses, developers, nonprofit organizations, philanthropic organizations, and community-based and faith-based organizations.

Each member will decide how best to engage the citizens within their jurisdiction. Each member must afford its citizens the opportunity to comment on the development of the Consolidated Plan/Annual Action Plan, AFH and on performance reports (CAPER) by way of a public comment period and a public hearing. Additional methods the public *may* be engaged:

Community meetings

Focus groups

Surveys

Public Housing Agency (PHA) plans

#### **a. Public Hearings**

Each member of the Consortium individually will typically conduct at least two public hearings a year to obtain citizens' views and respond to comments and questions. An additional public hearing will be held during the year AFH is being developed. The hearings will take place at different stages of the planning processes. At least one public hearing will be held to solicit comments on the development of the Consolidated Plan and/or Annual Action Plan and AFH, which includes the proposed uses of CDBG, HOME and ESG<sup>3</sup> funds or fair housing issues. Another public hearing will occur during the development of the CAPER, which will be held prior to the submission to HUD. Information about the time, location and subject of each hearing will be provided to citizens through the adopted public notice procedures.

As the lead entity for the Consortium, the Dakota County Board of Commissioners will hold a public hearing prior to the submission of the Consolidated Plan and/or Annual Action Plan to the U.S. Department of Housing and Urban Development (HUD). Governing boards of other consortium members may also hold public hearings for their residents.

Every effort will be made to ensure that public hearings are inclusive. Hearings will be held at convenient times to accommodate work and school schedules, preferably in the evening, and at locations where people most affected by proposed activities can attend. The Consortium will utilize public hearing facilities that are accessible to persons with mobility impairments, usually libraries, administration buildings, or city halls.

If notice is given at least seven (7) days before a hearing date, the Consortium will provide reasonable accommodations for limited English proficient persons and persons with visual and/or hearing impairments. Each Consortium member will follow their adopted LEP plans

#### **b. Public Notices and Publication of the Proposed Consolidated Plan**

A public notice will be published in one or more newspapers of general circulation at least ten (10) days prior to the public hearing but not more than two (2) weeks. When possible, the Consortium will utilize display ad notices in newspapers of general circulation. Due to the high cost of publishing in print media, a summary of the proposed Consolidated Plan and/or Annual Action Plan will be published. Consortium members will post either a full document or an executive summary on their website and any other websites deemed appropriate.

The information to be provided to the public on or before the public hearing will include:

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<sup>3</sup> Dakota County is the only recipient of ESG funds.

1. The amount of assistance the local government expects to receive (including grant funds and program income);
2. The range of activities that may be undertaken;
3. The estimated amount of funding that will benefit person of low-and moderate incomes; and
4. The anti-displacement and relocation plan

Either the full document or an executive summary of the Consolidated Plan, Annual Action Plans, CAPER and/or AFH will be made available at the main office of each Consortium member and at various locations throughout the Consortium member's jurisdiction. Locations would include public libraries, government centers, and city halls.

Citizens and groups may obtain a reasonable number of free copies of the proposed Consolidated Plan or AFH by contacting the main office of the Consortium member(s). A list of contact information can be found on page 7 of the CPP.

#### **c. Public Comments**

Citizens and other interested parties may present oral comments at the time of a hearing and/or submit written comments. A public comment period of not less than thirty (30) days will be afforded for the Consortium to receive comments from citizen on its proposed Consolidated Plan and/or Annual Action Plan, any substantial amendments to the plans and AFH.

The public comment period for the CAPER will be fifteen (15) days.

The Consortium will consider all comments or views of citizens received in writing or orally at public hearings and during the public comment period in preparing the final Consolidated Plan and/or Annual Action Plan or AFH. A summary of these comments or views, and a summary of any comments or views not accepted and any such reasons therefore not accepted, shall be included in the applicable Consolidated Plan and/or Annual Action Plan or CAPER of AFH.

Consortium members are required to respond to complaints. See section 7 of the CPP for further details on the process members will follow.

#### **d. Technical Assistance**

Groups or individuals interested in obtaining technical assistance to develop project proposals or apply for funding assistance through HUD formula grant programs covered by the Consolidated Plan may contact staff of the Consortium. The level and type of assistance provided is determined by the Consortium member. Receiving technical assistance does not guarantee award of funds.

### **4. Displacement and Relocation**

Each Consortium member prepares an anti-displacement and relocation plan. Consortium members attempt to avoid displacement whenever possible, while realizing that in some

situations it is unavoidable. In the event displacement occurs, Consortium members will follow their HUD approved Anti-displacement and Relocation Plans. These plans are available for review upon request.

## **5. Amendments to the Consolidated Plan or Annual Action Plans**

The CPP requires the Consortium to identify the criteria it will use for determining what constitutes a substantial amendment to the Consolidated Plan and/or Annual Action Plans. The Consortium shall amend its approved plan whenever it makes on one of the following decisions:

- An activity included in a consolidated plan or annual action plan is canceled;
- An activity not previously included in a consolidated plan or annual action plan is added;
- An activity's budget is increased or decreased by \$100,000.00 or more at one time;
- The location and/or national objective of an activity changes; or
- The allocation priorities within a Consortium member's jurisdiction change.

Notices announcing the requested substantial amendment and the start of a thirty (30) day public comment period will appear in one or more newspapers of general circulation. After the comment period, the requested change goes before the appropriate governing body for approval. Changes that occur that do not meet the above definition are considered administrative in nature and do not go through the substantial amendment process. These changes are made internally and appear in the CAPER at the end of the program year.

## **6. Access to Records**

The Consortium will provide citizen, public agencies, and other interested parties with reasonable and timely access to information and records relating to the Consolidated Plan and/or, Annual Action Plans, AFH and the use of funds under the CDBG, HOME and ESG<sup>4</sup> programs during the preceding five years.

A hard copy of the final adopted Consolidated Plan, Annual Action Plans, CAPER and AFH will be available for public inspection during normal business hours of the Consortium members' main office. Electronic versions of the aforementioned documents are available at all times on the Consortium members' websites. Residents without computers and/or internet access may gain access to the documents at any Public Library location throughout the Consortium's jurisdictions.

If requested, the public will be provided a reasonable number of free copies of each aforementioned document within a reasonable period of time. If requested, the document will be provided in alternative formats within a reasonable period of time and mailed copies to those who are homebound.

## **7. Response to Written Citizen Complaints**

The Consortium will, to the best of its ability and to the extent possible, provide within fifteen (15) working days a written response to any complaint related to the Consolidated Plan, Annual

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<sup>4</sup> Dakota County only receives ESG funding.



Action Plans, Substantial Amendments, CAPER, AFH or Citizen Participation Plan made in writing to the appropriate Consortium member. A list of contacts is available in section 10 of the CPP.

## 8. Amendments to the Citizen Participation Plan

The Consortium will provide citizens with a reasonable opportunity, no less than ten (10) days to comment on any substantial amendments to the Citizen Participation Plan.

## 9. Availability of the Citizen Participation Plan

Copies of the Citizen Participation Plan may be obtained by contacting the appropriate Consortium member. Upon request, Consortium members will make the plan available in an alternative format of anyone requested a special accommodation.

## 10. Contact and Resource Information

If a resident of:	Contact	Address & Phone Number	Web Site
Anoka County	Community Development Manager	2100 Third Ave – 7 <sup>th</sup> Floor Anoka County Gov't Center Anoka, MN 55303 763-323-5709	<a href="http://www.co.anoka.mn.us">www.co.anoka.mn.us</a>
Dakota County	Community & Economic Development Representative	1228 Town Centre Drive, Eagan, MN 55123 651-675-4400	<a href="http://www.dakotacda.org">www.dakotacda.org</a>
Ramsey County	Community & Economic Development Representative	250 Ramsey County Court House 15 W Kellogg Blvd St Paul, MN 55102 651-266-8000	<a href="http://www.co.ramsey.mn.us">www.co.ramsey.mn.us</a>
Washington County	Housing & Redevelopment Representative	Washington County HRA 7645 Currell Boulevard Woodbury, MN 55125 651-458-0936	<a href="http://www.wchra.com">www.wchra.com</a>
Coon Rapids	City Administrator	11155 Robinson Dr Coon Rapids, MN 55433 763-755-2880	<a href="http://www.ci.coon-rapids.mn.us">www.ci.coon-rapids.mn.us</a>
Woodbury	Housing & Redevelopment Coordinator	8301 Valley Creek Road Woodbury, MN 55125 651-414-3438	<a href="http://www.ci.woodbury.mn.us">www.ci.woodbury.mn.us</a>

The Dakota County Consortium Adopted a Citizen Participation Plan:  
5/1998

Since then it has been revised:

5/2000

6/2002

11/2004

5/2005

8/2009

6/2010

7/2012

5/2013

5/2015

5/2016

# Dakota County HOME Consortium HOME Program Resale/Recapture Policy

## Purpose

Federal regulation as required within 24 CFR 92 place certain restrictions on HOME-assisted units in order to ensure long-term affordability of the HOME units. If ownership of a HOME-assisted unit is transferred during the period of affordability these restrictions come into play. The HOME program allows for two different options: Resale and Recapture. These tools ensure that the HOME subsidy invested in the unit continues to be used for affordable housing during the period of affordability.

This Resale/Recapture Policy of the Dakota County HOME Consortium hereinafter referred to as “the Consortium” shall identify how and when each option shall be used to ensure long-term affordability of HOME-assisted units. This document describes two policies in detail:

1. Length of Affordability Periods of HOME-assisted units in the Consortium; and
2. The use of Resale versus Recapture.

## Policy

### **Section 1: Length of Affordability Period of HOME-Assisted Units in the Consortium**

Federal regulations impose minimum restrictions on long-term affordability but each Consortium member reserves the right to require stricter standards should they choose to do so. The HOME rule ties the length of a unit’s affordability period to the amount of HOME investment in the units. Specifically, 24 CFR 92.254(a)(4) mandates the following timelines for homeownership unit affordability periods and 24CFR 92.252(e) mandates the following timelines for rental unit affordability periods:

<b>HOME Assistance Per Ownership Unit</b>	<b>Minimum Affordability Period</b>
Less than \$15,000	5 Years
\$15,000 to \$40,000	10 Years
Greater than \$40,000	15 Years
<b>HOME Assistance Per Rental Unit</b>	
<b>Minimum Affordability Period</b>	
Rehab or Acquisition of Existing Unit	
Less than \$15,000	5 Years
\$15,000 to \$40,000	10 Years
Greater than \$40,000	15 Years
Rehab Involving Refinancing	15 Years
New Construction	20 Years
Acquisition of Newly Constructed Units	20 Years

Each HOME unit activity funded by the Consortium shall be governed by a written agreement that will include an explicit definition of the required affordability period for the project. It is the intention to use the federally required minimum affordability period as listed above unless otherwise directed by the Consortium to require a longer affordability period. The affordability period shall commence on the day that the project is entered into the federal Integrated Disbursement and Information System (IDIS) as a completed project.

## **Section 2: The Use of Resale Versus Recapture**

As mentioned above, 24 CFR 92.254(a)(5) identified the resale and recapture option as defined below as the only two acceptable methods for securing the long-term affordability of HOME-assisted units.

### **Key Resale/Recapture Term Definitions:**

1. **Direct Subsidy:** A direct subsidy consists of financial assistance that reduces the purchase price from fair market value to an affordable price or otherwise subsidizes the purchase, i.e. down payment, purchase price discount, or closing cost assistance.
2. **Development Subsidy:** A development subsidy is the difference between the cost to develop housing and the fair market price (appraised value). This type of subsidy to the developer is an indirect subsidy. For example, the Consortium may provide \$20,000 in grant funds to a developer to rehabilitate a home, the after rehab value is only \$15,000 because of neighborhood and market conditions. The \$5,000 difference is a development subsidy. While the subsidy does not go directly to the homebuyer, it helps make the development of the home feasible.
3. **Homebuyer investment:** The homebuyer's investment consists of the portion of initial down payment paid by the homebuyer combined with the value of any capital improvements made with the homebuyer's funds.
4. **Net Proceeds:** The net proceeds of a sale are an amount equal to the sales price minus non-HOME loan repayments and any closing costs. There are no circumstances wherein the Consortium will recapture more than is available from the net proceeds of the sale.
5. **Period of Affordability:** HOME regulations require that assisted properties remain affordable for a specific period of time depending on the level of HOME funds invested. As described above, the Consortium identifies its own affordability periods that are equal to or longer than the HUD-required minimum period.
6. **Noncompliance:** Failure to comply with the resale or recapture requirements means that:
  - a. The original HOME-assisted homebuyer no longer occupies the unit as his/her principal residence (i.e., unit is rented or vacant), or
  - b. The home was sold during the period of affordability and the applicable resale or recapture provisions were not enforced.

**Resale.** Under the resale option, if the current homeowner decides to sell his/her home during the period of affordability the new homeowner must be income-qualified under the HOME program and must occupy the home as his/her principal residence. The original HOME-assisted owner must receive a fair return on investment, which is based on the initial investment plus

improvements, as identified below. Additionally, the sale price must be affordable to a range of subsequent low-income owner-occupied households.

As required by 24 CFR 92.254(a)(5), the Consortium must ensure that the price at resale provides the original HOME-assisted owner a fair return on investment. The Consortium shall meet this requirement by using the percentage change in the Consumer Price Index (CPI) as its standard index for Fair Return on investment over the period of ownership. The Consortium will multiply this percentage change by the combined amount of down payment funds provided by the initial owner at the time of purchase and the cost of capital improvements made by the initial owner during the ownership period. This multiplied amount, plus the original value of the down payment funds and capital improvement made, will constitute the fair return to the original homebuyer in the event there are net proceeds available from the resale.

Capital improvements will include improvements made to the property that adds basis to the home as defined within IRS Publication 523. The initial homeowner must keep written documentation regarding the costs of capital improvements, including receipts or copies of contracts and payments made to contractors, in order to receive credit for the value of the capital improvements at resale. The initial homeowner must also keep written documentation confirming the necessary permitting and inspection processes were followed, when applicable.

A fair return on investment to the initial homebuyer may be less than the full value calculated above or no return if there are no or insufficient net proceeds from the resale. This can occur when market conditions are such that the median sales price has stagnated or decreased during the ownership period or when the initial homebuyer has paid more for capital improvements than can be supported by the market at the time of resale.

To provide continued affordability of the property, the Consortium will ensure that home is affordable to a range of homebuyers at the time of resale. The targeted population of such buyers will include households with incomes between 50% and 80% Area Median Income (AMI) who pays no more than 30% of gross income for principal, interest, property taxes, homeowner association dues, and insurance. If providing funds as a development subsidy, the targeted income range of subsequent buyers may be of lower incomes as defined in a written agreement between the Consortium member and the recipient of the development subsidy. If the market price that provides a fair return to the initial homebuyer is too high to be affordable for the subsequent buyer within the targeted range to purchase the property, the Consortium, at its sole discretion, may provide HOME assistance as a direct subsidy to the subsequent buyer.

*It is important to note that in certain circumstances, such as a declining housing market where home values are depreciating, the original homebuyer may not receive a return on his/her investment because the home sold for less or the same price as the original purchase price.*

**Recapture**. The recapture option requires that a HOME-assisted homeowner must occupy that home as his/her principal residence throughout the period of affordability. In the event that the owner ceases to occupy the home as his/her principal residence during the period of

affordability this shall be deemed to constitute a violation of the written agreement governing the use of funds and all HOME funds shall be required to be repaid. The recapture option also requires that all or a portion of the direct HOME subsidy be reimbursed to the Consortium if the homeowner decides to transfer the property within the period of affordability.

The maximum amount of the HOME subsidy that may be recaptured is capped at the amount of available net proceeds. The net proceeds of a sale are an amount equal to the sales price minus non-HOME loan repayments and any closing costs. The homeowner may transfer the house at whatever price the market will bear and to any person regardless of income. Recaptured funds must be used for HOME-eligible activities. The recapture option is only available to HOME funds that were a direct subsidy to the homeowner. The direct subsidy may be provided in conjunction with a development subsidy; however, the affordability period is based on the direct subsidy. The recapture option cannot be used on HOME funds that are solely considered development subsidies.

If HOME funds are a loan to a homebuyer, the homebuyer shall be allowed to retain all appreciation; however, the mortgage and note that secure the HOME funds shall determine the structure in which principal and interest are repaid during the term of the loan.

### **Section 3: Consortium Uses**

Determination of when Resale or Recapture will be used:

- When HOME funds are awarded as an indirect subsidy to a developer for a homebuyer activity, the resale option will be used.
- When HOME funds are used to provide a direct subsidy to homebuyer(s), the recapture option will be used.

### **Section 4: Enforcement Documentation**

The affordability period of any HOME-assisted units shall be governed by a legal instrument recorded at the appropriate County Recorder's office. This same instrument shall also identify and enforce the resale or recapture provisions of the HOME program. Such documentation shall be provided by the Consortium member and may include one or more of the following depending on the type of project:

1. Resale:
  - a. Deed Restriction; or
  - b. Declaration of Covenant.
2. Recapture:
  - a. Anoka County – Recorded Repayment Agreement and Note;
  - b. Dakota County - Mortgage and Note;
  - c. Ramsey County - Grant of Lien, Note and Declaration;
  - d. Washington County - Mortgage, Note and Declaration;
  - e. City of Woodbury – Mortgage and Note.

The precise nature of the documentation will be identified in the written agreement that governs the usage of the HOME funds in the project. Please contact the appropriate

Consortium member to ensure the correct document for enforcement of the HOME resale/recapture provision is used and recorded.

**HOME Written Agreement.** The HOME written agreement must be a separate legal document from any loan instrument and must, at a minimum, comply with the requirements at 24 CFR 92.504(c)(5) of the HOME rule. If the Consortium member provides HOME funds to a subrecipient or CHDO to develop and sell affordable housing, the Consortium member must prepare and execute the agreement with the buyer, or be a party to the agreement along with the entity it funded to ensure it can enforce the written agreement.

The executed HOME written agreement with the homebuyer must be recorded at the appropriate County Recorder's office when resale or recapture is used.

### **Section 5: Ongoing Monitoring**

For HOME-assisted homebuyer projects under resale or recapture agreements, the Consortium will perform ongoing monitoring of the principal residency requirement during the period of affordability to confirm that the buyer is using the property as his/her principal residence. This can be accomplished through a variety of means, including, but not limited to verification of the buyer's name on utility company records, insurance company records for the home, property records verification, and or postcard or letters mailed with "do not forward" instructions can demonstrate whether the buyer is receiving mail at the home.



# WRITTEN STANDARDS & ADMINISTRATIVE PLAN

FOR THE

## EMERGENCY SOLUTIONS GRANT (ESG) DAKOTA COUNTY



Prepared by Dakota County CDA  
Community & Economic Development Department



Adopted: May 3, 2016



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# CHAPTER I

## INTRODUCTION AND OVERVIEW

Dakota County has adopted the following administrative standards for the operation and prioritization of Emergency Solutions Grant (ESG) funding in accordance with Federal Regulations 24 CFR 91.2209(l)(4)(i); 567.400(e)(1) and (e)(3). These standards serve as the administrative guidelines and procedures to be used by Dakota County in implementing programs funded with ESG dollars to ensure consistent treatment of applicants/participants and compliance with funding requirements.

Dakota County is awarded ESG funds from the Department of Housing and Urban Development (HUD) on an annual basis as part of the Consolidated Plan and Annual Action Plans. These plans prescribe the statutory planning and application requirements for the following entitlement programs: Community Development Block Grant (CDBG); HOME Investment Partnership (HOME); Housing Opportunities for Persons with AIDS (HOPWA) and Emergency Solutions {formally Shelter} Grant (ESG).

Authorized by subtitle B of title IV of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11371-11378), ESG funds are designed to provide sheltered and unsheltered homeless persons and those at risk of homelessness with services necessary to help them quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness.

ESG funds can be used for the rehabilitation or conversion of buildings for use as emergency shelter for the homeless, for the payment of certain expenses related to operating emergency shelters, for essential services related to emergency shelters and street outreach for the homeless, and for homelessness prevention and rapid re-housing assistance.

The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act) amended the McKinney-Vento Homeless Assistance Act placing stronger emphasis on homelessness prevention and rapid re-housing assistance. Dakota County has followed suit and has directed a majority of its ESG allocation towards homelessness prevention and rapid re-housing activities.

## SECTION I.....DEFINITIONS AND ABBREVIATIONS.....

The Emergency Solutions Grant is a federal formula grant authorized under the Department of Housing and Urban Development (HUD). A *federal formula grant* is awarded to a jurisdiction based upon a formula that takes into account factors such as the number of households in poverty, age of housing stock, population and economic growth, and in the case of HOPWA, the number of reported cases of people with AIDS in the metropolitan area. The U.S. Congress

appropriates federal grants annually so each grant amount may vary from year to year.

Dakota County, considered an Urban County as defined by HUD, is a direct grantee of CDBG, HOME and ESG formula grant. *Grantee* means the person or legal entity to which a grant is awarded and that is accountable for the use of the funds provided.

Each grant fund is subject to specific regulatory requirements and has specific applications for which the funds can be spent.

- *The Community Development Block Grant (CDBG)* is a flexible program that is granted to larger cities and urban counties to develop viable communities by providing decent housing, a suitable living environment, and opportunities to expand economic opportunities
- *The HOME Investment Partnership (HOME)* provides formula grants to States and localities that communities use-often in partnership with local nonprofit groups-to fund a wide range of activities that build, buy, and/or rehabilitate affordable housing for rent or homeownership or provide direct rental assistance to low-income people.
- *The Emergency Solutions {formally Shelter} Grant (ESG)* recipients are state governments, large cities, and urban counties who provide assistance to individuals and families to quickly regain stability in permanent housing after experiencing a housing crisis or homelessness.
- *Housing Opportunities for Persons with AIDS (HOPWA)* is provided to the eligible metropolitan statistical area (EMSA) and can be used for a variety of housing and services for people living with HIV and their families.

As a recipient of these formula grant funds, Dakota County is required to produce the following documents:

- *The Consolidated Plan* is a five-year planning document intended to establish a unified vision for community development, outline coordinated strategies to address community needs related to housing and economic development, identify proposed programs and establish goals and project accomplishments over the five-year period.
- *Annual Action Plan* is the annual planning document that describes how the specific federal formula funds are going to be spent over the course of the upcoming program year and the projects that will be undertaken to accomplish the strategies and goals that were set forth in the five-year Consolidated Plan.
- *Consolidated Annual Performance and Evaluation Report (CAPER)* is the annual report that evaluates the uses of the formal grants, outlines the yearly expenditures, and assesses the jurisdictions' progress at implementing their Annual Action Plan as well as reaching the goals set in the five-year Consolidated Plan.

- *Substantial Amendment* is an amendment to any the aforementioned documents by which a “substantial change” in priority need/objective or planned activity is to occur. A “substantial change” is defined further in the Citizen Participation Plan.

Emergency Solution Grant funds can be used to provide a range of services and support under five *program components*: Street Outreach, Emergency Shelter, Rapid Re-Housing, Homelessness Prevention, and HMIS.

- *Street Outreach* activities are designed to meet the immediate needs of unsheltered homeless persons by connecting them with emergency shelter, housing, and/or critical health services.
- *Emergency Shelter* activities are designed to increase the quantity and quality of temporary shelters for homeless persons, through the renovation of existing shelters or conversion of buildings into shelters, paying for the operating cost of shelters, and providing essential services.
- *Rapid Re-Housing* activities are designed to move homeless persons quickly to permanent housing through housing relocation and stabilization services and short- and/or medium-term rental assistance.
- *Homelessness Prevention* activities are designed to prevent an individual or family from moving into an emergency shelter or living in a public or private place not meant for human habitation through housing relocation and stabilization services and short- and/or medium-term rental assistance.
- *HMIS* (Homeless Management Information System) activities are designed to fund ESG recipients’ and subrecipients’ participation in the HMIS collection and analyses of data on individuals and families who are homeless and at-risk of homelessness.

*Homeless* is categorized as:

Literally Homeless	<p>1) An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:</p> <p style="padding-left: 40px;">(i) An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;</p> <p style="padding-left: 40px;">(ii) An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); or</p>
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	<p>(iii) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;</p>
Imminent Risk of Homelessness	<p>(2) An individual or family who will imminently lose their primary nighttime residence provided that:</p> <ul style="list-style-type: none"> <li>(i) The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;</li> <li>(ii) No subsequent residence has been identified; and</li> <li>(iii) The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, needed to obtain other permanent housing;</li> </ul>
Homeless under other Federal statutes	<p>(3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:</p> <ul style="list-style-type: none"> <li>(i) Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)) or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);</li> <li>(ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;</li> <li>(iii) Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and</li> <li>(iv) Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment; or</li> </ul>
Fleeing/Attempting to flee Domestic Violence	<p>(4) Any individual or family who:</p> <ul style="list-style-type: none"> <li>(i) Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family</li> </ul>

	<p>member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;</p> <p>(ii) Has no other residence; and</p> <p>(iii) Lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, to obtain other permanent housing.</p>
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*Annual (gross) Income* means the gross amount, monetary or not which go to or on behalf of the individual or family household that is anticipated to be received during the coming 12-month period. Annual income also includes amounts derived from assets.

*Household* means the family and approved live-in aide.

*Dependent.* A member of the family (except foster children and foster adults) other than the family head or spouse, who is under 18 years of age, or is a person with a disability, or is a full-time student.

*Guest* means a person temporarily staying in the unit with the consent of a tenant or other member of the household who has express or implied authority to so consent on behalf of the tenant.

*Covered person* means a tenant, any member of the tenant's household, a guest or another person under the tenant's control.

*Other person under the tenant's control*, for the purposes of the definition of *covered person* means that the person, although not staying as a guest (as defined in this section) in the unit, is, or was at the time of the activity in question, on the premises (as *premises* is defined in this section) because of an invitation from the tenant or other member of the household who has express or implied authority to so consent on behalf of the tenant. Absent evidence to the contrary, a person temporarily and infrequently on the premises solely for legitimate commercial purposes is not *under the tenant's control*.

*Premises* means the building or complex or development in which the public or assisted housing dwelling unit is located, including common areas and grounds. *Fair Market Rents (FMRs)* are gross rent estimates for an area and serve as the rent ceiling for rental assistance funded with ESG. Dakota County is part of the Minneapolis-St. Paul-Bloomington MSA statistical area. The FMRs are re-calculated each year by HUD using American Community Survey (ACS) data as well as regional or local data. They include the shelter rent plus the cost of all tenant-paid utilities, except telephones, cable or satellite television service, and internet service.

*MSA* means a metropolitan statistical area.

*Utility allowance.* If the cost of utilities (except telephone) and other housing services for an assisted unit is not included in the tenant rent but is the responsibility of the family occupying the unit, an amount equal to the estimate made or approved by a PHA or HUD of the monthly



cost of a reasonable consumption of such utilities and other services for the unit by an energy-conservative household of modest circumstances consistent with the requirements of a safe, sanitary, and healthful living environment.

*Public Housing Agency (PHA)* means any State, county, municipality, or other governmental entity or public body, or agency or instrumentality of these entities that is authorized to engage or assist in the development or operation of low-income housing under the 1937 Act.

*Rent Reasonableness* is the process to determine if the rent being requested for the unit or room is reasonable to rates being charged for non-assisted market rate units. If a rent is determined to be higher than the market, it may be the unit is charging more given the status of the tenant's participation in an assistance program.

*Unit Inspection* is the processing to determine if the unit or room selected by the household meets the minimum housing standards established for the ESG program.

*Housing Subsidy Contract* is the contract agreement between Dakota County and the owner/property management of a rental unit which sets forth the terms under which the rental assistance is provided.

*Emergency Shelter* means any facility where the primary purpose is to provide a temporary shelter for the homeless in general or for specific populations of the homeless and which does not require occupants to sign leases or occupancy agreements.

*1937 Act* means the United States Housing Act of 1937 (42 U.S.C. 1437 *et seq.*)

*ADA* means the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 *et seq.*).

*Department* means the Department of Housing and Urban Development.

*HUD* means the same as *Department*.

*Drug* means a controlled substance as defined in section 102 of the Controlled Substances Act (21 U.S.C. 802).

*Drug-related criminal activity* means the illegal manufacture, sale, distribution, or use of a drug, or the possession of a drug with intent to manufacture, sell, distribute or use the drug.

*Violent criminal activity* means any criminal activity that has as one of its elements the use, attempted use, or threatened use of physical force substantial enough to cause, or be reasonably likely to cause, serious bodily injury or property damage.

*Fair Housing Act* means title VIII of the Civil Rights Act of 1968, as amended by the Fair Housing Amendments Act of 1988 (42 U.S.C. 3601 *et seq.*).

*Federally assisted housing* means housing assisted under any of the following programs:

- (1) Public housing;
- (2) Housing receiving project-based or tenant-based assistance under Section 8 of the U.S. Housing Act of 1937 (42 U.S.C. 1437f);
- (3) Housing that is assisted under section 202 of the Housing Act of 1959, as amended by section 801 of the National Affordable Housing Act (12 U.S.C. 1701q);
- (4) Housing that is assisted under section 202 of the Housing Act of 1959, as such section existed before the enactment of the National Affordable Housing Act;
- (5) Housing that is assisted under section 811 of the National Affordable Housing Act (42 U.S.C. 8013);
- (6) Housing financed by a loan or mortgage insured under section 221(d)(3) of the National Housing Act (12 U.S.C. 1715/(d)(3)) that bears interest at a rate determined under the proviso of section 221(d)(5) of such Act (12 U.S.C. 1715/(d)(5));
- (7) Housing insured, assisted, or held by HUD or by a State or local agency under section 236 of the National Housing Act (12 U.S.C. 1715z-1); or
- (8) Housing assisted by the Rural Development Administration under section 514 or section 515 of the Housing Act of 1949 (42 U.S.C. 1483, 1484).

*Public housing* means housing assisted under the 1937 Act, other than under Section 8. “Public housing” includes dwelling units in a mixed finance project that are assisted by a PHA with capital or operating assistance.

*Continuum of Care (CoC)* means a regional or local planning body that coordinates housing and services funding for homeless families and individuals. Dakota County is part of the Suburban Metro Area Continuum of Care (SMAC) which is composed of five counties that surround the Minneapolis/St. Paul area. They included: Anoka, Carver, Dakota, Scott, and Washington Counties.

**SECTION II.....COORDINATION AMONG PROVIDERS.....**

Dakota County will continue to participate in local CoC activities and use coordinated assessment to coordinate with providers in and around Dakota County.

Input from CoC member has been integrated throughout these written standards.

## CHAPTER II

### STREET OUTREACH §576.101

Under this component, ESG funds may be used for costs of providing essential services necessary to reach out to unsheltered homeless people; connect them with emergency shelter, housing or critical services; and provide non facility-based care.

Eligible service costs under ESG include:

- Engagement
- Case Management
- Emergency Health Services
- Transportation
- Services for Special Population
- Emergency Mental Health Services

#### SECTION I.....EVALUATION OF ELIGIBILITY.....

The following eligibility criteria must be met in order for an individual or family to be provided services with ESG assistance under Street Outreach:

##### 1. Definition of Homeless

For the purposes of program eligibility, a household must meet the definition of literally homeless or attempting to flee domestic violence where the individual or family also meets the criteria for literally homeless as defined in Chapter I, Section I of this plan or as spelled out in 24 CFR 576.2.

##### 2. Additional limitation

Individuals and families must be living on the streets or other places not meant for human habitation and be unwilling or unable to access services in emergency shelter.

#### SECTION II...STANDARDS FOR TARGETING AND PROVIDING ESSENTIAL SERVICES....

A referral network exists in Dakota County among service providers and other designated agencies within the county which provide outreach services. Further consideration is needed before developing any standards for using ESG towards street outreach.

## CHAPTER III

### EMERGENCY SHELTER §576.102

Under this component, ESG funds may be used for costs of providing essential services to homeless families and individuals in emergency shelters, renovating buildings to be used as emergency shelters, and operating emergency shelters.

Eligible service costs under ESG include:

- Case Management
- Education Services
- Employment Assistance and Job Training
- Life Skills Training
- Legal Services

Eligible Shelter Operations under ESG include:

- Maintenance
- Rent
- Equipment
- Utilities
- Food
- Hotel/Motel Vouchers

#### SECTION I.....EVALUATION OF ELIGIBILITY.....

The following eligibility criteria must be met in order for an individual or family to be provided services with ESG assistance under Emergency Shelter:

##### 1. Definition of Homeless

For the purposes of program eligibility, a household must meet the definition of homeless in any of the 4 categories defined in Chapter I, Section I of this plan or as spelled out in 24 CFR 576.2.

#### SECTION II.....ADMISSION, DIVERSION, REFERRAL AND DISCHARGE .....

Dakota County will develop this section when a shelter model is solidified.

#### SECTION III.....ASSESSMENT, PRIORITIZATION AND REASSESSMENT OF NEED .....

Dakota County will develop this section when a shelter model is solidified.

## CHAPTER IV

### HOMELESS PREVENTION §576.103 AND RAPID RE-HOUSING ASSISTANCE §576.104

Under these two components, ESG funds may be used to provide housing relocation and stabilization services and short- and/or medium-term rental assistance necessary to either prevent a household from moving into an emergency shelter or help a homeless individual or family move into permanent housing and in all cases achieve stability in that housing.

Eligible financial costs under ESG include:

- Short-to-Medium term rental assistance
- Rental Arrears
- Rental Application Fees
- Security Deposits/Last Month's Rent
- Moving Costs

Eligible service costs under ESG include:

- Housing Search and Placement
- Housing Stability Case Management
- Mediation
- Legal Services
- Credit Repair

Dakota County has chosen to fund these components with ESG funding.

#### SECTION I.....PRIORITIZATION ELIGIBILITY.....

The resources available to address the needs of homeless and at-risk of homeless are limited. Dakota County will work with the local CoC and participate in coordinated assessment to determine and prioritize which individuals and families are eligible to receive assistance.

#### SECTION II.....EVALUATION OF ELIGIBILITY.....

The following eligibility criteria must be met in order for an individual or family to be provided services with ESG assistance under Homeless Prevention:

##### 1. Definition of Homeless

For the purposes of program eligibility, a household must meet the definition of an imminent risk of homeless, homeless under other Federal Statutes or attempting to flee domestic violence as defined in Chapter I, Section I of this plan or as spelled out in 24 CFR 576.2

##### 2. Tie to Dakota County

The individual or family must have a local tie to Dakota County. They may currently reside in Dakota County, work in Dakota County or go to school in Dakota County.

### 3. Annual Income

The household must have an annual income at or below 30 percent of area median income.

The following eligibility criteria must be met in order for an individual or family to be provided services with ESG assistance under Rapid Re-housing:

#### 1. Definition of Homeless

For the purposes of program eligibility, a household must meet the definition of literally homeless or attempting to flee domestic violence where the individual or family also meets the criteria for literally homeless as defined in Chapter I, Section I of this plan or as spelled out in 24 CFR 576.2. If a household loses their homeless status during the housing search process, they will no longer be eligible for ESG Rapid Re-Housing assistance.

#### 2. Tie to Dakota County

The individual or family must have a local tie to Dakota County. They may presently reside in a shelter or be precariously housed in Dakota County, prior to crisis have resided in Dakota County, work in Dakota County or go to school in Dakota County.

#### A. PROCEDURE TO DETERMINE ELIGIBILITY

Before providing assistance to a household with ESG funds, Dakota County will complete an initial intake evaluation which will include:

*Verification of Homeless status eligibility*

*Verification of tie to Dakota County*

*Verification of Household Income*

*Assessment of Need*

The individual or family household must provide all requested verification documents and sign any release related to verifying the households' eligibility, including all items necessary for reporting HMIS.

##### **1) Verification of Homeless status eligibility**

Documentation will need to be supplied or collected based upon the following hierarchy and order of priority.

1<sup>st</sup> – Third party documentation

2<sup>nd</sup> – Observation by the intake worker

3<sup>rd</sup> – Self-declaration from the individual or family seeking assistance

Acceptable evidence of third party documentation includes:

- Records contained in an HMIS database; or
- Comparable database used by victim service or legal service providers;
- Written observations by an outreach worker of the conditions where the individual or family was living;
- A referral from a publicly or privately operated shelter;
- Discharge paperwork or written/oral referral from a social worker, case manager, or other appropriate official of an institution stating the beginning and end dates of the time residing in the institution.
  - All oral statements must be recorded by the intake worker

For those that are at risk of homelessness, third party would include:

- A court order resulting from an eviction action or an equivalent notice to terminate under date law that requires the individual or family to leave their residence within 14 days after the date of their request for assistance;
- Written or oral statement by the owner or renter of the housing stating that the individual or family will not be allowed to stay for more than 14 days after the date of their request for assistance;
  - All oral statements must be recorded by the intake worker

Observation by the intake worker:

- If the intake worker can access HMIS or a comparable database (which retains an auditable history of all entries including the person who entered the data, the date of entry, and any changes made) to establish their homeless status.

Self-declaration from the individual household or family will include:

- completion of the self-declaration form **and**
- Written record on the intake worker's attempts to obtain third-party verification.

## 2) Verification of tie to Dakota County

Verification of a household's tie to Dakota County will most likely be documented through their verification of homeless status and/or verification of income.

The household must provide evidence of their tie to Dakota County, whether they currently reside in Dakota County in the case of homeless prevention, or currently reside in a shelter or are precariously housed in Dakota County in the case of rapid re-housing.

The household may currently work in Dakota County and are able to provide proof of their employment.

The household (including their children) may currently attend a school institution in Dakota County and are able to provide proof of their enrollment.

### 3) Verification of Household Annual Income

At initial intake, verification of household income must be collected to determine eligibility in the case of homeless prevention assistance. Verification of income will also serve as the basis for determining the household's contribution towards rental assistance should their determined assessment of need be on-going rental assistance.

For the purpose of determining eligibility, a household's future income must be projected over the next 12 months based upon the household's current circumstances. Dakota County will assume the household's current circumstances will continue for the next 12 month unless there is verifiable evidence it will be different.

Household income includes all sources of income (for all members in the household) and it also includes assets (for all members in the household). See Section III for further details related to annual income.

Documentation will need to be supplied or collected based upon the following hierarchy and order of priority.

1<sup>st</sup> – Source documents

2<sup>nd</sup> – Third party verification

3<sup>rd</sup> – Self-certification from the household

Source documents include (but are not limited to):

- Pay stubs or wage statements
- Bank statements
- Social Security award notice
- Child support payment record
- General Assistance or TANF letter

Third party verification would be collected directly from the employer, social security administration, public assistance agency or financial institution. To conduct third party verifications, the household must sign a release form that authorizes the third party to release the required information.

Self-declaration from the individual household or family should only be used if source documents cannot be supplied and attempts to collect third party verification are unsuccessful. Acceptable self-declaration may include:

- Completion of a self-declaration form or a signed written statement from the head of household **and** household member if the income/asset pertains directly to that member. If the member is under age 18, they will not be required to sign.
- Written record on the intake worker's attempts to obtain third-party verification.

For additional income verification procedure and process, please refer to section III of this chapter.



#### 4) Assessment of Need

An initial evaluation of need must be conducted prior to providing assistance to determine the amount and types of assistance the individual or family needs to gain or regain stability in permanent housing. The intake worker must document their assessment and detail their decision for determining need.

Certification or other written documentation that the household lacks the resources and support networks to obtain permanent housing must also be included as part of the assessment.

Re-evaluation for homelessness prevention and rapid re-housing assistance. 24 CFR § 576.401(b): (1) a program participant’s eligibility including the types and amounts of assistance under the homeless prevention component must be re-evaluated once every three months; and 2) a program participant’s eligibility including the types and amounts of assistance under the rapid-rehousing assistance component must be re-evaluated not less than once annually.

1. For the purposes of the Dakota County ESG program, households’ needs and income will be re-evaluated every six (6) months.

#### B. DENIAL OF ASSISTANCE

Any applicant determined ineligible through the initial assessment or subsequent process will be notified in writing. An applicant will be given the opportunity to request an informal review in accordance with the procedures in section VI of this chapter.

Dakota County may deny applicant assistance if:

- The applicant does not meet the current definition of homelessness as defined by HUD either for homeless prevention or rapid re-housing.
- The applicant is unable to sufficiently document their homeless status.
- The applicant does not have a tie to Dakota County.
- For homeless prevention, the household income is over 30% area median income.
- An alternative program better suits their current needs.
- The applicant is unable to locate suitable housing after searching for 12 months.

Ineligibility does not bar the individual or family household from being referred at a later date.

#### SECTION III.....VERIFICATION OF ANNUAL INCOME.....

Annual income is used to determine program eligibility and the level of assistance the household will receive.

To determine the annual income of an individual or family household, ESG regulation requires the use of calculating income standards under 24 CFR 5.609. The annual income definition found at

24 CFR Part 5 is used by a variety of federal programs including Housing Choice Voucher (Section 8), Public Housing, and the Low-Income Housing Tax Credit Program.

**A. DEFINITION OF ANNUAL INCOME**

The Part 5 definition of *annual (gross) income* is the gross amount, monetary or not, which go to or on behalf of the individual or family household that is anticipated to be received during the coming 12-month period. Annual income also includes amounts derived from assets.

*Gross Amount* is before any deductions have been taken.

*Anticipated to be received* is a projection forward of future earnings or benefits over 12 months to determine a household’s expected ability to pay.

**B. TYPES OF INCOME TO COUNT**

There are some “inclusions” on types of income to be counted and “exclusions” on types of income that are not considered.

**1) Part 5 Inclusions**

This table presents the Part 5 income inclusions to be counted to determine annual income:

General Category	
1. Income from wages, salaries, tips, etc.	The full amount, before any payroll deductions, of wages and salaries, overtime pay, commissions, fees, tips and bonuses, and other compensation for personal services.
2. Business Income	The net income from the operation of a business or profession. Expenditures for business expansion or amortization of capital indebtedness shall not be used as deductions in determining net income. 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. Any withdrawal of cash or assets from the operation of a business or profession will be included in income, except to the extent the withdrawal is reimbursement of cash or assets invested in the operation by the family.
3. Interest & Dividend Income	Interest, dividends, and other net income of any kind from real or personal property. Expenditures for amortization of capital indebtedness shall not be used as deductions in determining net income. An allowance for depreciation is permitted only as authorized in number 2 (above). Any withdrawal of cash or assets from an investment will be included in income, except to the extent the withdrawal is reimbursement of cash or assets invested by the family. 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 HUD.
4. Retirement & Insurance Income	The full amount of periodic amounts received from Social Security, annuities, insurance policies, retirement funds, pensions, disability or death benefits, and other similar types of periodic receipts, including a lump-sum amount or prospective monthly amounts for the delayed start of a periodic payment (except for certain exclusions, listed in Income Exclusions, number 14).
5. Unemployment & Disability Income	Payments in lieu of earnings, such as unemployment and disability compensation, worker's compensation and severance pay (except for certain exclusions, listed in Income Exclusions, number 3).

6. Welfare Assistance	<p>Welfare Assistance. Welfare assistance payments made under the Temporary Assistance for Needy Families (TANF) or in Minnesota (MFIP, GA, &amp; MSA) program are included in annual income:</p> <ul style="list-style-type: none"> <li>• Qualify as assistance under the TANF program definition at 45 CFR 260.31; and</li> <li>• Are otherwise excluded from the calculation of annual income per 24 CFR 5.609(c).</li> </ul> <p>If the welfare assistance payment includes an amount specifically designated for shelter and utilities that is subject to adjustment by the welfare assistance agency in accordance with the actual cost of shelter and utilities, the amount of welfare assistance income to be included as income shall consist of:</p> <ul style="list-style-type: none"> <li>• the amount of the allowance or grant exclusive of the amount specifically designated for shelter or utilities; <b>plus:</b></li> <li>• the maximum amount that the welfare assistance agency could in fact allow the family for shelter and utilities. If the family welfare assistance is reduced from the standard of need by applying a percentage, the amount calculated under 24 CFR 5.609 shall be the amount resulting from one application of the percentage.</li> </ul>
7. Alimony, Child Support, & Gift Income	Periodic and determinable allowances, such as alimony and child support payments, and regular contributions or gifts received from organizations or from persons not residing in the dwelling.
8. Armed Forces Income	All regular pay, special pay, and allowances of a member of the Armed Forces (except as provided in number 8 of Income Exclusions).

## 2) Part 5 Exclusions

This table presents the Part 5 income exclusions not to be counted to determine annual income:

General Category	
1. Income of Children	Income from employment of children (including foster children) under the age of 18 years.
2. Foster Care Payments	Payments received for the care of foster children or foster adults (usually persons with disabilities, unrelated to the tenant family, who are unable to live alone).
3. Inheritance and Insurance Income	Lump-sum additions to family assets, such as inheritances, insurance payments (including payments under health and accident insurance and worker's compensation), capital gains, and settlement for personal or property losses (except for certain exclusions, listed in Income Inclusions, number 5).
4. Medical Expense Reimbursements	Amounts received by the family that are specifically for, or in reimbursement of, the cost of medical expenses for any family member.
5. Income of Live-in Aides	Income of a live-in aide (as defined in 24 CFR 5.403).
6. Income from a Disabled Member	Certain increase in income of a disabled member of qualified families residing in HOME-assisted housing or receiving HOME tenant-based rental assistance (24 CFR 5.671 (a)).
7. Student Financial Aid	The full amount of student financial assistance paid directly to the student or to the educational institution.
8. "Hostile Fire" Pay	The special pay to a family member serving in the Armed Forces who is exposed to hostile fire.
9. Self-Sufficiency Program Income	<ul style="list-style-type: none"> <li>a. Amounts received under training programs funded by HUD.</li> <li>b. Amounts received by a person with a disability that are disregarded for a limited time for purposes of Supplemental Security Income eligibility and benefits because they are set aside for use under a Plan to Attain Self-Sufficiency (PASS).</li> <li>c. Amounts received by a participant in other publicly assisted programs that are specifically for, or in reimbursement of, out-of-pocket expenses incurred (special equipment, clothing, transportation, childcare, etc.) and which are made solely to allow participation in a specific program.</li> <li>d. Amounts received under a resident service stipend. A resident service stipend is a modest amount (not to exceed \$200 per month) received by a resident for performing a service for the PHA or owner, on a part-time basis, that enhances the quality of life in the development. Such services may include, but are not limited to, fire patrol, hall monitoring, lawn maintenance, resident initiatives coordination, and serving as member of the PHA's governing board. No resident may receive more than one such stipend during the same period of time.</li> <li>e. Incremental earnings and benefits resulting to any family member from participation in qualifying state or local employment training programs (including training not affiliated with a local government) and training of a family member as resident management staff. Amounts excluded by this provision must be received under employment training programs with clearly defined goals and objectives, and are excluded only for the period during which the family member participates in the employment-training program.</li> </ul>
10. Gifts	Temporary, nonrecurring, or sporadic income (including gifts).
11. Reparation Payments	Reparation payments paid by a foreign government pursuant to claims filed under the laws of that government by persons who were persecuted during the Nazi era.
12. Income from	Earnings in excess of \$480 for each full-time student 18 years old or older (excluding the head of household or spouse).

Full-time Students	
13. Adoption Assistance Payments	Adoption assistance payments in excess of \$480 per adopted child.
14. Social Security & SSI Income	Deferred periodic amounts from supplemental security income and social security benefits that are received in a lump sum amount or in prospective monthly amounts.
15. Property Tax Refunds	Amounts received by the family in the form of refunds or rebates under state or local law for property taxes paid on the dwelling unit.
16. Home Care Assistance	Amounts paid by a state agency to a family with a member who has a developmental disability and is living at home to offset the cost of services and equipment needed to keep this developmentally disabled family member at home.
17. Other Federal Exclusions	<p>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 any program to which the exclusions set forth in 24 CFR 5.609(c) apply. A notice will be published in the Federal Register and distributed to housing owners identifying the benefits that qualify for this exclusion. Updates will be published and distributed when necessary. The following is a list of income sources that qualify for that exclusion:</p> <ul style="list-style-type: none"> <li>▶ The value of the allotment provided to an eligible household under the Food Stamp Act of 1977;</li> <li>▶ Payments to volunteers under the Domestic Volunteer Service Act of 1973 (employment through AmeriCorps, VISTA, Retired Senior Volunteer Program, Foster Grandparents Program, youthful offender incarceration alternatives, senior companions);</li> <li>▶ Payments received under the Alaskan Native Claims Settlement Act;</li> <li>▶ Income derived from the disposition of funds to the Grand River Band of Ottawa Indians;</li> <li>▶ Income derived from certain submarginal land of the United States that is held in trust for certain Indian tribes;</li> <li>▶ Payments or allowances made under the Department of Health and Human Services' Low-Income Home Energy Assistance Program.</li> <li>▶ Payments received under the Maine Indian Claims Settlement Act of 1980 (25 U.S.C. 1721);</li> <li>▶ The first \$2,000 of per capita shares received from judgment funds awarded by the Indian Claims Commission or the U.S. Claims Court and the interests of individual Indians in trust or restricted lands, including the first \$2,000 per year of income received by individual Indians from funds derived from interests held in such trust or restricted lands;</li> <li>▶ Amounts of scholarships funded under Title IV of the Higher Education Act of 1965, including awards under the Federal work-study program or under the Bureau of Indian Affairs student assistance programs;</li> <li>▶ Payments received from programs funded under Title V of the Older Americans Act of 1985 (Green Thumb, Senior Aides, Older American Community Service Employment Program);</li> <li>▶ Payments received on or after January 1, 1989, from the Agent Orange Settlement Fund or any other fund established pursuant to the settlement in the <u>In Re Agent Orange</u> product liability litigation, M.D.L. No. 381 (E.D.N.Y.);</li> <li>▶ Earned income tax credit refund payments received on or after January 1, 1991, including advanced earned income credit payments;</li> <li>▶ The value of any child care provided or arranged (or any amount received as payment for such care or reimbursement for costs incurred for such care) under the Child Care and Development Block Grant Act of 1990;</li> <li>▶ Payments received under programs funded in whole or in part under the Job Training Partnership Act (employment and training programs for Native Americans and migrant and seasonal farm workers, Job Corps, veterans employment programs, state job training programs and career intern programs, AmeriCorps).</li> <li>▶ Payments by the Indians Claims Commission to the Confederated Tribes and Bands of Yakima Indian Nation or the Apache Tribe of Mescalero Reservation;</li> <li>▶ Allowances, earnings, and payments to AmeriCorps participants under the National and Community Services Act of 1990;</li> <li>▶ Any allowance paid under the provisions of 38 U.S.C. 1805 to a child suffering from spina bifida who is the child of a Vietnam veteran;</li> <li>▶ 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; and</li> <li>▶ Allowances, earnings, and payments to individuals participating in programs under the Workforce Investment Act of 1998.</li> </ul>

### C. HOUSEHOLD MEMBERS INCOME TO COUNT

All adult household members living in the household (including those that may be temporarily absent) must have their income counted towards the annual income of the household.

Additionally, dependent members (child 17 or under; Full-time student over 18) for which benefits are provided are also included in annual income.

This chart summarizes whose income to count under Part 5:		
<b>Persons Counted in Household Size for the Purposes of Eligibility Calculation</b>	<b>Employment Income</b>	<b>Other Income</b> (Including income from Assets)
<ul style="list-style-type: none"> <li>• Head of Household</li> <li>• Spouse</li> <li>• Co-Head of Household</li> <li>• Other Adult</li> <li>• Dependents               <ul style="list-style-type: none"> <li>○ Child 17 or under</li> <li>○ Full-time Student 18 and over</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Yes</li> <li>Yes</li> <li>Yes</li> <li>Yes</li> <li>No</li> <li>See Note</li> </ul>	<ul style="list-style-type: none"> <li>Yes</li> <li>Yes</li> <li>Yes</li> <li>Yes</li> <li>Yes</li> <li>Yes</li> </ul>
<p><b>Nonmembers Not counted</b></p> <ul style="list-style-type: none"> <li>• Foster Adult</li> <li>• Foster Child 18 or under</li> <li>• Live-in Aide</li> </ul>	<ul style="list-style-type: none"> <li>No</li> <li>No</li> <li>No</li> </ul>	<ul style="list-style-type: none"> <li>No</li> <li>No</li> <li>No</li> </ul>
<p><b>NOTE:</b> Only count the first \$480 of earned income of a full-time student (enrolled for 12 or more units) older than 18 who is a dependent. Full time student status must be verified and documented in the file.</p>		

Special consideration is given to income earned by the following groups of people:

- **Minors.** Earned income of minors is not counted. However, unearned income attributable to a minor (e.g., child support, welfare payments and other benefits paid on behalf of a minor) is included.
- **Foster Children and Adults.** These persons are not included in the household member count. Also, since the foster children/adults are not counted as household members, the income received to care for these individuals is not included in the household income.
- **Live-In Aides.** If a household includes a paid live-in aide (whether paid by the household or a social service program), the income of the live-in aide, regardless of the source, is not counted. Except under unusual circumstances, a related person does not qualify as a live-in aide.
- **Persons with Disabilities.** During the annual recertification of a household’s income, Grantees are required to exclude from annual income certain increases in the income of a disabled member of qualified families residing in HOME-assisted housing or receiving HOME tenant-based rental assistance. This will be discussed in detail in Chapter Four.
- **Temporarily Absent Household Members.** The income of temporarily absent household

members is counted in the Part 5 definition of annual income – regardless of the amount the absent member contributes to the household. For example, a construction worker employed at a temporary job on the other side of the state earns \$600 per week. He keeps \$200 per week for expenses and sends \$400 per week home to his family. The entire amount (\$600 per week) is counted in the family’s income.

- **Adult Students Living Away from Home.** If the adult student is counted as a member of the household in determining the household size (to compare to the HUD income limits), the first \$480 of the student’s income must be counted in the household’s income. Note, however, that the \$480 limit does not apply to a student who is the head of household or spouse (their full income must be counted). To count the adult student as a household member, the adult student would need to be verified as a dependent, usually on the parent’s tax return. Additionally, student status must be verified with documentation in the file.
- **Permanently Absent Household Members.** If a household member is permanently absent from the household (e.g., a spouse who is in a nursing home), the head of household has the choice of either counting that person as a member of the household, and including income attributable to that person as household income, or specifying that the person is no longer a member of the household.  
\* If the household member is specified as being no longer a member, that member is not allowed to live in the assisted unit if short or medium term rental assistance is being provided.

#### D. TREATMENT OF ASSETS

There is no asset limitation for participation in any ESG funded activity. Income from assets (interest and dividends) is however included as part of annual income under the Part 5 definition.

In general terms, an asset is a cash or non-cash item that can be converted to cash. Household 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 HUD.

##### 1) **Part 5 Inclusions**

This table presents the Part 5 asset inclusions to be counted to determine annual income:

##### **Inclusions**

1. Cash held in savings accounts, checking accounts, safe deposit boxes, homes, etc. For savings accounts, use the current balance. For checking accounts, use the average 6-month balance. Assets held in foreign countries are considered assets.
2. Cash value of revocable trusts available to the applicant.

3. Equity in rental 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 all reasonable costs (e.g., broker fees) that would be incurred in selling the asset. Under HOME, equity in the family's primary residence is not considered in the calculation of assets for owner-occupied rehabilitation projects.
4. Cash value of stocks, bonds, Treasury bills, certificates of deposit and money market accounts.
5. Individual retirement, 401(K), and Keogh accounts (even though withdrawal would result in a penalty).
6. Retirement and pension funds.
7. Cash value of life insurance policies available to the individual before death (e.g., surrender value of a whole life or universal life policy).
8. Personal property held as an investment such as gems, jewelry, coin collections, antique cars, etc.
9. Lump sum or one-time receipts, such as inheritances, capital gains, lottery winnings, victim's restitution, insurance settlements and other amounts not intended as periodic payments.
10. Mortgages or deeds of trust held by an applicant.

## 2) **Part 5 Exclusions**

This table presents the Part 5 asset inclusions not to be counted to determine annual income:

### **Exclusions**

- 1) Necessary personal property, except as noted in number 8 of Inclusions, such as clothing, furniture, cars and vehicles specially equipped for persons with disabilities.
- 1) Interest in Indian trust lands.
- 1) Assets not effectively owned by the applicant. That is, when assets are held in an individual's name, but the assets and any income they earn accrue to the benefit of someone else who is not a member of the household and that other person is responsible for income taxes incurred on income generated by the asset.
- 1) Equity in cooperatives in which the family lives.
- 1) Assets not accessible to and that provide no income for the applicant.
- 1) Term life insurance policies (i.e., where there is no cash value).

**Assets that are Part of an Active Business.** "Business" does not include rental of properties that are held as an investment and not a main occupation.

## SECTION IV.....DETERMINATION OF PARTICIPANT SHARE.....

ESG funds may be used to pay housing owners/property management, utility companies and other third parties for what are considered financial assistance costs. Below details how a participant would either share in the cost or what financial assistance is available.

### A. LENGTH OF RENTAL ASSISTANCE

Dakota County will allow a household to access ESG funding for up to 24 months over a 3 year period, so long as the household remains eligible for assistance based on the criteria in Section I. The amount of the assistance will be re-evaluated every six (6) months.

#### B. COMPUTATION OF PARTICIPANT SHARE OR PORTION

Households will be required to contribute a minimum of \$50 or 30% of their Gross Monthly income, whichever is greater, towards their rent. This is considered to be the participant's share or portion of the rent.

All income, assets and expenses will be verified. The computation will follow the regulation under 24 CFR 5.609 as detailed in Section III. A household's annual income will be re-evaluated every six (6) months.

A household is not required to report changes in income until their next semi-annual re-evaluation. If a household does report a decrease in income, an adjustment to the tenant share will be conducted to be effective the month following the report of the change.

If a household cannot pay a minimum of \$50 toward their rent, the participant may submit a request for an exception to this payment to Dakota County. The request should include the length of the request (no longer than 3 months), the reason for the request and the anticipated resolution. The County will respond within 10 business days as to whether the request was granted. County staff will seek input from the Heading Home Dakota Housing and Services workgroup as needed. All exceptions, whether granted or denied, will be brought to the workgroup for discussion and consideration for changes to program standards

#### C. RENTAL APPLICATION FEES

ESG funding may be used to pay for an eligible participant's rental application fee. It is limited to three (3) application fees or up to \$150, whichever is less in a 12 month period.

#### D. SECURITY DEPOSIT

Security deposit assistance is available through the ESG program to ESG eligible recipients. Assistance will be limited to once (1) every 12 months.

#### E. LAST MONTH RENT

Payment for last month's rent is available to ESG eligible recipients but it cannot exceed one (1) month's rent and is included in the total rental assistance cap of 24 months.

A last month's rent payment cannot be provided or combined with any other federal program. Assistance will be limited to once (1) in every 12 months.



#### F. UTILITY DEPOSIT

Utility deposit assistance will be available through the ESG program to ESG eligible recipients. Assistance will be limited to three (3) deposits or up to \$150, whichever is less in a 12 month period.

#### G. UTILITY PAYMENT ASSISTANCE

Utility payment assistance will be available on a case by case basis. Eligible utility services include: Gas, Electric, Water and Sewage. The ESG participant must provide proof of responsibility to make utility payments prior to receiving assistance.

Payment assistance for utility arrears (up to six months) will have a limit of \$500 for an individual and \$1,000 for a family.

#### H. RENTAL ARREARS

Payment of rental arrears to allow an ESG recipient to access rental assistance in a new unit will be available but on a case by case basis.

#### I. ASSISTANCE WITH THE COST OF MOVING

Moving costs associated with moving to a new unit or storage is eligible for ESG assistance on a case by case basis. Assistance will be limited to once (1) every 12 months and up to \$1,000.

Service costs are also eligible for funding under ESG. Below details the services that will be provided:

#### J. HOUSING SEARCH AND PLACEMENT

Services to assist with the assessment of housing barriers, the development of an action plan to locate housing, outreach and negotiation with landlords and owners will be an eligible service to be pay for with ESG funding.

An evaluation of progress will be conducted every three (3) months. Specifically assisting a household to search for housing can be provided up to 12 months. If a household is unable to locate suitable housing within 12 months, search assistance will be terminated.

#### K. HOUSING STABILITY CASE MANAGEMENT

ESG funds may be used to pay cost of assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a program participant who resides in permanent housing or to assist a program participant in overcoming immediate barriers to obtain housing.

This assistance cannot exceed 30 days during the period the program participant is seeking permanent housing and cannot exceed 24 months during the period the program participant is living in permanent housing.

#### L. MEDIATION

Mediation between a tenant and owners will not be an eligible service to use ESG funding for at this time.

#### M. LEGAL SERVICES

Legal services will not be an eligible service to use ESG funding for at this time.

#### N. CREDIT REPAIR

Credit counseling will not be an eligible service to use ESG funding for at this time.

### SECTION V.....UNIT SELECTION AND CONTINUED ASSISTANCE REQUIREMENTS.....

#### A. CASE MANAGEMENT

Any ESG rental assistance recipient must meet with their case manager at a minimum of once (1) per month. More frequent appointments can be made as seen fit for the individual household.

The purpose of case management is to:

1. Help the participant receive appropriate supportive services.
2. Help the participant obtain other federal, state, and local assistance.
3. Help the participant to develop a plan and set goals to retain permanent housing once the assistance expires.
4. Oversee the progress of goal attainment to sustain permanent housing after assistance has expired.

A case manager will make three attempts per month to set up an appointment with the participants and will record attempts in case notes. Clients are strongly encouraged to participate in case management to make progress on goals.

#### B. UNIT SELECTION

Once the ESG recipient has been approved and determined to be eligible for rental assistance, the household must select a unit that is:

1. Within the Fair Market Rent (FMR) for the unit size. A household is permitted to rent a single-room.
2. The unit is located within Dakota County

3. A legally binding lease will be entered into by the participant and owner
4. The unit meets the housing standards of the ESG Program
5. The unit must also be determined to be rent reasonable for the area.

If the household is unable to secure a unit after six (6) months, the household must be re-evaluated for income and need. After an additional six (6) months, if the household has still not found suitable housing, the household will be deemed ineligible.

#### C. RENT REASONABLENESS

The standard HUD has adopted and must be enforced under ESG is the total rent charged for a unit must be reasonable in relation to the rents being charged during the same period for comparable units in the private, unassisted market and must not be in excess of rents being charged during the same period for comparable non-luxury unassisted units.

The rent reasonableness of the unit can be evaluated in Dakota County by one of the following approved methods:

1. Use of Rentometer; <https://www.rentometer.com/>
2. Evaluation of three unit rents in the area

#### D. UNIT INSPECTION

The unit will need to be inspected prior to rental assistance commencing subject to the ESG program shelter and housing standard regulations 24 CFR 576.403. Thereafter the unit must be inspected annually.

#### E. CONTRACT EXECUTION

A housing assistance payment (HAP) contract will be executed with the owner/manager of the property in which the ESG rental assistance recipient will reside in the selected unit. The contract will outline the rent for the term of the lease, the term of the contract (matching the lease), the address or room number of the assisted unit, the portion of rent the tenant will be responsible to pay and the assisted amount paid with ESG funds.

The contract should be executed prior to beginning of assistance. Dakota County's portion of the rent assistance for participants receiving ESG Rental Assistance terminates automatically and no further rental assistance payment can be made if:

1. The participant moved out of the assisted unit;
2. The lease was terminated or not renewed by either party;
3. The participant becomes ineligible to receive ESG rental assistance.

## SECTION VI.....TERMINATION OF BENEFITS.....

The following process will occur should a participant receiving rental assistance or housing relocation and stabilization services have their assistance terminated:

- 1) A written notice to the program participant containing a clear statement of the reasons for termination.
- 2) A review of the decision, in which the participant is given the opportunity to present written or oral objections before a person other than the person who approved the termination decision.
- 3) Written notice of the final decision to the program participant after a grievance has been made.

A case manager will make three attempts to deliver the written notice if the notice is returned and will document each attempt.

Termination does not bar the participant household from receiving ESG assistance at a later date for the same family or individual. If termination does occur, a household would be eligible for assistance again after 12 months from the final month that assistance was provided. Dakota County has not set a lifetime limit in which an individual household or family can receive assistance.

### A. MAXIMUM LIMIT ON ASSISTANCE

The maximum limit on rental assistance will be 24 months in a 3 year period.

### B. TERMINATION AS A RESULT OF INCOME

While receiving a subsidy under ESG Rental Assistance Program if the participant at re-evaluation has an income that exceeds 30% of AMI, the assistance must be terminated. Termination of assistance will be effective the 1<sup>st</sup> of the month after a 30 day notice has been provided to the participant and owner in cases where rental assistance is being provided.

### C. TERMINATION FOR MULTIPLE LEASE VIOLATIONS

If while receiving a subsidy under ESG Rental Assistance Program the participant is evicted or forced to move as a result of multiple lease violations, the participant's rental assistance may be terminated. Multiple lease violations can include but are not limited to: skipping from the unit, drug activity, unauthorized household members, non-payment of rent or tenant paid utilities.

### C. TERMINATION FOR NON-COMPLIANCE

While receiving a subsidy under ESG Rental Assistance Program if the participant fails to provide requested information, the participant's rental assistance is subject to termination for non-compliance with the program regulations.

#### D. TERMINATION AS A RESULT OF ABSENCE FROM A UNIT FOR MORE THAN 180 DAYS

While receiving a subsidy under ESG Rental Assistance Program if the participant is absent from their assisted unit for more than 180 consecutive days, the participant's rental assistance may be subject to termination.

#### E. PROHIBITION OF DUPLICATE SUBSIDIES

While receiving a subsidy under ESG Rental Assistance Program, participants may not participate in any other federal assisted housing programs (see definition below). The participant must use the assisted unit as their sole residence and may not receive any duplicate housing subsidies for their unit or another housing unit. Acceptance of an on-going stipend from an outside party in order to pay the minimum rent required for the program is not considered a duplicate subsidy.

*Federally assisted housing* means housing assisted under any of the following programs:

(1) Public housing;

(2) Housing receiving project-based or tenant-based assistance under Section 8 of the U.S. Housing Act of 1937 (42 U.S.C. 1437f);

(3) Housing that is assisted under section 202 of the Housing Act of 1959, as amended by section 801 of the National Affordable Housing Act (12 U.S.C. 1701q);

(4) Housing that is assisted under section 202 of the Housing Act of 1959, as such section existed before the enactment of the National Affordable Housing Act;

(5) Housing that is assisted under section 811 of the National Affordable Housing Act (42 U.S.C. 8013);

(6) Housing financed by a loan or mortgage insured under section 221(d)(3) of the National Housing Act (12 U.S.C. 1715/(d)(3)) that bears interest at a rate determined under the proviso of section 221(d)(5) of such Act (12 U.S.C. 1715/(d)(5));

(7) Housing insured, assisted, or held by HUD or by a State or local agency under section 236 of the National Housing Act (12 U.S.C. 1715z-1); or

(8) Housing assisted by the Rural Development Administration under section 514 or section 515 of the Housing Act of 1949 (42 U.S.C. 1483, 1484).

#### F. PROHIBITION OF PORTABILITY

The ESG Rental Assistance Program provides rent subsidies only for eligible households residing in Dakota County. Exceptions to this provision will be made on a case-by-case basis. Documentation of such approval will detail the rationale for approving such exception.

The subsidy is not transferrable to any other housing unit without prior approval. Dakota County's portion of the rent assistance for participants receiving ESG Rental Assistance terminates automatically upon vacating the assisted unit.

## SECTION VII.....GRIEVANCE PROCEDURES.....

### A. INFORMAL REVIEWS FOR APPLICANTS

1. Dakota County will provide applicants with the opportunity for an informal review of decisions denying:
  - a. Participation in the program
  
2. Informal reviews are not required for established policies and procedures such as:
  - a. Determination that a unit's rent is more than the FMR;
  - b. The unit does not pass inspection or;
  - c. The unit is deemed not rent reasonable.
  
3. denial notice will describe:
  - a. The reasons for the decision
  - b. The family's right to informal review
  - c. The procedures and time frames for obtaining a review

### B. INFORMAL HEARING FOR PARTICIPANTS

1. Dakota County will give the program participant an opportunity for an informal hearing to consider whether decisions relating to the individual circumstances of the participant are in accordance with law and Dakota County rules in the following cases:
  - a. A determination of the computation of the amount of housing assistance payment to the participant.
  - b. A decision to deny or terminate assistance on behalf of the participant.

Written notice of these determinations by Dakota County will state that if the participant does not agree with the decision, they may request an informal hearing on the decision within fourteen (14) calendar days of the date of mailing.

A case manager will make three attempts to deliver the written notice if the notice is returned and will document each attempt.

2. Informal hearings are not required for established policies and procedures such as:
  - a. Maximum term of 24-month subsidy is reached
  - b. Refusal to attend/participate in case management
  
3. The guidelines for the informal hearing include:
  - a. Any person or persons designated by Dakota County, other than the person who made or approved the decision under review or a subordinate of that person, will conduct the hearing.
  - b. At his or her own expense, a lawyer or other representative may represent the participant.
  - c. Dakota County and the participant will have the opportunity to present evidence and question any witnesses.
  - d. The person who conducts the hearing shall issue a written decision, stating briefly the reasons for the decision, within fourteen (14) calendar days of the hearing. The participant promptly receives a copy of the hearing decision.

## CHAPTER V

### HMIS §576.103

Under this component, ESG funds may be used for ESG grantees and subrecipients' participation in the HMIS collection and analyses of data on individuals and families who are homeless and at-risk of homelessness.

Eligible costs under ESG include:

- Contributing data to the HMIS designated by the CoC of Dakota County
- Costs for managing the HMIS system
- Cost to establish and operate a comparable database for victim services or legal service providers

Dakota County has chosen not to fund this component with ESG; rather other resources have been dedicated to these types of activities.

## CHAPTER VI

### OTHER FEDERAL REQUIREMENTS

#### A. NONDISCRIMINATION AND EQUAL OPPORTUNITY REQUIREMENTS

Federal law prohibits housing discrimination based on race, color, national origin, religion, sex, familial status, or disability. Eligibility for ESG assistance will be based upon the criteria noted in the various chapters and made available without regard to race, color, national origin, religion, to actual or perceived sexual orientation, gender identity, familial or marital status, or disability.

#### B. PROHIBITION OF INQUIRIES ON SEXUAL ORIENTATION OR GENDER IDENTITY

For the purpose of determining eligibility for ESG assistance or otherwise making such housing available, Dakota County prohibits inquiries regarding sexual orientation or gender identity. It does not prohibit any individual from voluntarily self-identifying sexual orientation or gender identity.

Prohibition on inquiries does not prohibit lawful inquiries of an applicant or occupant's sex where the housing provided or to be provided to the individual is temporary, emergency shelter that involves the sharing of sleeping areas or bathrooms, or inquiries made for the purpose of determining the number of bedrooms to which a household may be entitled.

#### C. DEBARRED, SUSPENDED, OR INELIGIBLE CONTRACTORS AND PARTICIPANTS

The prohibitions at 2 CFR part 2424 on the use of debarred, suspended, or ineligible contractors and participants.



## CHAPTER VII

### REPORTING AND RECORD KEEPING

As indicated in other sections, documentation must be collected and maintained in a participant file for compliance with ESG regulations. Records of payment and program participant records must be maintained for a minimum five (5) years after all funds from the fiscal year of ESG funds were expended.

Dakota County will collect the following information for each participant file (dependent upon assistance being provided) and will use the provided checklist in each ESG participant file.

- Referral (Either from Coordinated Assessment or Service Provider)
- Program eligibility determination
  - Proof of homelessness
    - written observation of outreach worker, or
    - written referral by another housing or service provider, or
    - certification by head of household seeking assistance
- Signed program participant agreement
- Completed HMIS assessment and release form
- Proof of client annual income and documentation for determination of income
- Lease documentation
- Certification of Fair Market Rent (FMR) and rent reasonableness
- Completed Habitability Inspection form
- Lead based paint notification
- Housing Assistance Payment Contract
- Case management – once per month
- Case plan to assist the program participant to retain permanent housing after the ESG assistance ends
- Date of re-evaluation of program eligibility and result of eligibility determination
  - Income cannot exceed 30% of AMI upon re-evaluation of eligibility
  - Participant continues to lack sufficient resources to retain housing without ESG funds

## CHAPTER VIII

### STANDARDS FOR PROGRAM EVALUATION

Dakota County will continue to work with the local CoC to further develop evaluation standards for 2016.

## CHAPTER IX

### STANDARDS FOR MAKING SUBAWARDS

An application will require information regarding the services an organization would be able to provide, the cost of such services and a budget for all program expenditures.

A request for proposals will be distributed as widely as possible. An announcement will go to all local agencies currently providing emergency shelter services and homelessness prevention and rapid re-housing services and to all participants in the Continuum of Care. Public service announcements will be placed in the local papers within the area covered by the Continuum of Care. A service announcement will be placed on the Dakota County website and Dakota County CDA website.

A due date for applications shall be clearly publicized along with the request for proposals. All potential applicants will be given approximately four weeks after the initial announcement to submit their applications. Potential applicants will be provided with all requirements and responsibilities to be assumed with receipt of sub-awards.

Applications will be reviewed by the ESG Committee comprised of Dakota County and CDA staff. Applications will be reviewed with respect to applicants' abilities to provide shelter services or homelessness prevention and rapid re-housing services under the guidelines set forth by HUD and by the recipient (Dakota County).

The ESG Committee will recommend the most qualified service provider(s). This recommendation will be presented to the Dakota County Community Services Committee of the Whole seeking their recommendation to the Dakota County Board of Commissioners. The Dakota County Board of Commissioners then has the decision to approve or deny the recommendation. If approved, Dakota County will enter into a contract with the approved applicant.

## 2016 DAKOTA COUNTY ANTI-DISPLACEMENT POLICY

### PART I. MINIMIZING DISPLACEMENT

It is the goal of Dakota County to minimize displacement of persons from their homes and neighborhoods when utilizing Community Development Block Grant (CDBG) or HOME Investments Partnership Program (HOME) funds. Displacement has been defined as the involuntary movement of a household from a dwelling as a result of its acquisition, rehabilitation or demolition when funded in whole or in part with CDBG or HOME funds, or if funded with non-CDBG/HOME when the activity is a prerequisite for some other CDBG/HOME funded activity. Displacement also includes involuntary movement of a business from a commercial property. In an effort to minimize displacement of households, the following steps will be taken:

1. With the exception of lead based paint hazard reduction, owner occupied properties will not be rehabilitated if displacement is expected to occur. To safely reduce the hazards of lead based paint, the occupants must vacate the impacted areas until a clearance test determines the area is safe. When the impacted areas include the sole means of entry or all entries to the dwelling, the kitchen or food preparation areas, or the sole bathroom or all bathrooms, or the entire dwelling area, the occupants must completely vacate the unit until a successful clearance test is received after the completion of the lead based hazard reduction work.

Relocation is voluntary. The homeowner will sign a waiver form acknowledging that they are relocating voluntarily, and that the CDA is not responsible for any costs associated with the relocation, other than a stipend payment of \$500.00 that is payable to the homeowner when it is necessary to vacate the residence for a continuous time of 24 hours (or one full day and one full night) during the course of the lead based paint hazard reduction work.

2. Businesses will not receive loans for rehabilitation or expansion if any residential displacement would occur as a result of the rehabilitation or expansion unless such activities are essential for economic development of a community.
3. If acquisition or demolition activities require displacement of a household, the acquiring entity will follow the procedures established in Part II (Displacement Action Policies).
4. Code enforcement activities and neighborhood groups will not receive CDBG or HOME funds, therefore eliminating the possibility of displacement through code enforcement or through the activities of a neighborhood group.

### PART II. DISPLACEMENT ACTION POLICIES

- A. Eligible households as defined by the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (the Uniform Act) that are displaced as a result of CDBG or HOME funded activities will be eligible for moving and/or rental payments at levels as described in the Uniform Act.
  1. Persons displaced as a result of CDBG/HOME funded activities will be eligible for moving and/or rental payments at levels described in the Uniform Act.

2. Referrals will be made to agencies that furnish financial counseling, health and social services, or other services that may be helpful to displaced persons.
  3. Low and moderate income persons will be given a displacement priority for admission to Low Income Public Housing and Section 8 Housing Assistance Program in Dakota County.
  4. All affected persons will be informed of their rights under the policies and procedures set forth under the regulations in the Uniform Act, including their rights under Title VI of the Civil Rights Act of 1964 and Title VIII of the Civil Rights Act of 1968.
  5. The projects will be planned and implemented in a manner so as to minimize hardship to the site occupants and involve the least possible degree of displacement in accordance with the needs of the program and the persons displaced.
  6. Efforts will be made to provide those persons to be displaced as a result of the activities of the project an opportunity to obtain comparable replacement housing that is:
    - within their financial means and meets their needs;
    - reasonably accessible to their places of employment, potential employment, transportation and other commercial and public facilities; and
    - available on a non-discriminatory basis
  7. Displaced businesses will be eligible for benefits as required by the Uniform Act.
- B. Persons displaced through any rental rehabilitation activities will be assisted in accordance with the Uniform Act or through a process including the following actions:
1. Permanent displacement of a low income person or family will not occur as a result of CDBG or HOME funded activities unless:
    - a. A rental assistance voucher or certificate is available to the person or family that allows them to move to a comparable affordable unit; or
    - b. An acceptable comparable affordable unit is located for the person or family without the provision for rental assistance, and the person or family willingly moves to such a unit; and
    - c. The acquiring entity follows the regulations of the Uniform Act.
  2. If it is necessary to temporarily displace tenants in order to accomplish the rehabilitation, it is the responsibility of the owner of the rental unit to reimburse the tenants for their expenses or inconvenience associated with such temporary displacement, according to applicable state and federal laws.

## **Relocation, Displacement, and Replacement Housing Plan for the 2016 Dakota County CDBG Program**

In accordance with the requirements of 24 CFR 507.606 (c)(1)(iii), the following Plan has been prepared and shall be applicable to the activities listed herein funded through the Dakota County Community Development Block Grant Program (CDBG). This plan is public and is part of the Subrecipient Agreements between the Cities undertaking the activities and the Dakota County CDA governing administration of the CDBG Program.

The following activities involve vacant structures and/or voluntary transactions. If involuntary displacement occurs, the acquiring entity will follow provisions of the Uniform Act.

### **1. Proposed CDBG Activities Which Involve Acquisition, Demolition, or Conversion**

- A. South St. Paul – Acquisition and demolition of substandard, blighted, and dilapidated residential properties in the City of South St. Paul.
- B. Lakeville – Acquisition and demolition of vacant substandard and blighted commercial property located in the City of Lakeville.
- C. Northfield – Acquisition and rehabilitation of the North-South Oak Apartment complex to ensure continued affordability of 43 multi-family units in the City of Northfield.

### **2. Location and Type of Housing Units Affected; Actions to be Taken**

- A. South St. Paul - Housing units acquired and demolished will be located throughout the City of South St. Paul. Units affected will be those units that are vacant, uninhabitable, under code enforcement orders, repossessed by the VA or FHA, or otherwise substandard or causing a blighting influence on the surrounding neighborhood. Some acquisitions may be owner initiated. Acquired units will undergo an inspection to determine the feasibility of rehabilitation. When rehabilitation is physically and economically infeasible, acquired units will be demolished. Public notices will announce the units identified for acquisition and demolition or rehabilitation. The South St. Paul HRA anticipates that acquired properties will be vacant or the residents will voluntarily relocate, if involuntary displacement does occur, the South St. Paul HRA will follow the provisions of the Uniform Act.
- B. Lakeville - Property acquired will be located at 9210 - 202<sup>nd</sup> St. W., which is generally at the southeast corner of Dodd Boulevard and 202<sup>nd</sup> Street W. The property is an abandoned gas station with an attached single-family residence. All structures will be removed. The sale will be voluntary and there is no threat of condemnation or eminent domain by the City. The City intends to retain the property for potential Right-of-Way. The property will not be sold for future development because of site access constraints.
- C. Northfield – The North Oak and South Oak Apartments are federally assisted multi-family rental housing generally located at the northwest corner of Spring Street N. and Greenvale Avenue W. in the City of Northfield. The 43 unit apartment complex was built in the 1980s with USDA Rural Development financing. In 2014, current owners gave notice to the Rural Development of their intent to pay off the financing and convert the apartments to market rate units, which would have an adverse impact on underserved populations in Northfield. Three Rivers Community Action Agency, with support from the City of Northfield, intends to purchase the property and rehab the units in order to retain

affordability. Twenty-six (26) of the units will be affordable to households at 50% AMI or below, and 16 units will be affordable to households at 60% AMI or below. One unit will be reserved for an on-site manager. The sale is voluntary and there is no threat of condemnation or eminent domain by the City. However, if involuntary displacement does occur, the City and Three Rivers Community Action Agency will follow the provisions of the Uniform Act.

### **3. Schedule for Project Implementation**

The activities under this project will generally occur between July 1, 2015 and June 30, 2016.

### **4. Replacement Units**

Where units must be replaced in accordance with the regulations cited above, the Cities will cooperate and coordinate with the Dakota County CDA and the Twin Cities Chapter of Habitat for Humanity, or with other groups/entities as appropriate, to provide replacement units that are created either on the sites cleared or at other locations within the participation area for the Dakota County CDBG Program. Please see attached list for replacement units already constructed or in planning stages.

### **5. Ten Year Affordability Assurance**

The Family Housing units constructed, owned, and/or managed by Dakota County CDA are intended to be low and moderate income housing for the entire life of the units. Properties developed by private developers using tax credits must adhere to a fifteen (15) year period of affordability. If HOME funds assist with construction, units must remain affordable for twenty (20) years. Any unit used for the purpose of replacement housing will remain affordable for at least ten (10) years from the date of initial occupancy by the relocated household.

## **DAKOTA COUNTY CDA REPLACEMENT UNITS AVAILABLE FOR THE 2016 ANTIDISPLACEMENT PLAN**

**Note: More details and updates can be found at [www.dakotacda.org](http://www.dakotacda.org).  
All developments have accessible units.**

Parkside – 122<sup>nd</sup> Street, Burnsville

Twenty-two units of low/moderate income rental housing for families opened for occupancy June 1992. This development includes 3 two-bedroom units, 18 three bedroom units, and 1 two bedroom accessible unit. Dakota County CDA is the property manager.

Spruce Point – East of hwy 52, off of Chandler Lane, Inver Grove Heights

Twenty-four units of low/moderate income rental housing for families opened for occupancy August 1995. This development includes 4 two-bedroom units, 19 three-bedroom units, and 1 two-bedroom accessible unit. Dakota County CDA is the property manager.

Oak Ridge – South of Diffley & east of Johnny Cake Road, Eagan

Forty-two units of low/moderate income rental housing for families opened for occupancy August 1996. This development includes 18 two-bedroom units, 22 three-bedroom units, and 2 two-bedroom accessible units. Dakota County CDA is the property manager.

Pleasant Ridge – North Frontage Road, Hastings

Thirty-one units of low/moderate income rental housing for families opened for occupancy August 1997. This development includes 14 two-bedroom units, 15 three-bedroom units, and 2 two-bedroom accessible units. Dakota County CDA is the property manager.

Glenbrook -- Germaine Ave., Apple Valley

Thirty-nine units of low/moderate income rental housing for families opened for occupancy in 1998. This complex contains 17 two-bedroom units and 22 three-bedroom units. Dakota County CDA is the property manager.

Cedar Valley – Dodd and Cedar, Lakeville

Thirty units of low/moderate income rental housing for families opened for occupancy in 1998. This complex contains 14 two-bedroom units, 15 three-bedroom units and 1 one-bedroom accessible unit. Dakota County CDA is the property manager.

Chasewood -- 155<sup>th</sup> Street, Apple Valley

Twenty-seven units of low/moderate income rental housing for families opened for occupancy in 1999. This complex contains 14 two-bedroom units and 13 three-bedroom units. Dakota County CDA is the property manager.

Country Lane – 210<sup>th</sup> Street West & Hamburg Ave., Lakeville

Twenty-nine units of low/moderate income rental housing for families opened for occupancy in 2001. This complex contains 15 two-bedroom units and 14 three-bedroom units. Dakota County CDA is the property manager.

Hillside Gables – Lexington Ave. & I35E, Mendota Heights

Twenty-three units of low/moderate income rental housing for families opened for occupancy September, 2001. This complex contains 17 two-bedroom units and 6 three-bedroom units. Dakota County CDA is the property manager.

Marketplace – South Frontage Rd., Hastings

Twenty-eight units of low/moderate income rental housing for families opened for occupancy September, 2002. This development includes 13 two-bedroom units, 14 three-bedroom units, and 1 one-bedroom accessible unit. Dakota County CDA is the property manager.

Heart of the City – East Traveler’s Trail, 125<sup>th</sup> Street, & 1<sup>st</sup> Ave, Burnsville

Thirty-four units of low/moderate income rental housing for families opened for occupancy in 2003. This development includes 1 one bedroom unit, 21 two-bedroom units, and 12 three-bedroom units. Dakota County CDA is the property manager.

Erin Place – Cedar Path, Eagan

Thirty-four units of low/moderate income rental housing for families opened for occupancy in 2004. This development includes 24 two-bedroom units and 10 three-bedroom units. Dakota County CDA is the property manager.

Cedar Villas – Villa Parkway, Eagan

This development, owned by Shelter Corporation, was developed in conjunction with Erin Place with 104 units, including 60 two-bedroom units and 44 three-bedroom units. This development is a mix of both affordable and market rate units.

Prairie Crossing – Icefall Trail & Icefall Way, Lakeville

Forty units of low/moderate income rental housing for families opened for occupancy in 2005. This development includes 20 two-bedroom units and 20 three-bedroom units. Dakota County CDA is the property manager.

Lafayette – 50<sup>th</sup> Street East, Inver Grove Heights

Thirty units of low/moderate income rental housing for families opened for occupancy in 2006. This development includes 1 one-bedroom, 15 two-bedroom units, and 14 three-bedroom units. Dakota County CDA is the property manager.

West Village – South Frontage Rd, Hastings

Twenty-one units of low/moderate income rental housing for families opened for occupancy in 2007. This development includes 11 two-bedroom units, and 10 three-bedroom units. Dakota County CDA is the property manager.

Carbury Hills – Connemara Trail, Rosemount

Thirty-two units of low/moderate income rental housing for families opened for occupancy in 2008. This development includes 24 two-bedroom units, and 8 three-bedroom units. Dakota County CDA is the property manager.

Twin Ponds – 223<sup>rd</sup> Street, Farmington

Fifty-one units of low/moderate income rental housing for families opened for occupancy in 2009 and a second phase opened in 2012. This development includes 35 two-bedroom units, 14 three-bedroom units, and 2 two-bedroom accessible units. Dakota County CDA is the property manager.



Meadowlark – 210<sup>th</sup> Street and Holiday Ave., Lakeville

Forty units of low/moderate income rental housing for families opened for occupancy in 2010. This development includes 6 one-bedroom units, 24 two-bedroom units, and 10 three-bedroom units. Dakota County CDA is the property manager.

Quarry View – Embry Path, Apple Valley

Forty-five units of low/moderate income rental housing for families opened for occupancy mid-2011. This development includes 31 two-bedroom units, 13 three-bedroom units, and 1 one-bedroom accessible unit. Dakota County CDA is the property manager.

Northwood – Northwood, Eagan

Forty-seven units of low/moderate income rental housing for families opened for occupancy summer 2013. This development includes 22 two-bedroom units, 10 three-bedroom units, and 2 one-bedroom accessible units. Dakota County CDA is the property manager.

Inver Hills – College Trail and Bower Path, Inver Grove Heights

Twenty-four units of low/moderate income rental housing for families opened for occupancy January 2014. This development includes 13 two-bedroom units, 10 three-bedroom units, and 1 two-bedroom accessible unit. Dakota County CDA is the property manager.

Riverview Ridge – Sibley Memorial Highway, Eagan

Twenty-seven units of low/moderate income rental housing for families anticipated to open for occupancy summer 2014. This development includes 15 two-bedroom units, 10 three-bedroom units, and 2 two-bedroom accessible units. Dakota County CDA is the property manager.

Lakeshore Townhomes - Jurdy Road and Shoreline Drive, Eagan

Fifty units of low/moderate income rental housing for families opened for occupancy in summer 2015. This development includes 2 one-bedroom units, 21 two-bedroom units, 24 three-bedroom units, 1 one-bedroom accessible unit, and 2 two-bedroom accessible units. Dakota County CDA is the property manager.

**BOARD OF COUNTY COMMISSIONERS  
DAKOTA COUNTY, MINNESOTA**

May 3, 2016  
Motion by Commissioner Slavik

Resolution No. 16-243  
Second by Commissioner Holberg

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**Approval Of Dakota County Federal Fiscal Year 2016 One-Year Action Plan For Community Development Block Grant, HOME Investment Partnership, And Emergency Solutions Grant Programs**

WHEREAS, Dakota County is an Entitlement County for funds through the Community Development Block Grant (CDBG) Program and Emergency Solutions Grant (ESG) Program and a Participating Jurisdiction for the HOME Investment Partnerships (HOME) Program; and

WHEREAS, the Dakota County Community Development Agency (CDA) administers the CDBG, ESG, and HOME programs on behalf of Dakota County, thereby requiring agreements between the U.S. Department of Housing and Urban Development (HUD) and Dakota County for the CDBG, ESG, and HOME funds and between Dakota County and the Dakota County CDA for CDBG, ESG, and HOME program administration; and

WHEREAS, HUD requires the development and submission of the One-Year Action Plan (2016 Action Plan) for Federal Fiscal Year 2016 (FFY 2016) that proposes allocation of the annual CDBG, HOME, and ESG funds to local governments and housing providers in the County; and

WHEREAS, CDA staff has worked with participating communities to identify CDBG, HOME, and ESG activities for FFY 2016; and

WHEREAS, the proposed activities for the HUD funds meet the housing and community development priorities identified in the approved Five-Year Consolidated Plan (2015-2019); and

WHEREAS, the Dakota County CDBG allocation is \$1,772,394; the Dakota County HOME allocation is \$594,487 (total Consortium allocation of \$1,769,304); and the Dakota County ESG allocation is \$150,546 for FFY 2016; and

WHEREAS, CDA staff recommends funding 29 CDBG eligible activities for the 12 cities with populations more than 10,000 with direct allocation funding; four CDBG eligible activities with competitive pool funds for cities and townships with populations less than 10,000; and five countywide activities with FFY 2016 CDBG funds; and

WHEREAS, CDA staff recommends funding three HOME activities as follows: new construction (75 percent), unallocated Community Development Housing Organization project (15 percent), and administration (10 percent) with FFY 2016 HOME funds; and

WHEREAS, CDA staff recommends funding four ESG activities as follows: emergency shelter operations (21 percent), rapid rehousing assistant payments (50 percent), housing relocation and stabilization services (21.5 percent), and administration (7.5 percent) with FFY 2016 ESG funds; and

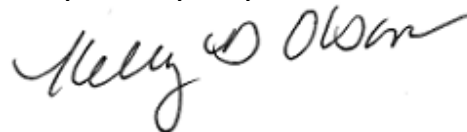
WHEREAS, Dakota County is required to submit the 2016 Action Plan to HUD by May 15, 2016; and

**STATE OF MINNESOTA  
County of Dakota**

	<b>VOTE</b>
<b>Slavik</b>	Yes
<b>Gaylord</b>	Yes
<b>Egan</b>	Yes
<b>Schouweiler</b>	Yes
<b>Workman</b>	Yes
<b>Holberg</b>	Yes
<b>Gerlach</b>	Yes

I, Kelly Olson, Clerk to the Board of the County of Dakota, State of Minnesota, do hereby certify that I have compared the foregoing copy of a resolution with the original minutes of the proceedings of the Board of County Commissioners, Dakota County, Minnesota, at their session held on the 3rd day of May, 2016, now on file in the County Administration Department, and have found the same to be a true and correct copy thereof.

Witness my hand and official seal of Dakota County this 5th day of May, 2016.



Clerk to the Board

WHEREAS, HUD requires the designation of a certifying officer for environmental reviews associated with the CDBG, HOME, and ESG activities, and HUD also requires that environmental reviews associated with Capital Fund activities be signed by the highest ranking County official or designee for CDBG, HOME, and ESG; and

WHEREAS, HUD requires a public notice be published and a public hearing be held to receive comments and inform the public on the 2016 Action Plan that outlines the strategies and objectives for the proposed allocation of 2016 CDBG, HOME, and ESG funds; and

WHEREAS, the Dakota County Board of Commissioners conducted a public hearing on April 5, 2016 to receive comments on the 2016 Action Plan, and no comments were received at the hearing nor were comments submitted to the CDA.

NOW, THEREFORE, BE IT RESOLVED, That the Dakota County Board of Commissioners approves the Dakota County 2016 Action Plan, for submission to HUD, and hereby approves the 2016 Residential Anti-Displacement and Relocation Assistance Plan and the 2016 Citizen Participation Plan; and

BE IT FURTHER RESOLVED, That the County Board Chair is hereby authorized to sign the application to HUD for FFY 2016 CDBG, HOME, and ESG Programs and the Local Government and Specific CDBG, HOME, and ESG Certifications; and

BE IT FURTHER RESOLVED, That the County Board Chair is hereby authorized to execute FFY 2016 CDBG, ESG, and HOME agreements with HUD for the acceptance of CDBG funds of \$1,772,394, HOME funds of \$1,769,304 for the Consortium and \$594,487 to Dakota County, and ESG funds of \$150,546 and to execute a sub-recipient agreement with the Dakota County CDA for the administration of the CDBG, HOME, and ESG Programs, subject to approval by the County Attorney's Office as to form; and

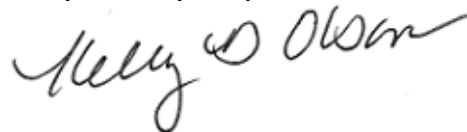
BE IT FURTHER RESOLVED, That the Dakota County CDA Director of Community and Economic Development is hereby designated as the certifying officer for environmental reviews for the CDBG, HOME, ESG, and Capital Fund Programs.

**STATE OF MINNESOTA**  
**County of Dakota**

	<b>VOTE</b>
<b>Slavik</b>	Yes
<b>Gaylord</b>	Yes
<b>Egan</b>	Yes
<b>Schouweiler</b>	Yes
<b>Workman</b>	Yes
<b>Holberg</b>	Yes
<b>Gerlach</b>	Yes

I, Kelly Olson, Clerk to the Board of the County of Dakota, State of Minnesota, do hereby certify that I have compared the foregoing copy of a resolution with the original minutes of the proceedings of the Board of County Commissioners, Dakota County, Minnesota, at their session held on the 3rd day of May, 2016, now on file in the County Administration Department, and have found the same to be a true and correct copy thereof.

Witness my hand and official seal of Dakota County this 5th day of May, 2016.



Clerk to the Board

<b>Dakota County Community Development Agency</b>		
Adopted: 12/15/2015	<b>PROCUREMENT POLICY</b>	Resolution #: 15-5648

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# PROCUREMENT POLICY

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## 1.0 INTRODUCTION

**1.1 General.** Established for the Dakota County Community Development Agency (hereinafter, the “CDA”) by Action of the CDA Board of Commissioners (Board) on December 15, 2015, this Procurement Policy (Policy) complies with the Annual Contributions Contract (ACC) between the CDA and the United States Department of Housing and Urban Development (HUD), Federal Regulations at 2 CFR §200.317-326, *Procurement Standards*, the procurement standards of the Procurement Handbook for Public Housing Authorities (PHAs), HUD Handbook 7460.8, REV 2, and applicable state and local laws.

## 2.0 GENERAL PROVISIONS

**2.1 General.** The CDA shall:

**2.1.1** Provide safeguards for maintaining a procurement system of quality and integrity;

**2.1.2** Provide for the fair and equitable treatment of all persons or firms involved in purchasing by the CDA;

**2.1.3** Ensure that supplies and services (including construction) are procured efficiently, effectively, and at the most favorable and valuable prices available to the CDA;

**2.1.4** Promote competition in contracting; and

**2.1.5** Assure that CDA purchasing actions are in full compliance with applicable federal standards, HUD regulations and state and local laws.

**2.2 Application.** This Policy applies to all procurement actions of the CDA, except as noted under “Exclusions” below. Nothing in this Policy shall prevent the CDA from complying with the terms and conditions of any grant, contract, gift or bequest that is otherwise consistent with law.

**2.3 Funding Source.** The CDA receives funds from federal, non-federal and private funding sources. In its procurement activities, the CDA shall develop procedures to ensure compliance with applicable laws and regulations without necessarily imposing a higher standard than is necessary. Where a requirement in this Policy is based solely on federal requirements, the CDA’s Executive Director or their designee may, on a case-by-case basis for non-federally funded procurements, apply a less stringent standard than is outlined in the federal requirements, provided however that it is otherwise consistent with applicable Policies and all state and other legal requirements are met. When both HUD and non-Federal funds are used, the funds should be separately identified prior to procurement so

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that appropriate requirements can be applied, if necessary. If it is not possible to separate the funds, HUD procurement regulations shall be applied to the total procurement. If funds can be separated, then regulations applicable to the source of funding may be followed.

- 2.4 Definition.** The term “procurement,” as used in this Policy, includes the procuring, purchasing, leasing, or renting of: (1) goods, supplies, equipment, and materials, (2) construction and maintenance; (3) consultant services; (4) Architectural and Engineering (A/E) services, (5) social services, and (6) other services.
- 2.5 Direct Payments List.** The Direct Payments List (also known as competitive exceptions) is a list of transactions which, by the nature of the transaction, are impractical or impossible to competitively bid because of market or other conditions, and are exempt from competitive bidding requirements. These transactions do not have to be justified as a Non-Competitive Procurement but may be obtained directly.
- 2.5.1** The Executive Director or their designee may establish a Direct Payments List without seeking approval of the Board of Commissioners, provided that the list is consistent with applicable statutory and regulatory requirements and that the list is made readily available to CDA employees.
- 2.5.2** In the event of ambiguity or uncertainty as to whether an item is or is not subject to competition and whether it should be placed on the Direct Payments List, the Executive Director or their Designee shall review the matter and make a final determination.
- 2.6 Exclusions.** This policy does not govern the following:
- 2.6.1** Real Estate Purchase and Sale Transactions. (Surveys, appraisals, environmental site assessments, and financing analysis are considered consultant services and are governed by these Policies);
- 2.6.2** Loan transactions and documents;
- 2.6.3** Subrecipient or sub-grantee agreements;
- 2.6.4** Employment contracts;
- 2.6.5** Limited partnership agreements;
- 2.6.6** Award of housing, vouchers or assistance to non-profit agencies; and
- 2.6.7** Housing Assistance Payment contracts.



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- 2.7 Conflict Between Policies and Other Laws and Regulations.** In the event of a conflict between these Policies and any applicable law or regulation, the law or regulation will prevail.
- 2.8 Changes in Laws and Regulations.** In the event an applicable law or regulation is modified or eliminated, or a new law or regulation is adopted, the revised law or regulation shall, to the extent inconsistent with these Policies, automatically supersede these Policies. The Executive Director or their designee shall make the appropriate modifications to the Policies to reflect these changes.
- 2.9 Public Access to Procurement Information.** Most procurement information that is not proprietary is a matter of public record and shall be available to the public to the extent provided in the Minnesota Data Practices Act.

### 3.0 ETHICS IN PUBLIC CONTRACTING

- 3.1 General.** The CDA hereby establishes this code of conduct regarding procurement issues and actions and shall implement a system of sanctions for violations. This code of conduct, etc., is consistent with applicable federal, state, or local law, including Minnesota Statutes Chapter 10, Ethics in Government.
- 3.2 Conflicts of Interest.** No employee, officer, Board member, or agent of the CDA shall participate directly or indirectly in the selection, award, or administration of any contract if a conflict of interest, either real or apparent, would be involved. Such a conflict of interest would arise when the following have a financial interest in, or a tangible personal benefit from a firm considered for a contract:
- 3.2.1** An employee, officer, Board member, or agent involved in making the award; or
  - 3.2.2** Any member of his or her immediate family; or
  - 3.2.3** His/her partner; or
  - 3.2.4** An organization which employs or is negotiating to employ, or has an arrangement concerning prospective employment of any of the above.
- 3.3 Gratuities, Kickbacks, and Use of Confidential Information.** No officer, employee, Board member, or agent of the CDA shall ask for or accept gratuities, favors, or items of more than nominal value from any contractor, potential contractor, or party to any subcontract (also the acceptance of gifts is expressly prohibited under Minnesota Statutes, Chapter 10A 471.87 and 471.895), and shall not knowingly use confidential information for actual or anticipated personal gain.

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- 3.4 Prohibition Against Contingent Fees.** Contractors wanting to do business with the CDA must not hire a person to solicit or secure a contract for a commission, percentage, brokerage, or contingent fee, except for bona fide established commercial selling agencies.

## 4.0 PROCUREMENT AUTHORITY AND ADMINISTRATION

- 4.1 Board of Commissioners.** This Procurement Policy has been adopted by the CDA Board of Commissioners and any substantive policy changes to this Policy must be approved by the Board. In adopting this Policy, the Board of Commissioners authorizes the Executive Director or their designee to approve and implement appropriate Procurement Procedures that are consistent with this Policy. The Board shall hold the Executive Director responsible for ensuring the appropriateness of any Procurement Procedures adopted.

- 4.2 Executive Director.** As the Contracting Officer for the CDA, the Executive Director is responsible for the management of all procurement for the CDA and shall hold Department Heads and other staff accountable for complying with these Policies and related Procurement Procedures to be adopted administratively by the Executive Director or their designee. The Executive Director shall ensure that all procurement activities of the CDA are consistent with the best interests of the CDA and applicable laws and regulations.

**4.2.1 Delegation.** The Executive Director may delegate in writing all procurement authority including contracting authority and expenditure authority as is considered necessary and appropriate to conduct the business of the CDA.

**4.2.2 Procurement Procedures.** Further, and in accordance with this delegation of authority, the Executive Director shall, where necessary, establish operational procedures (such as a procurement manual or standard operating procedures) to implement this Policy.

**4.2.3 Sanctions.** The Executive Director shall also establish a system of sanctions for violations of the ethical standards described in Section 3.0 herein, consistent with federal, state or local law.

- 4.3 Department Heads.** Department Heads are responsible for managing the procurement-related activities of their department and for ensuring compliance with these Policies and related Procurement Procedures

## 5.0 PROCUREMENT PLANNING

- 5.1 General.** Planning is essential to managing the procurement function properly. Hence, the CDA will periodically review its record of prior purchases, as well as future needs, to:

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- 5.1.1 Find patterns of procurement actions that could be performed more efficiently or economically;
- 5.1.2 Maximize competition and competitive pricing among contracts and decrease the CDA's procurement costs;
- 5.1.3 Reduce CDA administrative costs;
- 5.1.4 Ensure that supplies and services are obtained without any need for re-procurement (i.e., resolving bid protests); and
- 5.1.5 Minimize errors that occur when there is inadequate lead time.

Consideration shall be given to storage, security, and handling requirements when planning the most appropriate purchasing actions.

- 5.2 **Minnesota's Cooperative Purchasing Venture (CPV).** For each contract for the purchase of supplies, materials, or equipment over \$25,000, the CDA shall consider the availability, price and quality of supplies, materials, or equipment available through the CPV before purchasing through another source.

## 6.0 PROCUREMENT METHODS

- 6.1 **Petty Cash Purchases.** Purchases under \$100 may be handled through the use of a petty cash account. Petty Cash Accounts may be established in an amount sufficient to cover small purchases made during a reasonable period, e.g., one month. For all Petty Cash Accounts, the CDA shall ensure that security is maintained and only authorized individuals have access to the account. These accounts shall be reconciled and replenished periodically.
- 6.2 **Small Purchase Procedures.** For any amounts above the Petty Cash ceiling, but not exceeding \$100,000, the CDA may use small purchase procedures. Under small purchase procedures, the CDA shall obtain a reasonable number of quotes (preferably three); however, for purchases using federal funds that do not exceed \$3,000 (or \$2,000 in the case of acquisitions and construction subject to the Davis-Bacon Act), also known as Micro Purchases, only one quote is required provided the quote is considered reasonable. This Micro Purchase threshold is increased to purchases that do not exceed \$5,000 if the source of funds is non-Federal. To the greatest extent feasible, and to promote competition, small purchases should be distributed among qualified sources. Quotations for Small Purchases (QSP), or quotes, may be obtained orally (either in person or by phone), electronically, in writing, or through e-procurement. Award shall be made to the responsive and responsible vendor that submits the lowest cost to the CDA. If award is to be made for reasons other than lowest price, documentation shall be provided in the contract file. The CDA shall not break down requirements

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aggregating more than the small purchase threshold (or the Micro Purchase threshold) into several purchases that are less than the applicable threshold merely to: (1) permit use of the small purchase procedures or (2) avoid any requirements that applies to purchases that exceed the Micro Purchase threshold.

**6.3 Sealed Bids.** Sealed bidding, also known as Invitation for Bids (IFB), shall be used for all contracts that exceed the small purchase threshold and that are not competitive proposals or non-competitive proposals, as these terms are defined in this Policy. Under sealed bids, the CDA publicly solicits bids and awards a firm fixed-price contract (lump sum or unit price) to the responsive and responsible bidder whose bid, conforming with all the material terms and conditions of the IFB, is the lowest in price. Sealed bidding is the preferred method for procuring construction, supply, and non-complex service contracts that are expected to exceed \$100,000.

**6.3.1 Conditions for Using Sealed Bids.** The CDA shall use the sealed bid method if the following conditions are present: a complete, adequate, and realistic statement of work, specification, or purchase description is available; two or more responsible bidders are willing and able to compete effectively for the work; the contract can be awarded based on a firm fixed price; and the selection of the successful bidder can be made principally on the lowest price.

**6.3.2 Solicitation and Receipt of Bids.** An IFB is issued which includes the specifications and all contractual terms and conditions applicable to the procurement, and a statement that award will be made to the lowest responsible and responsive bidder whose bid meets the requirements of the solicitation. The IFB must state the time and place for both receiving the bids and the public bid opening. All bids received will be date and time-stamped and stored unopened in a secure place until the public bid opening. A bidder may withdraw the bid at any time prior to the bid opening.

**6.3.3 Bid Opening and Award.** Bids shall be opened publicly. All bids received shall be recorded on an abstract (tabulation) of bids, which shall then be made available for public inspection. If equal low bids are received from responsible bidders, selection shall be made by drawing lots or other similar random method. The method for doing this shall be stated in the IFB. If only one responsive bid is received from a responsible bidder, award shall not be made unless the price can be determined to be reasonable, based on a cost or price analysis.

**6.3.4 Mistakes in Bids.** Correction or withdrawal of bids may be permitted, where appropriate, before bid opening by written or electronic notice received in the office designated in the IFB prior to the time set for bid opening. After bid opening, corrections in bids may be permitted only if the bidder can show by clear and convincing evidence that a mistake

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of a nonjudgmental character was made, the nature of the mistake, and the bid price actually intended. A low bidder alleging a nonjudgmental mistake may be permitted to withdraw its bid if the mistake is clearly evident on the face of the bid document but the intended bid is unclear or the bidder submits convincing evidence that a mistake was made. All decisions to allow correction or withdrawal of a bid shall be supported by a written determination signed by the Contracting Officer. After bid opening, changes in bid prices or other provisions of bids prejudicial to the interest of the CDA or fair competition shall not be permitted.

**6.4 Competitive Proposals.** Unlike sealed bidding, the competitive proposal method, also known as Request For Proposals (RFP), permits: consideration of technical factors other than price; discussion with offerors concerning offers submitted; negotiation of contract price or estimated cost and other contract terms and conditions; revision of proposals before the final contractor selection; and the withdrawal of an offer at any time up until the point of award. Award is normally made on the basis of the proposal that represents the best overall value to the CDA, considering price and other factors, e.g., technical expertise, past experience, quality of proposed staffing, etc., set forth in the solicitation and not solely the lowest price.

**6.4.1 Conditions for Use.** Where conditions are not appropriate for the use of sealed bidding, competitive proposals may be used. Competitive proposals are the preferred method for procuring professional services that will exceed the small purchase threshold.

**6.4.2 Form of Solicitation.** Other than A/E services, developer-related services and energy performance contracting, competitive proposals shall be solicited through the issuance of an RFP. The RFP shall clearly identify the importance and relative value of each of the evaluation factors as well as any subfactors and price. A mechanism for fairly and thoroughly evaluating the technical and price proposals shall be established before the solicitation is issued. Proposals shall be handled so as to prevent disclosure of the number of offerors, identity of the offerors, and the contents of their proposals until after award. The CDA may assign price a specific weight in the evaluation factors or the CDA may consider price in conjunction with technical factors; in either case, the method for evaluating price shall be established in the RFP.

**6.4.3 Evaluation.** The proposals shall be evaluated only on the factors stated in the RFP. Where not apparent from the evaluation factors, the CDA shall establish an Evaluation Plan for each RFP. Generally, all RFPs shall be evaluated by an appropriately appointed Evaluation Committee. The Evaluation Committee shall be required to disclose any potential conflicts of interest and to sign a Non-Disclosure

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statement. An Evaluation Report, summarizing the results of the evaluation, shall be prepared prior to award of a contract.

**6.4.4 Negotiations.** Negotiations shall be conducted with all offerors who submit a proposal determined to have a reasonable chance of being selected for award, unless it is determined that negotiations are not needed with any of the offerors. This determination is based on the relative score of the proposals as they are evaluated and rated in accordance with the technical and price factors specified in the RFP. These offerors shall be treated fairly and equally with respect to any opportunity for negotiation and revision of their proposals. No offeror shall be given any information about any other offeror's proposal, and no offeror shall be assisted in bringing its proposal up to the level of any other proposal. A common deadline shall be established for receipt of proposal revisions based on negotiations. Negotiations are exchanges (in either competitive or sole source environment) between the CDA and offerors that are undertaken with the intent of allowing the offeror to revise its proposal. These negotiations may include bargaining. Bargaining includes persuasion, alteration of assumptions and positions, give-and-take, and may apply to price, schedule, technical requirements, type of contract or other terms of a proposed contract. When negotiations are conducted in a competitive acquisition, they take place after establishment of the competitive range and are called discussions. Discussions are tailored to each offeror's proposal, and shall be conducted by the contracting officer with each offeror within the competitive range. The primary object of discussions is to maximize the CDA's ability to obtain best value, based on the requirements and the evaluation factors set forth in the solicitation. The contracting officer shall indicate to, or discuss with, each offeror still being considered for award, significant weaknesses, deficiencies, and other aspects of its proposal (such as technical approach, past performance, and terms and conditions) that could, in the opinion of the contracting officer, be altered or explained to enhance materially the proposer's potential for award. The scope and extent of discussions are a matter of the contracting officer's judgment. The contracting officer may inform an offeror that its price is considered by the CDA to be too high, or too low, and reveal the results of the analysis supporting that conclusion. It is also permissible to indicate to all offerors the cost or price that the CDA's price analysis, market research, and other reviews have identified as reasonable. "Auctioning" (revealing one offeror's price in an attempt to get another offeror to lower their price) is prohibited.

**6.4.5 Award.** After evaluation of the revised proposals, if any, the contract shall be awarded to the responsible firm whose technical approach to the project, qualifications, price and/or any other factors considered,

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are most advantageous to the CDA provided that the price is within the maximum total project budgeted amount established.

**6.4.6 A/E Services.** The CDA shall contract for A/E services using Qualifications-based Selection (QBS) procedures, utilizing a Request For Qualifications (RFQ). Sealed bidding shall not be used for A/E solicitations. Under QBS procedures, competitors' qualifications are evaluated and the most qualified competitor is selected, subject to negotiation of fair and reasonable compensation. Price is not used as a selection factor under this method. QBS procedures shall not be used to purchase other types of services, other than Energy Performance Contracting and Developer services, though architectural/engineering firms are potential sources.

## **6.5 Noncompetitive Proposals.**

**6.5.1 Conditions for Use.** Procurement by noncompetitive proposals (sole- or single-source) may be used only when the award of a contract is not feasible using small purchase procedures, sealed bids, cooperative purchasing, or competitive proposals, and if one of the following applies:

**6.5.1.1** The item is available only from a single source, based on a good faith review of available sources;

**6.5.1.2** An emergency exists that seriously threatens the public health, welfare, or safety, or endangers property, or would otherwise cause serious injury to the CDA, as may arise by reason of a flood, earthquake, epidemic, riot, equipment failure, or similar event. In such cases, there must be an immediate and serious need for supplies, services, or construction such that the need cannot be met through any of the other procurement methods, and the emergency procurement shall be limited to those supplies, services, or construction necessary simply to meet the emergency;

**6.5.1.3** HUD authorizes the use of noncompetitive proposals; or

**6.5.1.4** After solicitation of a number of sources, competition is determined inadequate.

**6.5.1.5** Professional services may be procured by noncompetitive proposals if such method is not prohibited by applicable laws and regulations. All professional service contracts procured in this fashion shall be subject to review on an annual basis by the Executive Director.



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**6.5.2 Justification.** Each procurement based on noncompetitive proposals shall be supported by a written justification for the selection of this method. The justification shall be approved in writing by the responsible Contracting Officer. Poor planning or lack of planning is not justification for emergency or sole-source procurements. The justification, to be included in the procurement file, should include the following information:

- 6.5.2.1** Description of the requirement;
- 6.5.2.2** History of prior purchases and their nature (competitive vs. noncompetitive);
- 6.5.2.3** The specific exception in 2 CFR §200.320(g)(1)-(4) which applies;
- 6.5.2.4** Statement as to the unique circumstances that require award by noncompetitive proposals;
- 6.5.2.5** Description of the efforts made to find competitive sources (advertisement in trade journals or local publications, phone calls to local suppliers, issuance of a written solicitation, etc.);
- 6.5.2.6** Statement as to efforts that will be taken in the future to promote competition for the requirement;
- 6.5.2.7** Signature by the Contracting Officer's supervisor (or someone above the level of the Contracting Officer); and
- 6.5.2.8** Price Reasonableness. The reasonableness of the price for all procurements based on noncompetitive proposals shall be determined by performing an analysis, as described in this Policy.

**6.6 Cooperative Purchasing/Intergovernmental Agreements.** The CDA may enter into Federal, state and/or local cooperative or intergovernmental agreements to purchase or use common supplies, equipment, or services. The decision to use an interagency agreement instead of conducting a direct procurement shall be based on economy and efficiency. If used, the interagency agreement shall stipulate who is authorized to purchase on behalf of the participating parties and shall specify inspection, acceptance, termination, payment, and other relevant terms and conditions. The CDA may use Federal or state excess and surplus property instead of purchasing new equipment and property if feasible and if it will result in a reduction of project costs. The goods and services obtained under a cooperative purchasing agreement must have been procured in accordance with 2 CFR §200.317 through §200.326 and applicable state and local requirements. In



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evaluating the use of a cooperative or intergovernmental agreement, the Executive Director or their designee shall review for reasonableness, as appropriate, the standards used in the competitive selection process conducted by the other agency.

## 7.0 INDEPENDENT COST ESTIMATE (ICE)

**7.1 General.** For all purchases above the Micro Purchase threshold, the CDA shall prepare an ICE prior to solicitation. The level of detail shall be commensurate with the cost and complexity of the item to be purchased.

## 8.0 COST AND PRICE ANALYSIS (CPA)

**8.1 General.** The CDA shall require assurance that, before entering into a contract, the price is reasonable, in accordance with the following instructions.

**8.1.1 Petty Cash and Micro Purchases.** No formal cost or price analysis is required. Rather, the execution of a contract by the Contracting Officer (through a Purchase Order or other means) shall serve as the Contracting Officer's determination that the price obtained is reasonable, which may be based on the Contracting Officer's prior experience or other factors.

**8.1.2 Small Purchases.** A comparison with other offers shall generally be sufficient determination of the reasonableness of price and no further analysis is required. If a reasonable number of quotes are not obtained to establish reasonableness through price competition, the Contracting Officer shall document price reasonableness through other means, such as prior purchases of this nature, catalog prices, the Contracting Officer's personal knowledge at the time of purchase, comparison to the ICE, or any other reasonable basis.

**8.1.3 Sealed Bids.** The presence of adequate competition should generally be sufficient to establish price reasonableness. Where sufficient bids are not received, and when the bid received is substantially more than the ICE, and where the CDA cannot reasonably determine price reasonableness, the CDA must conduct a cost analysis, consistent with federal guidelines, to ensure that the price paid is reasonable.

**8.1.4 Competitive Proposals.** The presence of adequate competition should generally be sufficient to establish price reasonableness. Where sufficient proposals are not received, the CDA must compare the price with the ICE. For competitive proposals where prices cannot be easily compared among offerors, where there is not adequate competition, or where the price is substantially greater than the ICE, the CDA must

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conduct a cost analysis, consistent with Federal guidelines, to ensure that the price paid is reasonable.

- 8.1.5 Contract Modifications.** A cost analysis, consistent with federal guidelines, shall be conducted for all contract modifications for projects that were procured through Sealed Bids, Competitive Proposals, or Non-Competitive Proposals, or for projects originally procured through Small Purchase procedures and the amount of the contract modification will result in a total contract price in excess of \$100,000.

## 9.0 SOLICITATION AND ADVERTISING

### 9.1 Method of Solicitation.

- 9.1.1 Petty Cash and Micro Purchases.** The CDA may contact only one source if the price is considered reasonable.

- 9.1.2 Small Purchases.** Quotes may be solicited orally, electronically, E-Procurement, or by any other reasonable method.

- 9.1.3 Sealed Bids and Competitive Proposals.** Solicitation must be done publicly. The CDA must use one or more following solicitation methods, provided that the method employed provides for meaningful competition.

- 9.1.3.1** Advertising in newspapers or other print mediums of local or general circulations;

- 9.1.3.2** Advertising in various trade journals or publications (for construction);

- 9.1.3.3** E-Procurement. The CDA may conduct its public procurements through the Internet using e-procurement systems. However, all e-procurements must otherwise be in compliance with 2 CFR §200.317 through §200.326, state and local requirements and the CDA's procurement policy.

- 9.2 Time Frame.** For purchases of more than \$100,000, the public notice should run not less than once each week for two consecutive weeks.

- 9.3 Form.** Notices/advertisements should state, at a minimum, the place, date and time that the bids or proposals are due, the solicitation number, a contact that can provide a copy of, and information about, the solicitation, and a brief description of the needed items.

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**9.4 Time Period for Submission of Bids.** A minimum of 15 days shall generally be provided for preparation and submission of sealed bids and competitive proposals. However, the Executive Director may allow for a different time period if permissible by law and regulation.

**9.5 Cancellation of Solicitations.**

**9.5.1** An IFB, RFP, or other solicitation may be cancelled before bids/offers are due if:

**9.5.1.1** The supplies, services or construction is no longer required;

**9.5.1.2** The funds are no longer available;

**9.5.1.3** Proposed amendments to the solicitation are of such magnitude that a new solicitation would be best; or

**9.5.1.4** Other similar reasons.

**9.5.2** A solicitation may be cancelled and all bids or proposals that have already been received may be rejected if:

**9.5.2.1** The supplies or services (including construction) are no longer required;

**9.5.2.2** Ambiguous or otherwise inadequate specifications were part of the solicitation;

**9.5.2.3** All factors of significance to the CDA were not considered;

**9.5.2.4** Prices exceed available funds and it would not be appropriate to adjust quantities to come within available funds;

**9.5.2.5** There is reason to believe that bids or proposals may not have been independently determined in open competition, may have been collusive, or may have been submitted in bad faith; or

**9.5.2.6** For good cause of a similar nature when it is in the best interest of the CDA.

**9.5.3** The reasons for cancellation shall be documented in the procurement file and the reasons for cancellation and/or rejection shall be provided upon request.

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**9.5.4** A notice of cancellation shall be sent to all bidders/offerors solicited and, if appropriate, shall explain that they will be given an opportunity to compete on any re-solicitation or future procurement of similar items.

**9.5.5** If all otherwise acceptable bids received in response to an IFB are at unreasonable prices an analysis should be conducted to see if there is a problem in either the specifications or the CDA's cost estimate. If both are determined adequate and if only one bid is received and the price is unreasonable, the Contracting Officer may cancel the solicitation and either

**9.5.5.1** Re-solicit using an RFP; or

**9.5.5.2** Complete the procurement by using the competitive proposal method. The Contracting Officer must determine, in writing, that such action is appropriate, must inform all bidders of the CDA's intent to negotiate, and must give each bidder a reasonable opportunity to negotiate.

**9.5.6** If problems are found with the specifications, the CDA should cancel the solicitation, revise the specifications and re-solicit using an IFB.

**9.6 Credit (Purchasing) Cards.** Credit card usage should follow the rules for all other small purchases. For example, the Contracting Officer may use a credit card for Micro Purchases without obtaining additional quotes provided the price is considered reasonable. However, for amounts above the Micro Purchase level, the Contracting Officer would generally need to have obtained a reasonable number of quotes before purchasing via a credit card. When using credit cards, the CDA shall adopt reasonable safeguards to assure that they are used only for intended purposes (for instance, limiting the types of purchases or the amount of purchases that are permitted with credit cards).

## 10.0 BONDING REQUIREMENTS

**10.1 General.** The standards under this section apply to construction contracts that exceed \$100,000. There are no bonding requirements for small purchases or for competitive proposals. The CDA may require bonds in these latter circumstances when deemed appropriate; however, non-construction contracts should generally not require bid bonds.

**10.1.1 Bid Bonds.** For construction contracts exceeding \$100,000, offerors shall be required to submit a bid guarantee from each bidder equivalent to 5% of the bid price.

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**10.1.2 Payment Bonds.** For construction contracts exceeding \$100,000, the successful bidder shall furnish an assurance of completion. This assurance may be any one of the following four:

**10.1.2.1** A performance and payment bond in a penal sum of 100% of the contract price; or (in the case of contracts funded by HUD)

**10.1.2.2** Separate performance and payment bonds, each for 50% or more of the contract price; or

**10.1.2.3** A 20 % cash escrow; or

**10.1.2.4** A 25 % irrevocable letter of credit.

These bonds must be obtained from guarantee or surety companies acceptable to the U. S. Government and authorized to do business in the State of Minnesota. Individual sureties shall not be considered. U. S. Treasury Circular Number 570 lists companies approved to act as sureties on bonds securing Government contracts, the maximum underwriting limits on each contract bonded, and the states in which the company is licensed to do business. Use of companies on this circular is mandatory.

## 11.0 CONTRACTOR QUALIFICATIONS AND DUTIES

### 11.1 Contractor Responsibility

**11.1.1** The CDA shall not award any contract until the prospective contractor, i.e., low responsive bidder, or successful offeror, has been determined to be responsible. A responsible bidder/offeror must:

**11.1.1.1** Have adequate financial resources to perform the contract, or the ability to obtain them;

**11.1.1.2** Be able to comply with the required or proposed delivery or performance schedule, taking into consideration all of the bidder's/offeror's existing commercial and governmental business commitments;

**11.1.1.3** Have a satisfactory performance record;

**11.1.1.4** Have a satisfactory record of integrity and business ethics;

**11.1.1.5** Have the necessary organization, experience, accounting and operational controls, and technical skills, or the ability to obtain them;

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**11.1.1.6** Have the necessary production, construction, and technical equipment and facilities, or the ability to obtain them; and,

**11.1.1.3** Be otherwise qualified and eligible to receive an award under applicable laws and regulations, including not be suspended, debarred or under HUD-imposed LDP.

**11.1.2** If a prospective contractor is found to be non-responsible, a written determination of non-responsibility shall be prepared and included in the official contract file, and the prospective contractor shall be advised of the reasons for the determination.

**11.2 Suspension and Debarment.** Contracts shall not be awarded to debarred, suspended, or ineligible contractors. Contractors may be suspended, debarred, or determined to be ineligible by HUD in accordance with HUD regulations (24 CFR Part 24) or by other Federal agencies, e.g., Department of Labor for violation of labor regulations, when necessary to protect housing authorities in their business dealings. Prior to issuance of a contract, HA staff shall, as detailed within Section 10.2.H.1 and 10.2.H.2 of HUD Procurement Handbook 7460.8 REV 2, conduct the required searches within the HUD Limited Denial of Participation (LDP) system and the U.S. General Services Administration (GSA) Excluded Parties Listing Service system and place within the applicable contract file a printed copy of the results of each such search.

**11.3 Vendor Lists.** All interested businesses shall be given the opportunity to be included on vendor mailing lists. Any lists of persons, firms, or products which are used in the purchase of supplies and services (including construction) shall be kept current and include enough sources to ensure competition.

## 12.0 CONTRACT PRICING ARRANGEMENTS

**12.1 Contract Types.** Any type of contract which is appropriate to the procurement and which will promote the best interests of the CDA may be used, **provided the cost -plus-a-percentage-of-cost and percentage-of-construction-cost methods are not used.** All solicitations and contracts shall include the clauses and provisions necessary to define the rights and responsibilities of both the contractor and the CDA. For all cost reimbursement contracts, the CDA must include a written determination as to why no other contract type is suitable. Further, the contract must include a ceiling price that the contractor exceeds at its own risk.

**12.2 Options.** Options for additional quantities or performance periods may be included in contracts, provided that:

**12.2.1** The option is contained in the solicitation;

**12.2.2** The option is a unilateral right of the CDA;

## PROCUREMENT POLICY

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- 12.2.3 The contract states a limit on the additional quantities and the overall term of the contract;
- 12.2.4 The options are evaluated as part of the initial competition;
- 12.2.5 The contract states the period within which the options may be exercised;
- 12.2.6 The options may be exercised only at the price specified in or reasonably determinable from the contract; and
- 12.2.7 The options may be exercised only if determined to be more advantageous to the CDA than conducting a new procurement.

### 13.0 CONTRACT CLAUSES

- 13.1 **Contract Pricing Arrangements.** All contracts shall identify the contract pricing arrangement as well as other pertinent terms and conditions, as determined by the CDA.
- 13.2 **Required Forms.** Additionally, the forms HUD-5369, 5369-A, 5369-B, 5369, 5370, 5370-C, and 51915-A, which contain all HUD-required clauses and certifications for contracts of more than \$100,000, as well as any forms/clauses as required by HUD for small purchases, shall be used in all corresponding solicitations and contracts issued by the CDA.
- 13.3 **Required Contract Clauses:** The CDA shall ensure that each contract executed by the CDA contains the required contract clauses described in Appendix II to 2 CFR Part 200 – Contract Provisions for non-Federal Entity Contracts Under Federal Awards.

### 14.0 CONTRACT ADMINISTRATION

- 14.1 **General.** The CDA shall maintain a system of contract administration designed to ensure that Contractors perform in accordance with their contracts. These systems shall provide for inspection of supplies, services, or construction, as well as monitoring contractor performance, status reporting on major projects including construction contracts, and similar matters. For cost-reimbursement contracts, costs are allowable only to the extent that they are consistent with the cost principles in HUD Handbook 2210.18.

### 15.0 SPECIFICATIONS

- 15.1 **General.** All specifications shall be drafted so as to promote overall economy for the purpose intended and to encourage competition in satisfying the CDA's needs. Specifications shall be reviewed prior to issuing any solicitation to ensure

## PROCUREMENT POLICY

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that they are not unduly restrictive or represent unnecessary or duplicative items. Function or performance specifications are preferred. Detailed product specifications shall be avoided whenever possible. Consideration shall be given to consolidating or breaking out procurements to obtain a more economical purchase. For equipment purchases, a lease versus purchase analysis should be performed to determine the most economical form of procurement.

**15.2 Limitation.** The following types of specifications shall be avoided:

**15.2.1** Geographic restrictions not mandated or encouraged by applicable Federal law (except for A/E contracts, which may include geographic location as a selection factor if adequate competition is available);

**15.2.2** Brand name specifications (unless the specifications list the minimum essential characteristics and standards to which the item must conform to satisfy its intended use).

Nothing in this procurement policy shall preempt any state licensing laws. Specifications shall be reviewed to ensure that organizational conflicts of interest do not occur (for example, having a consultant perform a study of the CDA's computer needs and then allowing that consultant to compete for the subsequent contract for the computers).

## 16.0 APPEALS AND REMEDIES

**16.1 General.** It is CDA policy to resolve all contractual issues informally and without litigation. Disputes will not be referred to HUD unless all administrative remedies have been exhausted. When appropriate, a mediator may be used to help resolve differences.

**16.2 Informal Appeals Procedure.** The CDA shall adopt an informal bid protest/appeal procedure for contracts of \$100,000 or less. Under these procedures, the bidder/contractor may request to meet with the appropriate Contract Officer.

**16.3 Formal Appeals Procedure.** A formal appeals procedure shall be established for solicitations/contracts of more than \$100,000.

**16.3.1 Bid Protest.** Any actual or prospective contractor may protest the solicitation or award of a contract for serious violations of the principles of this Policy. Any protest against a solicitation must be received before the due date for the receipt of bids or proposals, and any protest against the award of a contract must be received within ten (10) calendar days after the contract receives notice of the contract award, or the protest will not be considered. All bid protests shall be in writing, submitted to the Contracting Officer or designee, who shall issue a written decision on the matter. The Contracting Officer may, at



## PROCUREMENT POLICY

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his/her discretion, suspend the procurement pending resolution of the protest if the facts presented so warrant.

- 16.3.2 Contractor Claims.** All claims by a contractor relating to performance of a contract shall be submitted in writing to the Contracting Officer for a written decision. The contractor may request a conference on the claim. The Contracting Officer's decision shall inform the contractor of its appeal rights to the next higher level of authority in CDA. Contractor claims shall be governed by the Changes clause in the form HUD-5370.

### 17.0 ASSISTANCE TO SMALL AND OTHER BUSINESSES

- 17.1 Required Efforts.** Consistent with Presidential Executive Orders 11625, 12138, and 12432, and Section 3 of the HUD Act of 1968, all feasible efforts shall be made to ensure that small and minority-owned businesses, women's business enterprises, and other individuals or firms located in or owned in substantial part by persons residing in the area of the CDA project are used when possible. Such efforts shall include, but shall not be limited to:
- 17.1.1** Including such firms, when qualified, on solicitation mailing lists;
  - 17.1.2** Encouraging their participation through direct solicitation of bids or proposals whenever they are potential sources;
  - 17.1.3** Dividing total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by such firms;
  - 17.1.4** Establishing delivery schedules, where the requirement permits, which encourage participation by such firms;
  - 17.1.5** Using the services and assistance of the Small Business Administration, and the Minority Business Development Agency of the Department of Commerce;
  - 17.1.6** Including in contracts, to the greatest extent feasible, a clause requiring contractors, to provide opportunities for training and employment for lower income residents of the project area and to award subcontracts for work in connection with the project to business concerns which provide opportunities to low-income residents, as described in 24 CFR Part 135 (so-called Section 3 businesses); and
  - 17.1.7** Requiring prime contractors, when subcontracting is anticipated, to take the positive steps listed above.
- 17.2 Goals.** May be established periodically for participation by small businesses, minority-owned businesses, women-owned business enterprises, labor surplus

## PROCUREMENT POLICY

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area businesses, and Section 3 business concerns in CDA prime contracts and subcontracting opportunities.

### **17.3 Definitions.**

**17.3.1** A small business is defined as a business that is: independently owned; not dominant in its field of operation; and not an affiliate or subsidiary of a business dominant in its field of operation. The size standards in 13 CFR Part 121 should be used to determine business size.

**17.3.2** A minority-owned business is defined as a business which is at least 51% owned by one or more minority group members; or, in the case of a publicly-owned business, one in which at least 51% of its voting stock is owned by one or more minority group members, and whose management and daily business operations are controlled by one or more such individuals. Minority group members include, but are not limited to Black Americans, Hispanic Americans, Native Americans, Asian Pacific Americans, Asian Indian Americans, and Hasidic Jewish Americans.

**17.3.3** A women's business enterprise is defined as a business that is at least 51% owned by a woman or women who are U.S. citizens and who control and operate the business.

**17.3.4** A "Section 3 business concern" is as defined under 24 CFR Part 135.

**17.3.5** A labor surplus area business is defined as a business which, together with its immediate subcontractors, will incur more than 50% of the cost of performing the contract in an area of concentrated unemployment or underemployment, as defined by the DOL in 20 CFR Part 654, Subpart A, and in the list of labor surplus areas published by the Employment and Training Administration.

## **18.0 BOARD APPROVAL OF PROCUREMENT ACTIONS**

**18.1 Authority.** The Board appoints and delegates procurement authority to the Executive Director (ED) in the amount not to exceed \$100,000 and is responsible for ensuring that any procurement policies and procedures adopted are appropriate for the CDA. All procurements that exceed \$100,000 must have approval from the Board prior to award and/or contract execution.

# PROCUREMENT POLICY

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## 19.0 DOCUMENTATION

**19.1 Required Records.** The CDA must maintain records sufficient to detail the significant history of each procurement action. These records shall include, but shall not necessarily be limited to, the following:

**19.1.1** Rationale for the method of procurement (if not self-evident);

**19.1.2** Rationale of contract pricing arrangement (also if not self-evident);

**19.1.3** Reason for accepting or rejecting the bids or offers;

**19.1.4** Basis for the contract price;

**19.1.5** A copy of the contract documents awarded or issued and signed by the Contracting Officer;

**19.1.6** Basis for contract modifications; and

**19.1.7** Related contract administration actions.

**19.2 Level of Documentation.** The level of documentation should be commensurate with the value of the procurement.

**19.3 Record Retention.** Records are to be retained as specified in the CDA's Record Retention Policies.

## 20.0 DISPOSITION OF SURPLUS PROPERTY

**20.1 General.** Property no longer necessary for the CDA's purposes (non-real property) shall be transferred, sold, or disposed of in accordance with applicable federal, state, and local laws and regulations.

## 21.0 FUNDING AVAILABILITY

**21.1 General.** Before initiating any contract, the CDA shall ensure that there are sufficient funds available to cover the anticipated cost of the contract or modification.

## 22.0 SELF-CERTIFICATION

**22.1 Statement.** The CDA self-certifies that this Policy, and the CDA's procurement system, complies with all applicable federal regulations, and as such, the CDA is exempt from prior HUD review and approval of individual procurement actions.

# LIMITED ENGLISH PROFICIENCY (LEP) POLICY

**Adopted July, 2007**

**For more information, contact:**  
Dakota County CDA  
1228 Town Centre Drive  
Eagan, MN 55123  
tel. 651-675-4400 • fax 651-675-4444

## **Section One--Plan Purpose**

The Dakota County CDA Limited English Proficiency (LEP) Plan sets forth the policy for ensuring meaningful access by limited English proficient persons to programs and services provided by the CDA.

The Plan has been developed in accordance with Executive Order 13166 and guidance provided by the Department of Housing and Urban Development. The CDA will make reasonable efforts to provide or arrange free language assistance for LEP clients. This includes applicants, recipients and/or persons eligible for CDA programs.

## **Section Two—Definitions**

Limited English Proficient (LEP): Persons who do not speak English as their primary language and who have a limited ability to read, write, speak or understand English can be LEP, and may be entitled to language assistance with respect to a particular service, benefit, or encounter.

Interpretation: The act of listening to something in one language (source language) and orally translating it into another language (target language).

Translation: Is the replacement of written text from one language (source language) into an equivalent written text in another language (target language)

Meaningful Access: Meaningful access to programs and services is the standard of access required of federally funded entities to comply with Title VI's language access requirements. To ensure meaningful access for people with limited English proficiency, service providers must make available to applicants/recipients free language assistance that result in accurate and effective communication.

## **Section Three—Four Factor Analysis**

In taking reasonable steps to ensure meaningful access to programs and services by LEP persons, the CDA shall determine need within its service jurisdiction by balancing the following four factors:

- The number or proportion of LEP persons eligible to be served or likely to be encountered by the CDA.
- The frequency with which the CDA comes in contact with a particular language.
- The nature and importance of the program, activity or service to the person's life.
- The CDA's resources and the cost of providing meaningful access. Reasonable steps may cease to be reasonable when the costs imposed substantially exceed the benefits.

In analyzing the eligible market area and program beneficiaries by using the four factors, the CDA may conclude that different language assistance measures are sufficient for

different types of programs and/or activities. Measures employed will be based on what is considered necessary and reasonable.

#### **Section Four—Language Assistance**

CDA staff will take reasonable steps to provide the opportunity for meaningful access by LEP clients who have difficulty communicating in English. The CDA has the discretion to determine whether language assistance is needed, and if so, the type of assistance necessary to provide meaningful access.

The Agency has identified two methods of providing meaningful access:

##### **Interpreter Services**

Oral interpretation services may be provided through the use of informal and formal interpreters including bilingual staff, telephone interpretation services, contracted in-person interpreters, and informal interpreter networks.

Informal: Depending on the circumstances, timing and subject matter the use of informal interpreters may be appropriate. Examples of informal interpreters include the LEP client's family members, friends, or advocates. CDA employees should be aware that staff should never require, suggest, or encourage a LEP client to use family members or friends as interpreters. However, a LEP person may use an informal interpreter of their own choosing and expense in place of or as a supplement to the free language assistance offered by the CDA. Due to issues of confidentiality and competency, informal interpreters must be over the age of 18. Further, the CDA may also have a formal interpreter present, even if the LEP person has requested use of an informal interpreter.

Formal: Formal interpreters may include contract vendors and CDA staff. The CDA shall maintain contracts with professional interpreting services and determine, based on client need, the best source for such services. This service shall be free to clients. Contract interpretation services include:

State of Minnesota: Under State of Minnesota Cooperative Purchasing Venture (CPV) guidelines, the CDA has access to statewide master contracts with qualified vendors of spoken language interpreter services.

Dakota County Community Services: Dakota County Community Services has developed contracts with agencies to provide oral interpretation, written translation and American Sign Language to assist with clients who have limited English proficiency.

Dakota County CDA Listing: The CDA has developed a list of commonly used interpreters.

Competency of Interpreters: To provide effective services to LEP persons, the CDA will use competent interpreters. Competency to interpret does not necessarily mean formal certification as an interpreter but competency requires that interpreters:

- Demonstrate proficiency in and ability to communicate information accurately in both English and in the other language and identify and use the appropriate mode of interpreting.
- Have fundamental knowledge in both languages of any specialized terms or concepts.
- Understand and adhere to their role as interpreters without deviating into a role outside of interpreting such as counselor or legal advisor.
- Demonstrate a solid understanding and compliance with MN Data Privacy laws

Means of providing: If a client asks for or indicates otherwise a need for language assistance, the CDA will determine whether or not the client is LEP and that language assistance is necessary to provide meaningful access. Interpretation that is needed and reasonable shall be provided at a time and place that avoids the effective denial of the service or benefit.

Documentation of Use: CDA staff shall document in the client's case file or record when an interpreter is used or when a client makes use of another form of language assistance.

If the client has been offered free interpretive services and chooses to utilize their own interpreter, the client must sign a waiver indicating that they are giving up their right to free interpreter services. The waiver will be in effect for the time period indicated on the form.

### **Translation Services**

The CDA will weigh the costs and benefits of translating documents for LEP groups, considering the expense of translating the documents, the barriers to meaningful translation of technical housing information, the likelihood of frequent changes in documents, the existence of multiple dialects within a single language group, the literacy rate of an LEP group and other relevant factors. The CDA will undertake the examination when an eligible LEP group constitutes 5 percent of an eligible client group or 1,000 persons, whichever is less.

As opportunities arise, the CDA may work with other housing authorities to share the costs of translating common documents.

## **Section Five—Notification**

### **Client Notification**

The CDA will provide notification of free language services by providing notice in appropriate languages explaining how LEP persons can receive assistance. Examples of client notification may include:

- Use of the Minnesota Department of Human Services Language Block (#1) at initial points of contact such as the CDA's main lobby, briefing room and other key office locations such as cubicles where client meetings occur.

- Use of the Minnesota Department of Human Services Language Block (#4) in documents such as letters and applications.

### **Staff Notification**

The CDA will provide notification to staff regarding the obligation to provide meaningful access to information and services for LEP persons. Examples of staff notification may include:

- Explanation of requirements at new employee orientation.
- Training sessions for supervisors and other staff who need to communicate with LEP clients regarding the LEP plan details and the requirement to offer free language assistance.

### **Section Seven—Evaluation and Monitoring**

From time to time, the CDA will review the LEP Policy to determine its overall effectiveness. The review may consider the following areas:

- Changes in the current LEP populations;
- Changes in the frequency of encounters with LEP language groups;
- The nature and importance of agency activities to LEP persons;
- The availability of resources including technological advances, additional resources, and costs imposed;
- Whether existing assistance is meeting the needs of LEP persons;
- Whether staff knows and understands the LEP plan;
- Whether identified sources for assistance are still available and viable.



**MEMORANDUM**

**TO:** Steve Mielke and Jay Stassen  
**FROM:** Maggie Dykes, Community & Economic Development Asst. Director  
**DATE:** May 3, 2016  
**RE:** **CDBG, HOME, and ESG Certifications**

I am providing you responses from the CDA regarding the following certifications that are identified as part of CDBG and HOME funding from the U.S. Department of Housing and Urban Development (HUD).

**1. Affirmatively Further Fair Housing.** Dakota County complies with the Fair Housing Act and other civil rights laws, including Title VI of the Civil Rights Act of 1964, Section 109 of the Housing and Community Development Act of 1974, Section 504 of the Rehabilitation Act of 1973, and Title II of the Americans with Disabilities Act of 1990. To promote compliance with these fair housing related acts and laws Dakota County participates in the Fair Housing Implementation Council (FHIC). The FHIC is a collaborative group representing the Twin Cities metropolitan area entitlement jurisdictions and other governmental agencies. The purpose of the FHIC is to facilitate and initiate implementation of affirmative activities having metro-wide significance identified in regional analyses of impediments to fair housing choice (AI).

In 2014, the FHIC contracted with HousingLink to author an AI for 2015-2019. HUD staff reviewed the AI and determined amendments needed to be made to address certain deficiencies before the document would be approved by HUD. In October 2015, HUD's Region V Fair Housing and Equal Opportunity (FHEO) office asked the FHIC to pause with the process connected to the amendment of the AI. Subsequently, Region V FHEO Director Maury McGough developed a "road map to revise Analysis of Impediments" dated February 26, 2016 that anticipates the AI being successfully amended not later than April 15, 2017.

Attached to this memo is a letter from Region V FHEO Director Maury McGough explaining the current process and the proposed road map to revise the AI. Director McGough requests the County Board Chair's signature on the proposed road map to pledge the County's participation in the process.

**2. Anti-displacement and Relocation Plan.** A copy of the 2016 Dakota County Residential Anti-displacement and Relocation Assistance Plan has been completed by the CDA and is included as Attachment D in the County RBA.

**3. Drug Free Workplace.** The CDA includes this provision in its Personnel Policies & Procedures Manual with corresponding programs.



4. **Anti-Lobbying.** The CDA is not aware of any lobbying that meets definitions listed as #1 and #2 in the attached Certifications document. Furthermore, these provisions are included in award documents and contracts.
5. **Consistency with Plan.** All housing and community development activities undertaken with CDBG and HOME funds are consistent with the Consolidated Plan for Dakota County, 2015-2019.
6. **Section 3.** On behalf of Dakota County, the CDA complies with Section 3 of the Housing and Urban Development Act of 1968 related to employment and training opportunities for low income persons. The CDA submits an annual report to HUD with required information on contracts over \$100,000.
7. **Citizen Participation.** A copy of the 2016 Citizen Participation Plan for the Dakota County Consortium is included as Attachment E.
8. **Community Development Plan.** The 2015-2019 Consolidated Plan for Dakota County identifies needs and specifies objectives as required.
9. **Following the Plan.** The Dakota County Board approved the 2015-2019 Consolidated Plan for Dakota County on May 5, 2015 (Res.15-225).
10. **Use of Funds.** On behalf of Dakota County, the CDA makes sure that the use of CDBG funds complies with priorities identified in the Annual Action Plan, overall benefit criteria, and special assessment provisions.
11. **Compliance with Anti-Discrimination Laws.** CDBG and HOME grant funds are administered in compliance with Title VI of the Civil Rights Act of 1964.
12. **Lead-based Paint.** On behalf of Dakota County, the CDA administers all CDBG and HOME-funded programs in compliance with Part 35, Subparts A, B, J, K and R of Title 24.
13. **Compliance with Laws.** On behalf of Dakota County, the CDA is in compliance with all applicable laws.
14. **Specific HOME Certification.** On behalf of Dakota County, the CDA certifies compliance with: (a) tenant based rental assistance; (b) eligible activities and costs; and (c) appropriate financial assistance as listed in the Specific HOME Certifications document.
15. **Specific ESG Certifications.** On behalf of Dakota County, the CDA certifies compliance with the items listed in the ESG Certifications document.



**SPECIFIC CDBG CERTIFICATIONS**

The Entitlement Community certifies that:

**Citizen Participation** – It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

**Community Development Plan** – Its consolidated housing and community development plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that provide decent housing, expand economic opportunities primarily for persons of low and moderate income. (See CFR 24 570.2 and CFR 24 Part 570)

**Following a Plan** – It is following a current consolidated plan (or Comprehensive Housing Affordability Strategy) that has been approved by HUD.

**Use of Funds** – It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it certifies that it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low and moderate income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available;
2. Overall Benefit. The aggregate use of CDBG funds including section 108 guaranteed loans during program year(s) 2016 (a period specified by the grantee consisting of one, two or three specific consecutive program years), shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period;
3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds including Section 108 loan guaranteed funds by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108, unless CDBG funds are used to pay the proportion of fee or assessment attributable to the capital costs of public improvements financed from other revenue sources. In this case, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. Also, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

**Excessive Force** – It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.



**CERTIFICATIONS**

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

**Affirmatively Further Fair Housing** – The jurisdiction will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

**Anti-displacement and Relocation Plan** – It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential anti-displacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

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

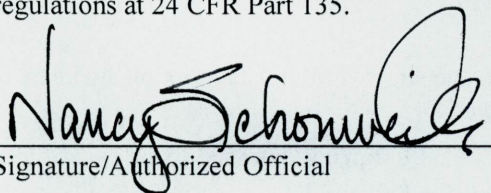
1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the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

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

**Consistency with Plan** – The housing activities to be undertaken with CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan.

**Acquisition and Relocation** – It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 24.

**Section 3** – It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.

  
\_\_\_\_\_  
Signature/Authorized Official

5-6-16  
\_\_\_\_\_  
Date

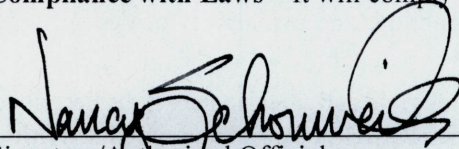
Nancy Schouweiler, Chair, Dakota County Board of Commissioners  
Print Name/Title



**Compliance with Anti-discrimination Laws** – The grant will be conducted and administered in conformity with Title VI of the Civil Rights Act of 1964 (42 USC 2000d), the Fair Housing Act (42 USC 3601-3619), and implementing regulations.

**Lead-Based Paint** – Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, subparts A, B, J, K, and R.

**Compliance with Laws** – It will comply with applicable laws.

  
\_\_\_\_\_  
Signature/Authorized Official

5-6-16  
Date

Nancy Schouweiler, Chair, Dakota County Board of Commissioners  
Print Name/Title

**SPECIFIC HOME CERTIFICATIONS**

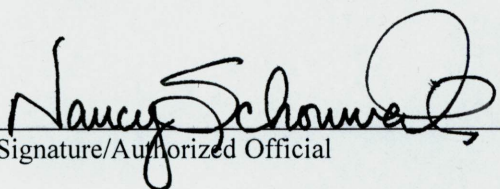
The HOME participating jurisdiction certifies that:

**Tenant Based Rental Assistance** – If the participating jurisdiction intends to provide tenant-based rental assistance:

The use of HOME funds, for tenant-based rental assistance is an essential element of the participating jurisdiction’s consolidated plan for expanding the supply, affordability, and availability of decent, safe, sanitary, and affordable housing.

**Eligible Activities and Costs** – It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR 92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in 24 CFR 92.214.

**Appropriate Financial Assistance** – Before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing.

  
Signature/Authorized Official

5-6-16  
Date

Nancy Schouweiler, Chair, Dakota County Board of Commissioners  
Print Name/Title



**ESG CERTIFICATIONS**

The Emergency Solutions Grants Program Recipient certifies that:

**Major rehabilitation/conversion** – If an emergency shelter’s rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the jurisdiction will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation. If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the jurisdiction will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion. In all other cases where ESG funds are used for renovation, the jurisdiction will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

**Essential Services and Operating Costs** – In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the jurisdiction will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the jurisdiction serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

**Renovation** – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

**Supportive Services** – The jurisdiction will assist homeless individuals in obtaining permanent housing, appropriate supportive services ( including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal State, local, and private assistance available for such individuals.

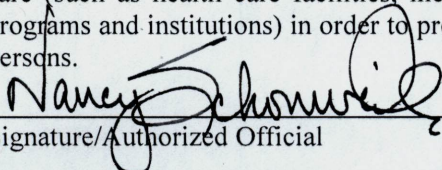
**Matching Funds** – The jurisdiction will obtain matching amounts required under 24 CFR 576.201.

**Confidentiality** – The jurisdiction has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

**Homeless Persons Involvement** – To the maximum extent practicable, the jurisdiction will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

**Consolidated Plan** – All activities the jurisdiction undertakes with assistance under ESG are consistent with the jurisdiction’s consolidated plan.

**Discharge Policy** – The jurisdiction will establish and implement, to the maximum extent practicable and where appropriate policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

  
\_\_\_\_\_  
Signature/Authorized Official

5-6-16  
\_\_\_\_\_  
Date

Nancy Schouweiler, Chair, Dakota County Board of Commissioners  
Print Name/Title









# Memorandum

**TO:** Erin Stwora, Assistant Director  
Dakota County Physical Development

**FROM:** Timothy J. Leslie, Dakota County Sheriff *TJL*

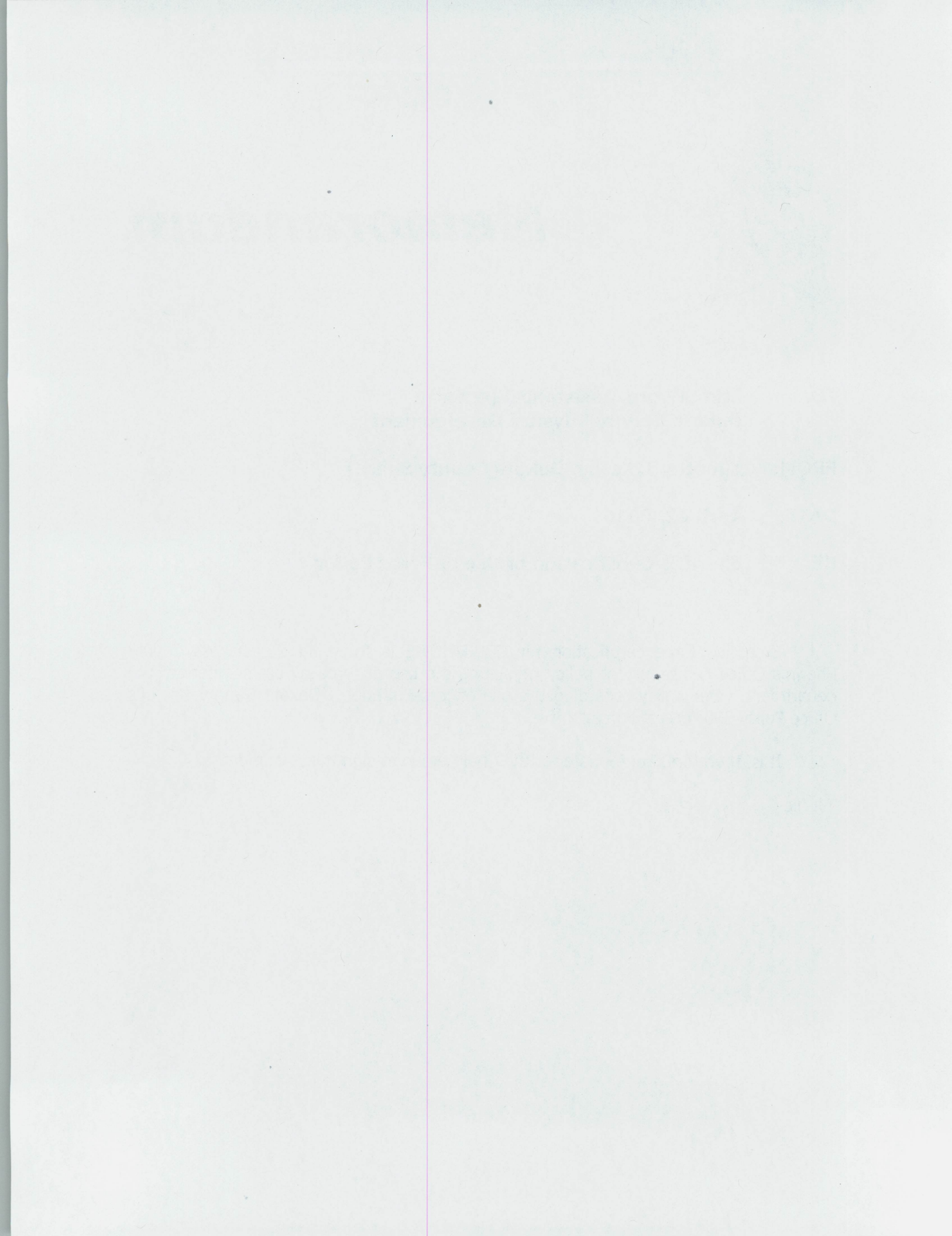
**DATE:** April 12, 2016

**RE:** Sheriff's Certification of Use of Force Policy

Excessive force certification for CDBG/HOME is true and the Dakota County Sheriff's Office has a current policy regulating the use of force by all members of the department. Our policy regarding the use of force is titled, "Dakota County Sheriff's Office Policy 300, Use of Force."

It is, therefore, appropriate for the Chairperson to sign this document.

TJL/jle



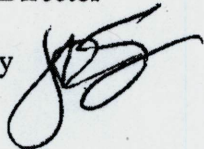


**MEMORANDUM**

**DAKOTA COUNTY ATTORNEY'S OFFICE  
JAMES C. BACKSTROM  
COUNTY ATTORNEY**

**CIVIL DIVISION**

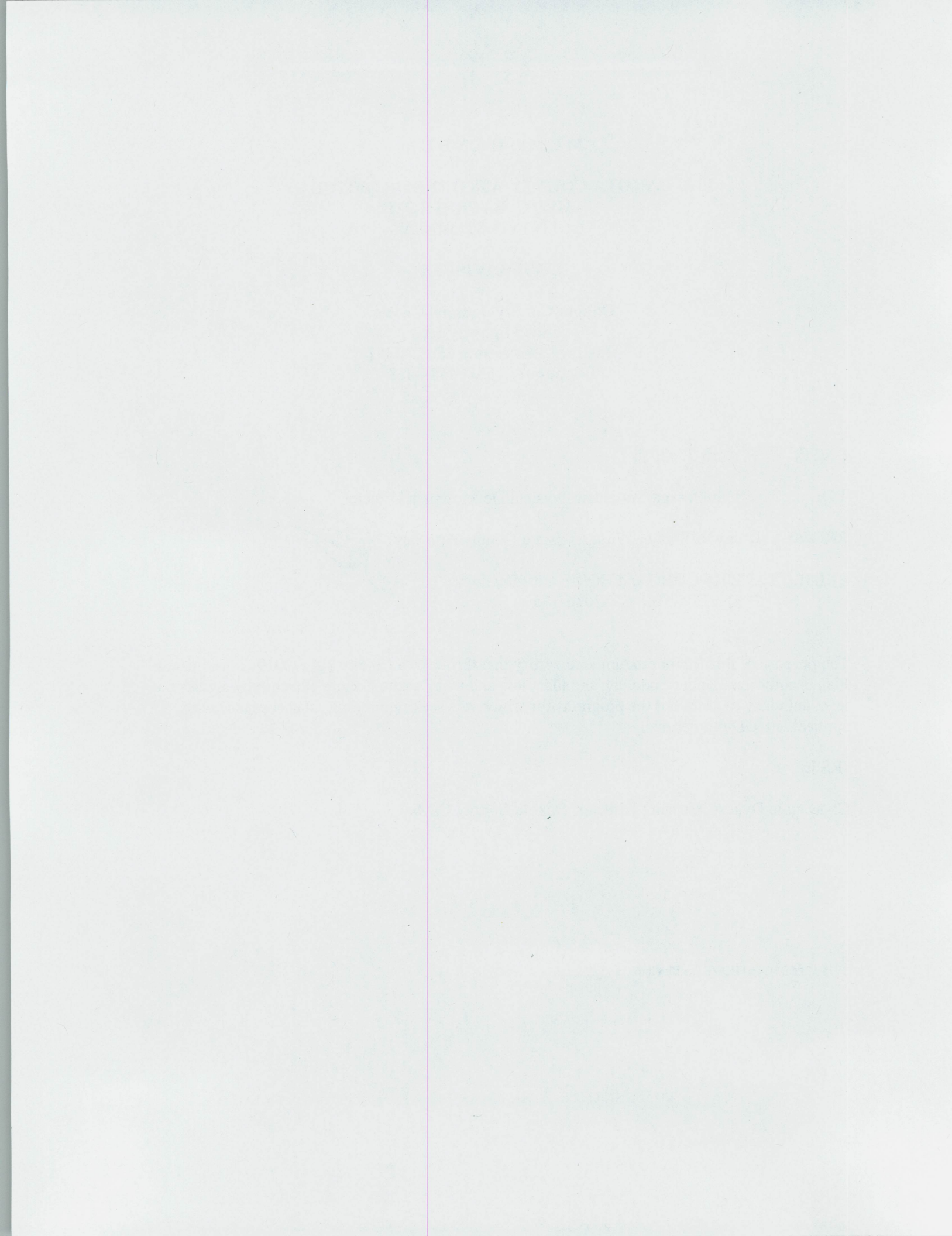
**Dakota County Judicial Center  
1560 Highway 55  
Hastings, Minnesota 55033-2392  
Telephone: (651) 438-4438**

**DATE:** April 25, 2016  
**TO:** Erin Stwora, Assistant Physical Development Director  
**FROM:** Jay R. Stassen, First Assistant County Attorney   
**SUBJECT:** 2016 CDBG and HOME Certifications  
Our File No.: CV-2016-175

The purpose of this Memorandum is to certify that the Dakota County 2015-2019 Consolidated Plan is authorized under State law and local law and that Dakota County currently possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

JRS:jr

C: Maggie Dykes, Assistant Director, Dakota County CDA







U. S. DEPARTMENT OF HOUSING AND URBAN  
DEVELOPMENT

FHEO Region V  
Ralph H. Metcalfe Federal Building  
77 West Jackson Boulevard – Room 2101  
Chicago, Illinois 60604-3507

**Office of Fair Housing and Equal Opportunity**

February 26, 2016  
Mr. Karl Batalden  
Housing and Economic Development Coordinator  
8301 Valley Creek Road  
Woodbury, Minnesota 55125

Dear Mr. Batalden:

This letter is in reference to discussions our offices have had about potential revisions to the 2014 Minneapolis-St. Paul regional analysis of impediments (herein, "AI") prepared by the Fair Housing Implementation Council (FHIC) on behalf of 13 entitlement communities – Anoka County, Dakota County, Hennepin County, Ramsey County, Washington County, the City of Bloomington, the City of Coon Rapids, the City of Eden Prairie, the City of Minneapolis, the City of Minnetonka, the City of Plymouth, the City of St. Paul, and the City of Woodbury – in the Twin Cities metro area. We greatly appreciate your dedication to enhancing the AI and developing innovative strategies to affirmatively further fair housing in the region.

In a conversation with the Department, members of the FHIC acknowledged potential concerns regarding their AI, including the need to adequately analyze pertinent issues relating to residential racial segregation. I was pleased that members of the FHIC expressed their willingness to collaboratively revise the AI to address these concerns.

The Department believes that this collaborative effort presents a valuable opportunity for the Twin Cities region to utilize the tools offered under the Department's new Affirmatively Furthering Fair Housing rule to revise and improve the AI. I am optimistic that a broad regional fair housing planning process, supported by cutting-edge analytical tools and informed by meaningful community outreach and participation, will result in an AI that addresses fair housing issues and sets constructive goals for the Minneapolis-St. Paul region.

Toward this end, in lieu of a 2016 revision to the current AI to support your jurisdictions' certifications to affirmatively further fair housing, the Department will accept your jurisdictions' assurances that you will revise the AI by no later than April 15, 2017, and in accordance with the Road Map set forth below. Upon receipt of such assurances, the Department will defer its review of your AI for a year in view of our mutual expectation that, subject to delays beyond your control, you will submit a revised AI before April 15, 2017.



## Road Map to Revise Analysis of Impediments

Agreement by members of the FHIC to the following principles for revising the AI will assure the Department of the members' commitment to affirmatively further fair housing:

- That, in light of the release of HUD's Affirmatively Furthering Fair Housing (AFFH) rule on July 16, 2015 and the new data analysis tools made available thereunder, members of the FHIC will conduct an addendum to the existing Analysis of Impediments (herein, "AI") informed by the instructions and tools provided with the new rule (including the Assessment Tool for local governments published December 31, 2015, the HUD AFFH Data and Mapping tool, and AFFH Rule Guidebook), to be completed by April 15, 2017, subject to delays beyond reasonable control;
- That such addendum to the existing AI will consider, both regionally and specific to each jurisdiction, the fair housing issues of segregation, racially or ethnically concentrated areas of poverty, access to opportunity and disproportionate housing needs (as defined in the rule and Assessment Tool), and will consider, in particular, the distribution of affordable housing resources in the region;
- That the process for completing the addendum to the existing AI will provide for robust community participation;
- That the AI process will seek to develop innovative regional strategies that may serve as best practices for entitlement communities going forward.

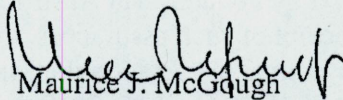
The Department welcomes further discussions with the FHIC and its entitlement communities to clarify the exact parameters of this process.

Your jurisdictions may provide the requested assurances by signing the attached statement and submitting it with your 2016 Annual Action Plan certifications. To facilitate this process, each jurisdiction may sign a separate copy of the statement.

Please note that this letter does not in any way impact any authority the Department may have to investigate any complaint involving the entitlement communities made pursuant to the Fair Housing Act, or any other legal authority within the Department's jurisdiction.

The Department appreciates your continued commitment to working on these issues. If you have any questions or concerns about the contents of this letter, please do not hesitate to contact me at (312) 913-8400 or at [maurice.j.mcgough@hud.gov](mailto:maurice.j.mcgough@hud.gov).

Sincerely,

  
Maurice J. McGough  
FHEO Region V Director



Attachment

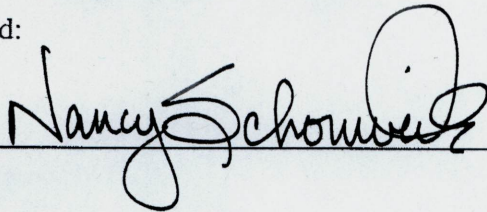
### Road Map to Revise Analysis of Impediments

Pursuant to a mutual commitment to affirmatively further fair housing, members of the Fair Housing Implementation Council (FHIC) – Anoka County, Dakota County, Hennepin County, Ramsey County, Washington County, the City of Bloomington, the City of Coon Rapids, the City of Eden Prairie, the City of Minneapolis, the City of Minnetonka, the City of Plymouth, the City of St. Paul, and the City of Woodbury – pledge the following:

- That, in light of the release of HUD's Affirmatively Furthering Fair Housing (AFFH) rule on July 16, 2015 and the new data analysis tools made available thereunder, members of the FHIC will conduct an addendum to the existing Analysis of Impediments (herein, "AI") informed by the instructions and tools provided with the new rule (including the Assessment Tool for local governments published December 31, 2015, the HUD AFFH Data and Mapping tool, and AFFH Rule Guidebook), to be completed by April 15, 2017;
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- That the process for completing the addendum to the existing AI will provide for robust community participation;
- That the AI process will seek to develop innovative regional strategies that may serve as best practices for entitlement communities going forward.

Date: 5-6-16

Signed:

  
\_\_\_\_\_

18-10-18  
George Johnson



**Application for Federal Assistance SF-424**

**\* 1. Type of Submission:**

- Preapplication
- Application
- Changed/Corrected Application

**\* 2. Type of Application:**

- New
- Continuation
- Revision

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

**\* Other (Specify):**

**\* 3. Date Received:**

**4. Applicant Identifier:**

MN279037

**5a. Federal Entity Identifier:**

Dakota County

**5b. Federal Award Identifier:**

MN279037

**State Use Only:**

**6. Date Received by State:**

**7. State Application Identifier:**

**8. APPLICANT INFORMATION:**

**\* a. Legal Name:**

Dakota County, MN

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

41-1253302

**\* c. Organizational DUNS:**

9631081210000

**d. Address:**

**\* Street1:**

1590 West Highway 55

**Street2:**

**\* City:**

Hastings

**County/Parish:**

**\* State:**

MN: Minnesota

**Province:**

**\* Country:**

USA: UNITED STATES

**\* Zip / Postal Code:**

55033-2343

**e. Organizational Unit:**

**Department Name:**

Community and Economic Develop

**Division Name:**

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

**Prefix:**

Mrs.

**\* First Name:**

Lisa

**Middle Name:**

**\* Last Name:**

Alfson

**Suffix:**

**Title:**

Director of Community and Economic Developmen

**Organizational Affiliation:**

Dakota County Community Development Agency

**\* Telephone Number:**

651-675-4467

**Fax Number:**

651-287-8024

**\* Email:**

lalfson@dakotacda.state.mn.us



**Application for Federal Assistance SF-424**

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

B: County Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

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

Department of Housing and Urban Development

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

14.218

CFDA Title:

Community Development Block Grants/Entitlement Grants

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

\* Title:

**13. Competition Identification Number:**

B-16-UC-27-0003

Title:

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

Add Attachment

Delete Attachment

View Attachment

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

2016 CDBG Activities

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments



**Application for Federal Assistance SF-424**

**16. Congressional Districts Of:**

\* a. Applicant

\* b. Program/Project

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

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**

\* a. Start Date:

\* b. End Date:

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

* a. Federal	<input type="text" value="1,772,394.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="400,000.00"/>
* g. TOTAL	<input type="text" value="2,172,394.00"/>

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

a. This application was made available to the State under the Executive Order 12372 Process for review on

b. Program is subject to E.O. 12372 but has not been selected by the State for review.

c. Program is not covered by E.O. 12372.

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

Yes  No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

\*\* I AGREE

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

**Authorized Representative:**

Prefix:  \* First Name:

Middle Name:

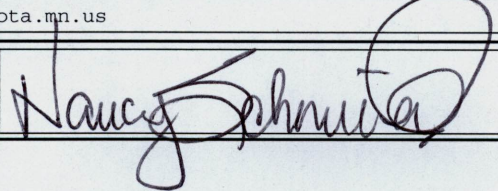
\* Last Name:

Suffix:

\* Title:

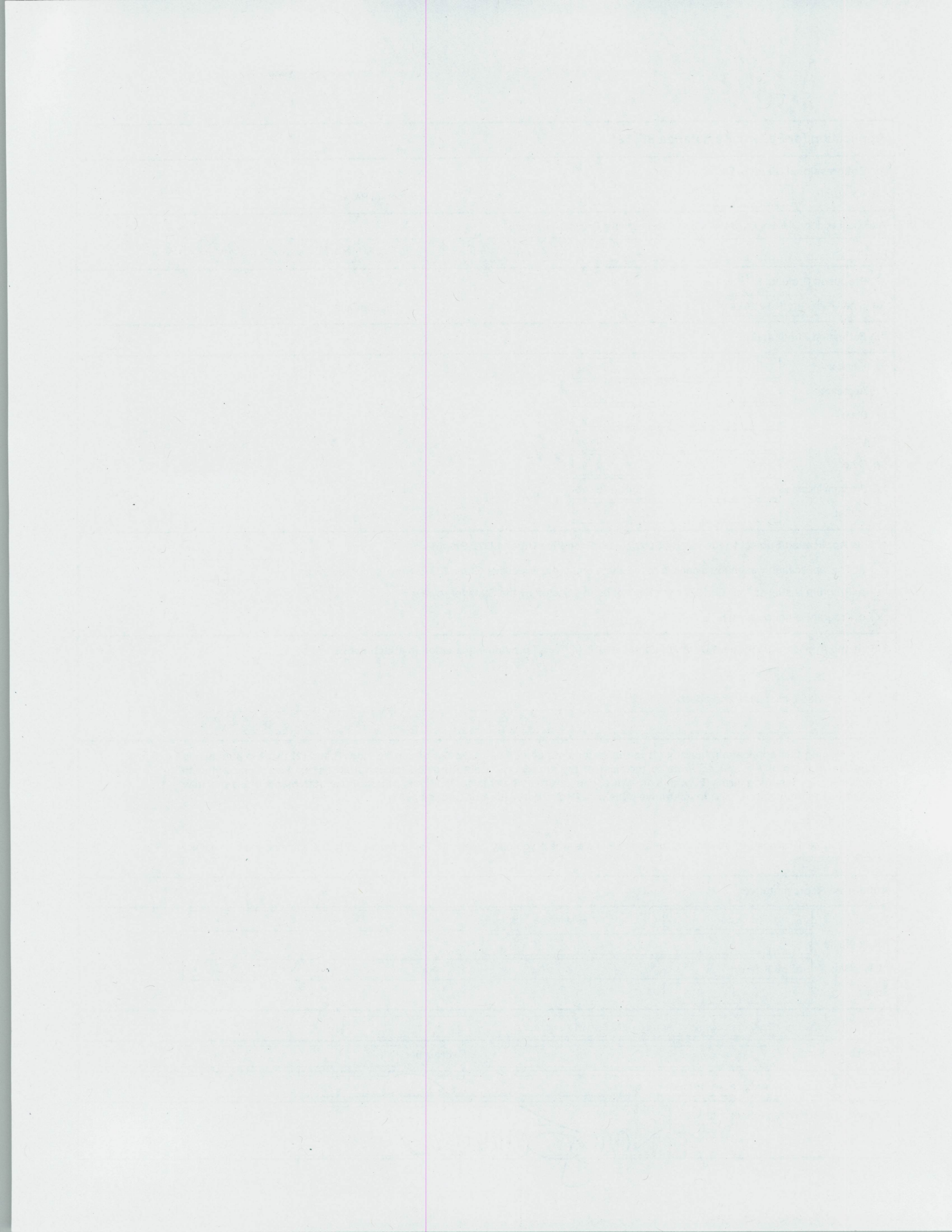
\* Telephone Number:  Fax Number:

\* Email:

\* Signature of Authorized Representative: 

\* Date Signed:







Application for Federal Assistance SF-424			
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application		* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	
		* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>	
* 3. Date Received: <input type="text"/>		4. Applicant Identifier: <input type="text"/>	
5a. Federal Entity Identifier: <input type="text" value="Dakota County"/>		5b. Federal Award Identifier: <input type="text" value="MN279037"/>	
<b>State Use Only:</b>			
6. Date Received by State: <input type="text"/>		7. State Application Identifier: <input type="text"/>	
<b>8. APPLICANT INFORMATION:</b>			
* a. Legal Name: <input type="text" value="Dakota County, MN"/>			
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="41-1253302"/>		* c. Organizational DUNS: <input type="text" value="9631081210000"/>	
<b>d. Address:</b>			
* Street1:	<input type="text" value="1590 West Highway 55"/>		
Street2:	<input type="text"/>		
* City:	<input type="text" value="Hastings"/>		
County/Parish:	<input type="text"/>		
* State:	<input type="text" value="MN: Minnesota"/>		
Province:	<input type="text"/>		
* Country:	<input type="text" value="USA: UNITED STATES"/>		
* Zip / Postal Code:	<input type="text" value="55033-2343"/>		
<b>e. Organizational Unit:</b>			
Department Name: <input type="text" value="Community and Economic Develop"/>		Division Name: <input type="text"/>	
<b>f. Name and contact information of person to be contacted on matters involving this application:</b>			
Prefix:	<input type="text" value="Mrs."/>	* First Name:	<input type="text" value="Lisa"/>
Middle Name:	<input type="text"/>		
* Last Name:	<input type="text" value="Alfson"/>		
Suffix:	<input type="text"/>		
Title:	<input type="text" value="Director of Community and Economic Developmen"/>		
Organizational Affiliation: <input type="text" value="Dakota County Community Development Agency"/>			
* Telephone Number:	<input type="text" value="651-675-4467"/>	Fax Number:	<input type="text" value="651-287-8024"/>
* Email:	<input type="text" value="lalfson@dakotacda.state.mn.us"/>		



**Application for Federal Assistance SF-424**

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

B: County Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

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

Department of Housing and Urban Development

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

14.231 ESG

CFDA Title:

Emergency Solutions Grants Program

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

\* Title:

**13. Competition Identification Number:**

E-16-UC-27-0003

Title:

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

Add Attachment

Delete Attachment

View Attachment

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

2016 ESG Activities

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments



**Application for Federal Assistance SF-424**

**16. Congressional Districts Of:**

\* a. Applicant

\* b. Program/Project

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

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**

\* a. Start Date:

\* b. End Date:

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

* a. Federal	<input type="text" value="150,546.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="150,546.00"/>

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

a. This application was made available to the State under the Executive Order 12372 Process for review on

b. Program is subject to E.O. 12372 but has not been selected by the State for review.

c. Program is not covered by E.O. 12372.

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

Yes  No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

\*\* I AGREE

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

**Authorized Representative:**

Prefix:

\* First Name:

Middle Name:

\* Last Name:

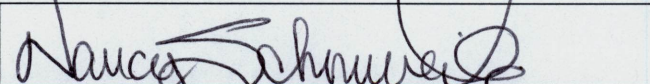
Suffix:

\* Title:

\* Telephone Number:

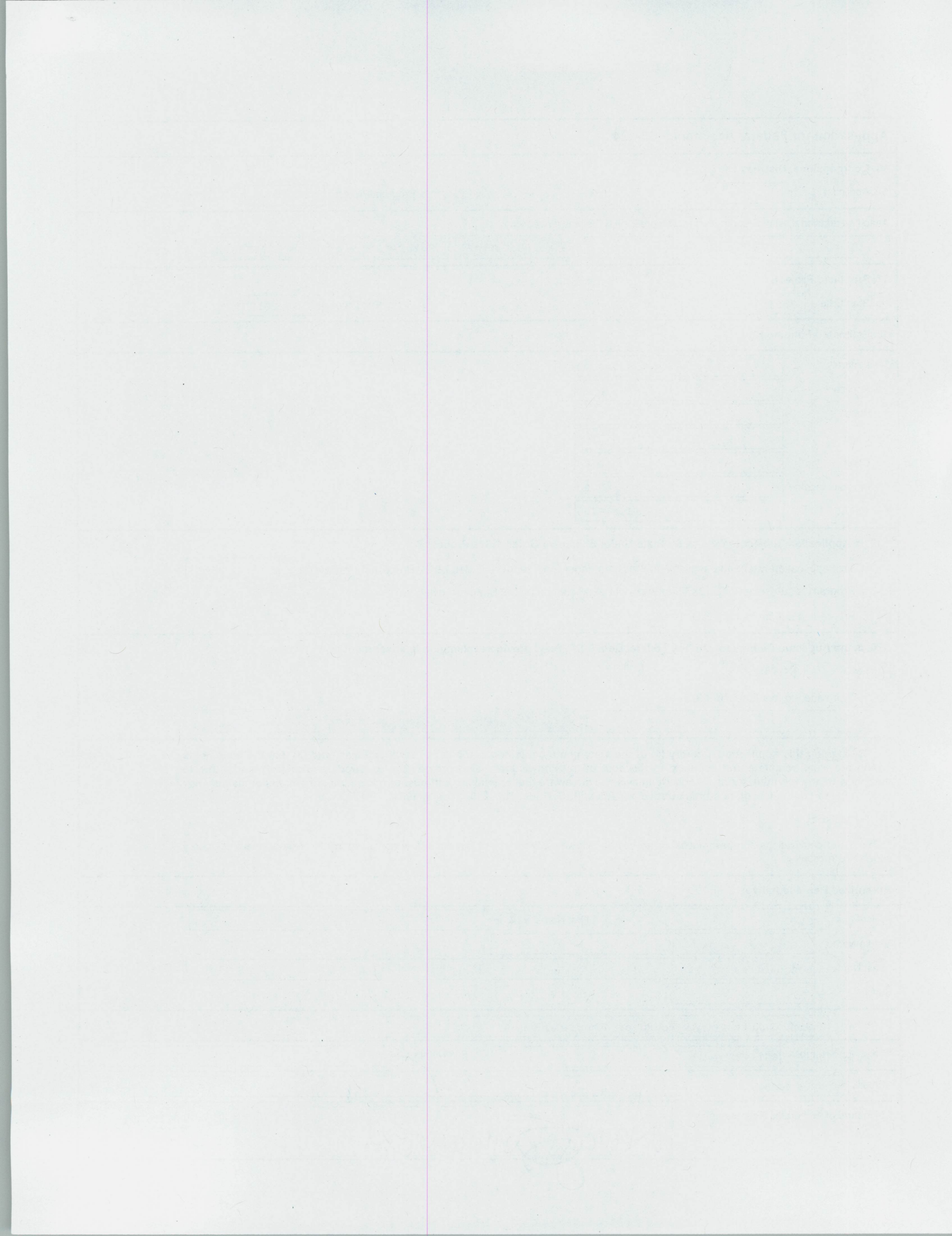
Fax Number:

\* Email:

\* Signature of Authorized Representative: 

\* Date Signed:







Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
* 3. Date Received: <input type="text"/>	* 4. Applicant Identifier: <input type="text"/>	
5a. Federal Entity Identifier: <input type="text" value="Dakota County"/>	5b. Federal Award Identifier: <input type="text" value="MN279037"/>	
<b>State Use Only:</b>		
6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>	
<b>8. APPLICANT INFORMATION:</b>		
* a. Legal Name: <input type="text" value="Dakota County, MN"/>		
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="41-1253302"/>	* c. Organizational DUNS: <input type="text" value="9631081210000"/>	
<b>d. Address:</b>		
* Street1: <input type="text" value="1590 West Highway 55"/>	Street2: <input type="text"/>	
* City: <input type="text" value="Hastings"/>	County/Parish: <input type="text"/>	
* State: <input type="text" value="MN: Minnesota"/>	Province: <input type="text"/>	
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Department Name: <input type="text" value="Community and Economic Develop"/>	Division Name: <input type="text"/>	
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Suffix: <input type="text"/>	Title: <input type="text" value="Director of Community and Economic Developmen"/>	
Organizational Affiliation: <input type="text" value="Dakota County Community Development Agency"/>		
* Telephone Number: <input type="text" value="651-675-4467"/>	Fax Number: <input type="text" value="651-287-8024"/>	
* Email: <input type="text" value="lalfson@dakotacda.state.mn.us"/>		



**Application for Federal Assistance SF-424**

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

B: County Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

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

Department of Housing and Urban Development

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

14.239 HOME

CFDA Title:

HOME Investment Partnerships Program

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

\* Title:

**13. Competition Identification Number:**

M-16-DC-27-0203

Title:

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

Add Attachment

Delete Attachment

View Attachment

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

2016 HOME Activities

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments



**Application for Federal Assistance SF-424**

**16. Congressional Districts Of:**

\* a. Applicant

\* b. Program/Project

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

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**

\* a. Start Date:

\* b. End Date:

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

* a. Federal	<input type="text" value="1,777,245.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="300,000.00"/>
* g. TOTAL	<input type="text" value="2,077,245.00"/>

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

a. This application was made available to the State under the Executive Order 12372 Process for review on

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c. Program is not covered by E.O. 12372.

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

Yes  No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

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\*\* I AGREE

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

**Authorized Representative:**

Prefix:  \* First Name:

Middle Name:

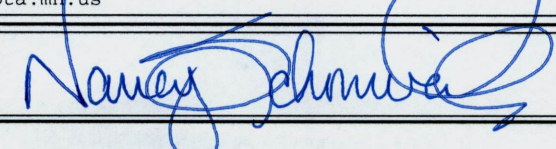
\* Last Name:

Suffix:

\* Title:

\* Telephone Number:  Fax Number:

\* Email:

\* Signature of Authorized Representative: 

\* Date Signed:



Handwritten signature and scribbles at the bottom of the page.