

IV. Assessment of Past Goals, Actions and Strategies

- a. *Indicate what fair housing goals were selected by program participant(s) in recent Analyses of Impediments, Assessments of Fair Housing, or other relevant planning documents.*

The 2014 Regional Analysis of Impediments for the Twin Cities Region identified the following impediments to fair housing choice and provided recommended action steps to address each.

1. Impediment: Potential homebuyers of color are denied for home purchase loans at rates exceeding White homebuyers.

Recommendations:

- 1.1. Development of partnerships with reputable credit counseling agencies and financial literacy trainers to reach communities of color and create pipeline of potential homebuyers who are ready and qualified to purchase a home.

Minneapolis: The City of Minneapolis, through its Minneapolis Homes suite of programs, strives to reduce income disparities by building the capacity of underrepresented homebuyers, homeowners and developers to participate in City programs. Minneapolis Homes provides financing for financial wellness, homebuyer education and foreclosure prevention counseling. The City provides financial support to the Minnesota Homeownership Center to provide services through a network of providers for one-on-one counseling, online tutorials and in-person classes in a variety of languages, including Hmong, Spanish, Somali and English.

Hennepin County: The County partnered with Community Action Partnership Hennepin County to help inform potential homebuyers how to develop a strong credit history through financial counseling to become home ownership ready.

Scott County: The County has partnered with Comunidades Latinas Unidas en Servicio (CLUES) and the Neighborhood Development Alliance to conduct housing counseling training. They are working on a similar partnership with the African Development Center.

Saint Paul: The City of Saint Paul financially supported the Minnesota Homeownership Center (Center) which offers individualized financial wellness and home buyer counseling, homebuyer education classes (*Home Stretch* workshops), which included multicultural and multilingual homebuyer classes. Homeownership workshops were held in English, Hmong, Somali, Karen, and Spanish. The Center also works directly with the African Development Center and African Economic Development Solutions to outreach to Somali and Africans new to America.

Subsequently, Fannie Mae worked with the Center's *Framework* in which households who purchase Fannie Mae properties through its *HomeReady Buyer* program will be eligible for up to 3% off the purchase price of the home in the form of closing cost assistance.

The City also created a down payment assistance program to promote homeownership for households at or below 60% AMI.

Washington County: The Washington County CDA continues to develop relationships with organizations in order to increase the number of households of color the CDA serves. Such partnerships include the Black Women's Wealth Alliance in which it provided Home Stretch Workshops that were culturally sensitive to historical racism many people of color experienced/experience in North Minneapolis and how to overcome these obstacles. Additionally, the CDA shares affordable housing opportunities, affordable loan programs, and down payment assistance opportunities within Washington County with organizations that serve a larger population of persons of color including PRG, Build Wealth MN, Comunidades Latinas Unidas en Servicio (CLUES), Neighborhood Development Alliance (NEDA), Urban League of Minneapolis, and Twin Cities Habitat for Humanity. The CDA has and continues to commission an updated report on the comprehensive housing needs for Washington County to better understand who the underserved populations are within the County and what obstacles they encounter in obtaining affordable and fair housing. The CDA continues to offer homebuyer education workshops geared towards educating specific cultural communities with lower rates of homeownership.

Dakota County: Through the homebuyer and homeownership resource connection at the Dakota County CDA, homeownership counselors assisted potential homebuyers of color and helped prepare them for long-term homeownership success.

- The First Time Homebuyer (FTHB) program offers competitive 30 year fixed first mortgage loans, with down payment and closing cost assistance.
- The Dakota County CDA advertises Homebuyer Education and Counseling services and the First Time Homebuyer program on its website.
- Homebuyer Education and Counseling services at the Dakota County CDA continued to be promoted at Dakota County community events and fairs, city offices, libraries, churches, and social service agencies.
- The Dakota County CDA does direct outreach to potential lender and realtor partners within Dakota County to make sure the CDA FTHB program is widely available and that industry partners are aware of Homebuyer Education and Counseling services.
- The Dakota County CDA is a member of SPAAR (Saint Paul Area Association of Realtors) Diversity Committee and MN Homeownership Alliance. The SPAAR Diversity Committee serves as an advocate of fair housing practices and promotes equal opportunities in housing and further diversification within the real estate industry to better serve association members and their communities.
- Annually, the Dakota County CDA mails information on Homebuyer Education and Counseling services and the FTHB program to all Dakota County CDA residents within their Workforce Housing and Public Housing units. The Dakota County CDA tracks both program demographics to ensure they are reaching a diverse clientele that is reflective of Dakota County demographics overall. The Dakota County CDA strives to reach deeper into minority and Hispanic households with these programs than the overall County demographics, but presently the Dakota County CDA is looking to ensure the programs are at least as representative as the County as a whole. For its most recent program year, 47 percent of the clients served by Dakota County CDA housing counselors were clients of color. Among all clients served, 44 percent were below the 50 percent AMI income threshold. The demographics of the Dakota County CDA's First Time Homebuyer Program have remained in line with overall Dakota County

demographics, with 12 percent of borrowers representing minority households. The most common barriers preventing housing counseling clients from qualifying for a mortgage product are income restraints and credit issues, and the Dakota County CDA is actively working with clients, in collaboration with industry partners, to provide budget and credit counseling support for clients that need to address these barriers to achieve mortgage-readiness.

- 1.2. Support local research effort in homeownership loan denial disparity by race that accounts for creditworthiness, as limited data is currently available.

All Jurisdictions: Regional analysis has been done by Dr. Samuel Myers at the University of Minnesota.

2. Impediment: Higher rates of exit from homeownership among households of color.

Recommendations:

- 2.1. Support foreclosure prevention services targeted to households of color.
- 2.2. Promotion of homebuyer education services to minimize subsequent delinquency.

Washington County: The County has a partnership with the Black Women’s Wealth Alliance in which it provided Home Stretch Workshops that were culturally sensitive to historical racism many people of color experienced/experience in lending specifically in North Minneapolis and how to overcome these obstacles and have a higher likelihood of successful homeownership.

The CDA promotes and encourages expanded opportunities for homebuyer education, housing counseling, affordable housing opportunities, affordable loan programs, and down payment assistance opportunities within Washington County with organizations that serve a larger population of persons of color including PRG, Build Wealth MN, Comunidades Latinas Unidas en Servicio (CLUES), Neighborhood Development Alliance (NEDA), Urban League of Minneapolis, and Twin Cities Habitat for Humanity. The CDA does not require clients to receive Homebuyer counseling and education at the CDA in order to qualify for down payment assistance but does require counseling and education be done by a HUD approved Housing Counseling agency. This gives potential clients freedom of choice, easier access to housing related programs, and less restrictions on where they can obtain homebuyer counseling and education opportunities in order to access our programs.

- 2.3. Explore concept of post-purchase counseling to minimize delinquency.
- 2.4. Market and promote foreclosure prevention services to households of color.
- 2.5 Promote and encourage expanded opportunities for housing counseling specifically directed at protected classes.

Hennepin County: Hennepin County’s Housing and Redevelopment Authority funded homeownership centers, and continues to fund foreclosure prevention programs.

Dakota, Scott, Washington Counties: All three counties fund homeownership education and foreclosure prevention programs.

Dakota County: Foreclosure literature was and 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 Dakota County CDA. Dakota County CDA staff provided free Foreclosure Advising services to any Dakota County resident facing the possibility of foreclosure. (see above under 1.1) Through the homebuyer and homeownership resource connection at the Dakota County CDA, homeownership counselors assisted potential homebuyers of color and helped prepare them for long-term homeownership success.

Saint Paul: The City of St. Paul is one of several HUD-approved housing counseling agencies providing counseling in the City of St. Paul under the umbrella of the Minnesota Home Ownership Center (MNHOC). The network of agencies providing mortgage default/early delinquency counseling in the city of St. Paul assist households with guidance and assistance for submission of mortgage modifications, working with their mortgage servicer on a smooth transition out of the home (short sale or deed in lieu of foreclosure), and providing information about the foreclosure process and moving on after foreclosure.

The network of agencies provides individualized mortgage foreclosure prevention counseling by working with the homeowner to create an action plan and viable budget. In addition, the housing advisers provide referrals to community resources, such as food shelves, formal budget counseling, bankruptcy counseling, legal aid and as necessary emergency assistance from Ramsey County. Most importantly, the network of agencies assists homeowners in default by communicating with mortgage servicers for modifications, forbearance agreements, or repayment plans, taking the burden of communication off the homeowner.

Minneapolis: The City of Minneapolis provides funding to the Minnesota Home Ownership Center for foreclosure prevention counseling and homebuyer education services for Minneapolis residents.

3. Impediment: Homeownership perceived as unattainable by some households of color.

Recommendation:

- 3.1. Pursue increased local jurisdiction partnerships with agencies dedicated to expanding homeownership equity and reducing the homeownership gap.

Anoka County: In 2018, the County acquired four single-family homes for rehabilitation and sold them to non-profits that provide low-to-moderate income housing. The County also used CDBG funds to assist 17 low- or moderate-income families rehabilitate their homes.

Dakota County: Since 2015, the Dakota County CDA has provided down payment assistance to 173 households. Homebuyers purchasing their first home in Dakota County can access: Fixed interest rate mortgage financing, Mortgage Credit Certificate, \$8,500 in down payment and closing cost assistance, and Reduced Private Mortgage Insurance (PMI) with our conventional HFA preferred mortgage. Dakota County CDA has also partnered with Twin Cities Habitat for Humanity to redevelop vacant NSP lots which are then sold to qualified low income homebuyers.

Hennepin County: From 2015- 2019 the County has heavily invested in affordable housing land trusts through the West Hennepin Affordable Housing Land Trust (WHAHLT) and supported the acquisition and resale of 35 single family homes within suburban Hennepin County. Almost half of these units were resold to households of color. City of Lakes Community Land Trust (CLCLT), Habitat for Humanity, Urban Home Works, and other organizations have been funded with County funds to support home ownership of people of color. The County's Affordable Housing Incentive Fund has also funded home ownership opportunities for people of color. Finally, Hennepin County has invested CDBG funds for direct homebuyer assistance programs in the cities of Richfield and Brooklyn Center.

Eden Prairie: From 2015-2017, Eden Prairie provided down payment assistance to 10 households. The City also provided varied housing assistance programs to 281 low- to moderate-income households. Three homes were also purchased and re-sold using funds from the Affordable Housing Trust Fund.

Minneapolis: Minneapolis offers down payment and closing cost assistance for the purchase of homes that are financed through the Minneapolis Homes real estate production suite of products to overcome barriers to ownership. HOM funds are reserved for participants in financial wellness counseling. Grow North provides people who work in North Minneapolis with down payment assistance to purchase a home in North Minneapolis. The Homebuyer Incentive provides forgivable loans to homeowners who purchase a City-owned vacant lot to develop their own home. The rate of service to BIPOC households through the City's down payment assistance programs more than doubled from 2015 to 2018. The City is also contemplating changes to its Minneapolis Homes Program to create more long-term affordability options for homeownership.

Plymouth: Since 2015, Plymouth provided down payment assistance to 10 households through its First Time Homebuyer program.

Woodbury: The City of Woodbury still operates a first time homebuyers program but has seen a recent uptick in "renters by choice."

Metropolitan Council: The Met Council operates affordable homeownership workshops with several municipalities in the region.

Saint Paul: The City of Saint Paul, along with the City of Minneapolis, participated with HOCs *Home Ownership Alliance* (HOA) initiative, a collaboration of more than 30 organizations committed to equitable homeownership for people of color and lower-income households. The HOA brings together organizations that represent a range of communities, including the Neighborhood Development Alliance, and NeighborWorks Home Partners and Twin Cities Habitat for Humanity. The HOA leverages these partnerships to create paths for underserved communities to achieve equitable, affordable homeownership.

An example of the HOA's collaborative innovation is the launch of the "Get Ready. Be Ready" campaign to reach African Americans in St. Paul's East Side and North Minneapolis. To reach these potential homeowners, the HOA works with community representatives to create key messages addressing known myths about homeownership, and invest in community radio and print

media, along with social media and outreach to community leaders. In the coming year, there are plans to expand this outreach to other populations affected by a lack of access, including East African, Hispanic, and Southeast Asian communities.

The HOA is also advocating for systems change in the very programs intended to advance affordable homeownership. Research has shown that the existing down payment assistance (DPA) ecosystem is inconsistently funded, limits consumer choice, and hinders buyers' ability to compete in a tight market. Further, lenders can be reluctant to work with complex programs with varying features, and cite uncertainty about compliance with the secondary market as an obstacle to working with DPA programs.

The City also created a down payment assistance program to promote homeownership for households at or below 60% AMI.

Washington County: The Washington County CDA developed a down payment assistance program with a goal that at least 50% of the loans will go to households of color and/or those at or below 64% of the area median income. The loan is deferred and interest free as to not add to frontend housing costs, help lower first mortgage payments, help buyers reach minimum down payment requirements better loan products may offer, and help promote successful homeownership. In the past five years, CDBG funds have been allocated to the Home Improvement Loan Program which assisted 31 low-to moderate income households with necessary health and safety repairs to their homes.

4. Impediment (Hennepin County, Ramsey County, City of Minneapolis, and City of St. Paul): Predatory lending practices towards immigrants, communities of color, and disabled households, in the form of contract-for-deed.

Recommendations:

4.1. Development of partnerships with local lending institutions, encouraging affirmative marketing and funding for homebuyer programs that reach new Americans, communities of color and the disabled.

4.2. Partner with local programs educating contract-for-deed purchasers in new American communities, communities of color and households with disabled members about the process with a special focus on the additional protections under Minnesota Statutes §559.202 that went into effect for contracts entered into after August 2013.

Hennepin County: In every home ownership program that Hennepin County funds, the County never uses and avoids the contract for deed model and requires a fixed interest rate for home purchases.

Minneapolis: Participated in the Minnesota Homeownership Opportunity Alliance, which specifically looks at barriers to homeownership experienced by different cultural communities, affirmative marketing to overcome culturally specific barriers, and product development to fill the gaps in service experienced by underserved communities. Focus to date included Black/African-American, Black immigrant (Somali, Ethiopian, etc.), and Muslim households. Focus in 2020 is Hispanic/Latinx households. Participated in a study with the Twin Cities Local Initiatives Support Corporation to assess product development options to better serve borrowers whose faith is averse

to mortgage loans with interest. Provides funding to the Minnesota Homeownership Center, which provides homebuyer education in multiple languages through multiple organizations that have cultural competencies servicing communities of color and new American communities.

St. Paul: The City of Saint Paul financially supported the Minnesota Homeownership Center (Center) which offers individualized financial wellness and home buyer counseling, homebuyer education classes (Home Stretch workshops), which included multicultural and multilingual homebuyer classes. Homeownership workshops were held in English, Hmong, Somali, Karen, and Spanish. The Center also works directly with the African Development Center and African Economic Development Solutions to outreach to Somali and Africans new to America.

Additionally, the City of Saint Paul participated with HOCs Home Ownership Alliance (HOA) initiative, a collaboration of more than 30 organizations committed to equitable homeownership for people of color and lower-income households. The HOA brings together organizations that represent a range of communities, including the Neighborhood Development Alliance, and NeighborWorks Home Partners and Twin Cities Habitat for Humanity. The HOA leverages these partnerships to create paths for underserved communities to achieve equitable, affordable homeownership.

5. Impediment: Housing choices for people of color are impacted by perceptions about school performance and neighborhood safety.

Recommendations:

- 5.1. Conduct paired testing to see if race influences neighborhood recommendations in the homebuying process.
- 5.2. Develop outreach and education strategies based on results of paired testing.

All Jurisdictions: The Fair Housing Implementation Council jurisdictions were counseled against paired testing due to a recent Minnesota Supreme Court decision. Hennepin County still conducts standard rental testing.

6. Impediment: Limited number of rental units with 3+ bedrooms.

Recommendation:

- 6.1. Support extra points in RFP processes for development proposals that include a higher proportion of units with 3+ bedrooms.

Met Council: The Met Council provides extra points for RFPs submitted for Livable Communities Grant funds.

Hennepin County: The County provides extra points in accordance with this recommendation.

Minneapolis: The City provides extra points in accordance with this recommendation for RFPs submitted for Affordable Housing Trust Fund dollars and through QAP.

Eden Prairie: The City remains active in promoting larger bedroom developments.

St. Paul: To encourage the development of 3+ bedroom units, extra points will be awarded to tax credit projects that promote family housing where 25% of more of the units in the project have three or more bedrooms.

Washington County: The Washington County CDA is a sub allocator of tax credits, the CDBG administrator for Washington County and a member of the Dakota County HOME Consortium. In its CDBG and HOME application processes, the CDA awards extra points for projects that are proposing creation or rehabilitation of housing units that serve large related families (5+ persons) and/or has family friendly components.

7. Impediment: High rental application denial rate in communities of color and those with disabilities based on rental selection criteria (criminal background, credit history, rental background).

Recommendations:

7.1. Provide education for landlords on how to create policies that allow for adapting rental criteria for renters with difficult backgrounds through exceptions. Education focused on considering exceptions based on length of time since the barrier was created, nature of the offense, how to minimize risk, and working with renters that have access to supportive services. Also offer education on which type of police calls impact a landlord's rental license.

St. Paul: The Department of Safety and Inspections requires all new Certificate of Occupancy holders to attend a "Landlord 101" training course, which covers fair housing, tenant screening, and landlord/tenant responsibilities, among other modules.

As part of the QAP, projects are required to have a Tenant Selection Plan, which addresses criminal history. A condition of receiving LIHTC through the St. Paul HRA is developing a criminal background screening process that implements 2016 HUD Guidance. In 2020, the City introduced a set of tenant protection policies including tenant screening guidelines that address criminal, credit, and rental history, as well as limits on the upfront costs of rental housing.

Dakota County: Dakota County provided education to landlords and tenants on rights and responsibilities.

Washington County: Washington County provided education for landlords on how to create policies that allow for adapting rental criteria for renters with difficult backgrounds through exceptions, education focused on considering exceptions based on length of time since the barrier was created, nature of the offense, how to minimize risk, and working with renters that have access to supportive services, and education on which type of police calls impact a landlord's rental license.

7.2. Provide education for renters, human service professionals, and community organizations on rental selection criteria and how to effectively communicate with landlords.

Washington County: The County co-produced ECHO Fair Housing Videos: In collaboration with cities and counties in the Twin Cities Metro, production "A good, safe place to live." The videos

are 5-minute digital shorts in English, Spanish, Somali, Karen, and Hmong to help new Minnesota renters understand their rights and responsibilities as tenants. The video provides basic knowledge of the laws that protect them, around discrimination, home safety and potentially predatory landlords.

Dakota County: The ECHO rental fair housing video “A Good, Safe Place to Live” is available on the Dakota County CDA website in five languages that include English, Spanish, Hmong, Somali and Karen. The Dakota County CDA contributed funding to the creation of the videos and continues to market the ECHO rental fair housing video/program. The videos help new Minnesotans understand their rights and responsibilities as tenants, Twin Cities PBS (TPT) program “ECHO” produced a short video in five languages, covering the basics of tenant and landlord rights and obligations. The program “A Good, Safe Place to Live” is available in these languages: Hmong, Karen, Somali, Spanish and basic English. The program was developed in collaboration with more than thirty community and governmental partners, including housing and redevelopment authorities and community development agencies from the seven-county metro area, as well as legal aid organizations, state housing authorities and others. The program premiered statewide on TPT’s Minnesota Channel on April 11, 2016, and is also available on DVD, and online at tpt.org/echo. In addition, a curriculum for English Language Learning classrooms is in development, allowing adult learners to discover more about housing issues while mastering English. Furthermore, ECHO plans to pair its cultural outreach coordinators with educators around the state to help communities absorb this important information.

Dakota County Social Services staff provides and distributes tenant and landlord marketing materials with a clear message about available assistance to resolve housing crises and prevent homelessness. The goal is to have this information provided at lease signing or other interactions between landlords and tenants to encourage them to refer tenants to resources instead of resorting to eviction. The tenant information is in English, Spanish and Somali.

FHIC: The FHIC funded a project completed by Southern Minnesota Regional Legal Services housing discrimination attorneys and staff who partnered with seven local organizations serving immigrant communities and conducted nine fair housing trainings with 169 attendees. The trainings focused on renters’ rights and responsibilities and fair housing law. The trainings were also highly visual. Additionally, even though the trainings were directed toward the clients of the agencies, the staff of the agencies also received the same information which allows the staff to better assist their clients.

7.3. Encourage police departments to clearly explain the use of police call records in rental license programs, including the types of calls (domestic violence and medical emergencies) excluded from rental license regulations.

7.4. Provide fair housing education for Crime Free Multi-Housing program educators and local police departments.

Hennepin County: The County encourages landlords in the non-Minneapolis municipalities to change their screening criteria. Many suburban Hennepin County cities have passed tenant protection ordinances including Saint Louis Park, Brooklyn Park, Brooklyn Center, and other

cities, Hennepin County does not have the jurisdiction to enforce tenant protections without the city participation.

Minneapolis: The City adopted an ordinance in 2019 that provide increased tenant protections during the screening process. Tenants cannot be denied for misdemeanor convictions older than three years, felony convictions older than seven years, and serious offenses older than ten years, with some exceptions. The ordinance also prohibits the use of a credit score to deny applicants and places a cap on security deposits. In 2018, the City updated its Conduct on Licensed Premises Ordinance to change the way properties are classified as “disorderly” to attempt to reduce negative consequences on tenants.

Woodbury: The City provides fair housing training to property managers of licensed rental properties.

Dakota County: The Dakota County CDA annually hosts a Fair Housing Training with an attorney in the Fall. The training is targeted to area landlords and property owners to discuss a variety of issues related to rental housing and the Housing Choice Voucher program, as well as fair housing and equal access to housing. An attorney specializing in fair housing law presents information to ensure that the landlords and property owners receive the most current, accurate information regarding fair housing. The Dakota County CDA holds monthly landlord/owner workshops about the HCV Program for rental property owners and landlords that provide tools, tips and information on requirements and policies. Fair housing information is also included.

Scott County: The Scott County CDA partnered with the University of Minnesota through a program called Resilient Communities. Students worked with County staff to develop educational programming for both residents and landlords. The CDA also hosts 2-3 landlord workshops a year. In response to concerns that landlords don’t want to rent to HCV holders because they do not keep their units clean, the U of M students developed a brochure for residents on how to keep their units clean.

Carver County: The County has provided annual fair housing training for service providers for the last three years. Additionally, 2019 was the beginning of an annual fair housing training for landlords operating within the county.

8. Impediment: Inability to place tenant based rental assistance vouchers for those with disabilities, households with children, and households of color, including but not limited to Housing Choice Vouchers.

Recommendations:

- 8.1. Market and promote the benefits of accepting tenant based rental assistance to landlords and the unique characteristics of programs beyond Housing Choice Vouchers.
- 8.2. Assist voucher holders in their housing search by referring them to resources that list properties where Housing Choice Vouchers may be accepted.

Washington County: The CDA has a vacancy list in the County that is updated with units that are available for rent. It also indicates whether or not that landlord is willing to accept a Housing Choice Voucher. On its website, there is a section specifically for resident resources.

8.3. Develop and share strategies and best practices about how landlords can have a successful experience renting to those with tenant-based rental assistance.

Minneapolis: The City has a pool of landlords that are known for their acceptance of vouchers. The City also passed an ordinance barring discrimination against rental assistance recipients, including Housing Choice Voucher holders, but enforcement is currently stayed pending a legal challenge. The City requires that any housing that receives city assistance accept Housing Choice Vouchers. The City requires all projects that receive City assistance to post vacancies on HousingLink.

The City led the creation of the Stable Homes Stable Schools Program, a collaborative effort of the City of Minneapolis, the Minneapolis Public Housing Authority, the Minneapolis Public Schools and Hennepin County Health and Human Services to provide funding and services for families experiencing homelessness or facing the threat of losing their home. Hennepin County and the YMCA contribute to the program by providing essential support services to help families succeed. The City, together with MPHA, is doing extensive landlord outreach, including direct mailings and one-on-one meetings with landlords, to share information about the program to find rental units for families. The program has been running for a year and has already assisted hundreds of children.

Bloomington, Metropolitan Council, Hennepin County: These jurisdictions have mobility counseling to assist voucher holders in their housing searches.

Dakota County: The Dakota County CDA maintains a list of owners that are willing to lease a unit to an eligible HCV family or to help the HCV family find a unit and will provide this list to the HCV family as part of the informational briefing packet. The Dakota County CDA holds monthly landlord/owner workshops about the HCV Program for rental property owners and landlords that provide tools, tips and information on requirements and policies. Fair housing information is also included. All Dakota County CDA activities that may affect an owner's ability to lease a unit will be processed as rapidly as possible, in order to minimize vacancy losses for owners. The CDA holds an annual owners' conference to discuss any program changes and new topics as well as provide an opportunity for owners to ask questions, obtain written materials and meet program staff. The CDA provides owners with a handbook that explains the program, including HUD and CDA policies and procedures, in easy-to-understand language. The CDA gives special attention to helping new owners succeed through activities such as:

- The CDA requires first-time owners (or their agents) to participate in a briefing session on HAP contract requirements.
- Provides the owner with a designated CDA contact person.
- Provides other written information about how the program operates, including answers to frequently asked questions.
- Provides program information as well as frequently used forms on the CDA Website.

Washington County: The CDA offers a landlord handbook that offers strategies and best practices about how landlords can have a successful experience renting to those with tenant-based rental assistance.

8.4 Entitlement jurisdictions shall include in the contract documents of rental housing developments funded in whole or in part by public financing language prohibiting property owners from rejecting rental applications due to an applicant's receipt of public assistance.

St. Paul: The City continues to require Small Rental Rehab, 4d and HOME projects to accept housing choice vouchers. In addition, the City created the Families First rent supplement program, which provides a monthly rent subsidy of \$300.00 per month for up to three years.

Dakota County: The Dakota County CDA Housing Finance Policy includes the requirement for housing projects financed with private activity bonds, 501(c)(3) bonds, refunding bonds, Low Income Housing Tax Credits, Tax Increment Financing and HOPE funds (a local gap financing source) to participate in the Section 8 Program (aka HCV). The developer is required to sign an agreement that while the bonds/loan/agreement are outstanding, they will not exclude from consideration qualified families receiving assistance from the Section 8 program.

9. Impediment: Development processes in local government can limit construction of affordable housing and housing for people with disabilities.

Recommendations:

9.1. Encourage practices that maximize local government, HRA, CDA, and/or EDA resources that enable housing development for protected classes.

9.2. Review strategies proposed in Urban Land Institute/Regional Council of Mayor's "Reinvesting in the Region: (Re)Development-Ready Guide" available at <http://minnesota.uli.org/wp-content/uploads/sites/31/2012/06/ULI-MNReDevelopment-Ready-Guide-May-2012.pdf> or in HUD's Regulatory Barriers Clearinghouse: <http://www.huduser.org/portal/rbc/home.html> with local government staff.

Saint Paul: The City amended its zoning code to increase housing density in high-use transportation corridors to increase housing development. The City's amended Zoning Code does not impose conditional use permits for supportive housing which is classified as apartments and has increasingly allowed for rezoning for increased building heights; requirements for parkland dedication as a mechanism to ensure adequate amenities for all residents are reduced for affordable housing developments; Accessory Dwelling units (ADU) are now allowed throughout the city; and the Sustainable Building Regulations Ordinance establishes sustainable building regulations for buildings owned, operated or funded by the City ensuring energy efficiency and sustainability and this lower costs for building owners and tenants.

Additionally, Saint Paul's affordable housing policies must comply with the American with Disabilities Act (ADA) when developing multi-family housing projects with 5 or more units; resulting in the creation of more accessibly designed rental housing units.

10. Impediment: NIMBY-ism with regard to siting and placement of affordable housing.

Recommendations:

10.1. Continue to design and manage affordable housing such that it can overcome initial community opposition.

10.2. Analyze how nationwide deconcentration strategies and best practices related to housing and transportation impact fair housing protected classes.

10.3. Review strategies proposed in Urban Land Institute/Regional Council of Mayor's Reinvesting in the Region: (Re)Development-Ready Guide available at <http://minnesota.uli.org/wp-content/uploads/sites/31/2012/06/ULI-MNReDevelopment-Ready-Guide-May-2012.pdf> or in HUD's Regulatory Barriers Clearinghouse: <http://www.huduser.org/portal/rbc/home.html>.

Hennepin County: The County is investing and supporting a communications team in housing to spread the word and message that affordable housing is important and essential to our community. The Communications team has conducted an educational campaign to inform the public on the importance and breaking the stereotypes of affordable housing.

Minneapolis: The City is creating new mechanisms through land use policy and zoning to increase housing density, require more affordable units and allow for more housing types throughout the city. Minneapolis 2040 and Inclusionary Zoning Ordinance and policy are in effect as of January 1, 2020. Minneapolis 2040 was informed by more than three years of engagement with the people of Minneapolis, including over 150 meetings and conversations with thousands of residents, business owners and community members.

The City has taken steps to reduce the cost of developing affordable housing, including zoning text code amendment to allow triplexes, parking reductions, and the ADU ordinance.

Saint Paul: The City amended its zoning code to increase housing density in high-use transportation corridors to increase housing development. The City's amended Zoning Code does not impose conditional use permits for supportive housing which is classified as apartments and has increasingly allowed for rezoning for increased building heights; requirements for parkland dedication as a mechanism to ensure adequate park amenities for all residents are reduced for affordable housing developments; Accessory Dwelling units (ADU) are now allowed throughout the city; and the Sustainable Building Regulations Ordinance establishes sustainable building regulations for buildings owned, operated or funded by the City ensuring energy efficiency and sustainability and this lower costs for building owners and tenants.

Fair Housing Advisory Committee Recommendations

Following the conclusion of the formal AI process, several community groups expressed concern that the community engagement process did not sufficiently consult communities of color and other marginalized groups. As a result, Fair Housing Advisory Committee was formed, and an Addendum to the 2014 Analysis of Impediments to Fair Housing Choice was drafted. The impediments identified and the recommendations made to address them include:

Impediment: Access to housing is reduced for some groups.

Recommendations:

- Work toward enactment of local source of income protection legislation that specifically covering voucher holders.

- Collect and present local data to elected officials illustrating the need for source of income protection; advocate for such local legislation.
- Based on results of Responsible Banking study from U of M, withhold government business from poor-performing financial institutions.
- Develop partnerships with credit counseling agencies to reach communities of color and build a pipeline of potential homebuyers.

Plymouth: The City of Plymouth ensures applications for housing program assistance are available both online and in hard copy, and advertises for both options through numerous community organizations and a variety of mediums.

Woodbury: The City amended its program guidelines across all to require that participants in the Woodbury First-Time Homeownership Program obtain pre-purchase counseling.

- Ensure applications for housing program assistance are available online as well as in hard copy and that both options are advertised.

Minneapolis: The City eliminated single-family zoning. The City adopted a source of income protection ordinance in 2017. It is currently enjoined pending litigation. Pursuant to Title 2, Chapter 16 of the Minneapolis Code of Ordinances relating to Administration: Finance as amended, the City banking relationships are required to provide information related to home mortgage lending and other fair lending activities. This information is gathered through a Financial Institution Disclosure Form submitted to the City annually. This form solicits data for the City of Minneapolis, by census tract, and provides the information required on the mortgage loan disclosure statement pursuant to the Home Mortgage Disclosure Act, 12 U.S. C. Section 2801 et seq. and laws amendatory thereof and supplementary thereto (“HMDA”), for the previous fiscal year.

Proposers for our recent banking services RFP were required to complete the Financial Institution Disclosure Form and this information was taken into consideration during the evaluation process. The City is working with our current depository and winner of the recent Banking RFP to enhance housing affordability by reducing the cost burden of housing and increasing access to safe, affordable places to live, including transitional housing, rentals, and home ownership, with a focus on individuals and families historically shut out of the market.

At the City’s invitation, Wells Fargo is committing to participate, on a best efforts basis, in 2 informational sessions or small group meetings per year, convened by the City, to discuss its affordable housing/mixed income housing lending activity in Minneapolis. Wells Fargo participants will share feedback on affordable housing lending in mixed income developments and any City loan programs in which Wells Fargo participates.

- Wells Fargo may also hold its own convenings on issues related to affordable housing, which may include participation by nonprofit organizations and affordable housing developers. Wells Fargo will invite appropriate City staff/officials to participate in these convenings to provide additional partnership and networking opportunities in the areas of affordable housing development and financing.

- The City of Minneapolis, through its Minneapolis Homes suite of programs, strives to reduce income disparities by building the capacity of underrepresented homebuyers, homeowners and developers to participate in City programs. Minneapolis Homes provides financing for financial wellness, homebuyer education and foreclosure prevention counseling. The City provides financial support to the Minnesota Homeownership Center to provide services through a network of providers for one-on-one counseling, online tutorials and in-person classes in a variety of languages, including Hmong, Spanish, Somali and English.

Multiple Jurisdictions: Several communities are in the process of considering mixed land uses to allow for more housing development.

Hennepin County: The County has modified its homeowner rehabilitation loan program to be more accessible to those of the Muslim faith, moving from an interest-based program, which is banned in Islam, to a fee-based program.

Richfield: The City of Richfield is flexible when it comes to mixed-status households for homebuyer assistance programs.

Bloomington: The City of Bloomington operates a “Learning to Lead” program that is designed to help local residents, specifically diverse residents, become more civically engaged. Program applications are available in Somali and Spanish.

Dakota County: Through the homebuyer and homeownership resource connection at the Dakota County CDA, homeownership counselors assisted potential homebuyers of color and helped prepare them for long-term homeownership success.

- The First Time Homebuyer (FTHB) program offers competitive 30 year fixed first mortgage loans, with down payment and closing cost assistance.
- The Dakota County CDA advertises Homebuyer Education and Counseling services and the First Time Homebuyer program on its website.
- Homebuyer Education and Counseling services at the Dakota County CDA continued to be promoted at Dakota County community events and fairs, city offices, libraries, churches, and social service agencies.
- The Dakota County CDA does direct outreach to potential lender and realtor partners within Dakota County to make sure the CDA FTHB program is widely available and that industry partners are aware of Homebuyer Education and Counseling services.
- The Dakota County CDA is a member of SPAAR (Saint Paul Area Association of Realtors) Diversity Committee and MN Homeownership Alliance. The SPAAR Diversity Committee serves as an advocate of fair housing practices and promotes equal opportunities in housing and further diversification within the real estate industry to better serve association members and their communities.

Annually, the Dakota County CDA mails information on Homebuyer Education and Counseling services and the FTHB program to all Dakota County CDA residents within their Workforce Housing and Public Housing units. The Dakota County CDA tracks both program demographics to ensure they are reaching a diverse clientele that is reflective of Dakota County demographics overall. The Dakota County CDA strives to reach deeper into minority and Hispanic households

with these programs than the overall County demographics, but presently the Dakota County CDA is looking to ensure the programs are at least as representative as the County as a whole. For its most recent program year, 47 percent of the clients served by Dakota County CDA housing counselors were clients of color. Among all clients served, 44 percent were below the 50 percent AMI income threshold. The demographics of the Dakota County CDA's First Time Homebuyer Program have remained in line with overall Dakota County demographics, with 12 percent of borrowers representing minority households. The most common barriers preventing housing counseling clients from qualifying for a mortgage product are income restraints and credit issues, and the Dakota County CDA is actively working with clients, in collaboration with industry partners, to provide budget and credit counseling support for clients that need to address these barriers to achieve mortgage-readiness.

The Dakota County CDA provided an online option for participants to use when applying for HCVs and used the online platform when the HCV waiting list opened in July 2018. It used the online application when the Project Based Voucher waiting list opened in April 2018.

St. Paul: The City of Saint Paul financially supported the Minnesota Homeownership Center (Center) which offers individualized financial wellness and home buyer counseling and homebuyer education classes (Home Stretch workshops), which included multicultural and multilingual homebuyer classes. Homeownership workshops were held in English, Hmong, Somali, Karen, and Spanish. The Center also works directly with the African Development Center and African Economic Development Solutions to outreach to Somali and Africans new to America.

Additionally, the City of Saint Paul participated with HOCs Home Ownership Alliance (HOA) initiative, a collaboration of more than 30 organizations committed to equitable homeownership for people of color and lower-income households. The HOA brings together organizations that represent a range of communities, including the Neighborhood Development Alliance, and NeighborWorks Home Partners and Twin Cities Habitat for Humanity. The HOA leverages these partnerships to create paths for underserved communities to achieve equitable, affordable homeownership.

Impediment: Fair housing enforcement and education is needed.

Recommendations:

- Code enforcement personnel should be trained to maintain communication and status updates with complainants as well as property owners.
- Develop and deliver a fair housing education and training program for elected officials and municipal staff focused on geospatial concepts such as disparate impact and the impact of public infrastructure investments on fair housing choice.
- Organizations offering fair housing education should partner with existing community-based organizations to deliver information in culturally-appropriate ways to non-English speaking communities; education materials should include general information about landlord and tenant responsibilities as well. A “what to do if you’re facing eviction” insert could be helpful.

Hennepin County: The County has taken an active role in engaging the community of North Minneapolis and all of the cities along the blue line corridor before breaking ground with the blue line light rail. The plan now will have minimal impact or harm in displacing households. Further the County has funded studies from the Center of Urban and Regional Affairs and the Carlson School of Management in the University of Minnesota to identify gentrification trends and how to limit displacement. The County also funds with CDBG tenant advocacy in multiple languages through HOME Line.

Minneapolis: Minneapolis: The City has adopted a “Renter First” policy that centers renters in rental licensing enforcement action, including hiring new tenant navigators to help renters resolve problems with building owners and managers. In addition, the City has increased investment to provide legal services to renters facing eviction and to represent low-income renters in habitability cases.

The City provides financial support to Legal Aid and HOME Line to provide free legal services for low-income renters facing eviction. The City support HOME Line’s Tenant Hotline offering free information and legal advice to Minneapolis residents in English, Spanish, Somali and Hmong. In 2018, 3,344 renter households, representing 8,110 Minneapolis renters, contacted HOME Line’s Tenant Hotline, resulting in \$378,000 in damage deposits and rent abatements recovered or saved and 224 evictions prevented.

In 2019, the City increased support for tenant services, providing funding to Mid-Minnesota Legal Aid and Volunteer Lawyers Network to expand legal representation for renters facing eviction. An estimated 320 more renter households will be represented at housing court because of this support.

- Review LEP plans and update as needed to better serve the needs of people of oral-based cultures.
- Designate an ombudsman to specific immigrant communities to be responsible for communication regarding available housing programs and needs.
- Explore partnerships to disseminate fair housing information and resources to undocumented residents through existing organizations.
- Conduct region-wide fair housing testing specifically in the areas of steering and discrimination on the basis of familial status.
- Commit staff resources to efforts to enhance engagement with communities of color regarding available housing programs and needs. Entitlement jurisdictions should be intentional regarding their community outreach to open and maintain lines of communication within communities of color. Consideration should be given to the designation of a specific staff member to facilitate these intentional engagement efforts.

Woodbury: The City has redefined the position of Community Development Coordinator to include liaison responsibilities to intentionally build relationships with the local nonprofit and faith communities.

Minnetonka: Between 2015 and 2017, Minnetonka spent \$3,171 of their allocated CDBG funds on a variety of fair housing activities.

Washington County: The County co-produced ECHO Fair Housing Videos: In collaboration with cities and counties in the Twin Cities Metro, production “A good, safe place to live”. The videos are 5-minute digital shorts in English, Spanish, Somali, Karen & Hmong to help new Minnesota renters understand their rights and responsibilities as tenants. The video provides basic knowledge of the laws that protect them, around discrimination, home safety and potentially predatory landlords. The Council on American-Islamic Relations (CAIR) Minnesota training to CDA staff on Somali and Muslim culture & accommodations.

Dakota County: The ECHO rental fair housing video “A Good, Safe Place to Live” is available on the Dakota County CDA website in five languages that include English, Spanish, Hmong, Somali and Karen. The Dakota County CDA contributed funding to the creation of the videos and continues to market the ECHO rental fair housing video/program. The videos help new Minnesotans understand their rights and responsibilities as tenants, Twin Cities PBS (TPT) program “ECHO” produced a short video in five languages, covering the basics of tenant and landlord rights and obligations. The program “A Good, Safe Place to Live” is available in these languages: Hmong, Karen, Somali, Spanish and basic English. The program was developed in collaboration with more than thirty community and governmental partners, including housing and redevelopment authorities and community development agencies from the seven-county metro area, as well as legal aid organizations, state housing authorities and others. The program premiered statewide on TPT’s Minnesota Channel on April 11, 2016, and is also available on DVD, and online at tpt.org/echo. In addition, a curriculum for English Language Learning classrooms is in development, allowing adult learners to discover more about housing issues while mastering English. Furthermore, ECHO plans to pair its cultural outreach coordinators with educators around the state to help communities absorb this important information.

Dakota County Social Services staff provides and distributes tenant and landlord marketing materials with a clear message about available assistance to resolve housing crises and prevent homelessness. The goal is to have this information provided at lease signing or other interactions between landlords and tenants to encourage them to refer tenants to resources instead of resorting to eviction. The tenant information is in English, Spanish and Somali.

The Dakota County CDA Community and Economic Development Department staff held bi-monthly meetings with the city Community Development Directors. This group has discussed the creation and implementation of local Fair Housing Policies in individual cities.

Saint Paul: The City created the Fair Housing Coordinator position coordinate partnerships with community and city departments, including the Departments of Safety and Inspections, Planning and Economic Development and Human Rights to expand fair housing education citywide. The Department of Safety and Inspections provides Fair Housing Training to all new Certificate of Occupancy holders. The Department of Human Rights and Equal Economic Opportunity provides Fair Housing trainings and information to community and serves as a resource for City staff.

FHIC: The FHIC funded a project completed by Southern Minnesota Regional Legal Services housing discrimination attorneys and staff who partnered with seven local organizations serving immigrant communities and conducted nine fair housing trainings with 169 attendees. The trainings focused on renters’ rights and responsibilities and fair housing law. The trainings were

also highly visual. Additionally, even though the trainings were directed toward the clients of the agencies, the staff of the agencies also received the same information which allows the staff to better assist their clients.

Impediment: Multifaceted values on neighborhoods and housing.

Recommendations:

- Monitor findings related to the Family Housing Fund’s research on pooling vouchers for use in high-opportunity areas as well as its voucher mobility research for MPHA and study applicability for other PHAs.
- Monitor the success of Met Council’s mobility program for strategies that can be adapted or duplicated elsewhere.
- Routinely review PHA subsidy standards and LIHTC QAPs to ensure accommodation of units for large, multigenerational families.

Metropolitan Council: The Met Council HRA reviews subsidy standards each year and awards additional points for Project Based Voucher units that provide housing for large bedroom sizes - 3 or more bedrooms.

Minneapolis: The city prioritizes projects with large family units in both the QAP and Affordable Housing Trust Fund programs.

St. Paul: To encourage the development of 3+ bedroom units, extra points will be awarded to tax credit projects that promote family housing where 25% or more of the units in the project have three or more bedrooms.

Impediment: Regulations and policies impact housing development.

Recommendations:

- Adopt zoning code amendments to either (1) have the definition of “family” more closely correlate to neutral maximum occupancy restrictions found in safety and building codes; (2) increase the number of unrelated persons who may reside together to better allow for nontraditional family types; or (3) create an administrative process that allows for a case-by-case approach to determining whether a group that does not meet the code’s definition of family or housekeeping unit is nonetheless a functionally equivalent family.
- Amend zoning maps to rezone large-lot single-family zones to higher density/ lower minimum lot area standards and allow for infill development or conversion of large single-family dwellings to two-family and triplex units to allow more density on the same footprint or minimum lot size; consider reducing administrative barriers to PUD and cluster development approvals which support affordable housing.
- Amend zoning codes to reflect more flexible and modern lot design standards such as increasing maximum height allowances, increasing minimum density or floor area ratios, increasing maximum floor area ratios (FAR), decreasing minimum parcel sizes, and decreasing minimum livable floor areas of individual dwelling units.
- Consider development incentives such as density bonuses and expedited permitting processes or fee waivers for voluntary inclusion of affordable units or mandatory set asides in cases where local government funding or approvals are provided, should be adopted across all jurisdictions to encourage or require mixed-income, affordable units.

- Review and update zoning codes as necessary for consistency with the state Planning Act regarding manufactured and modular homes. Review conditional permit use criteria and inclusionary zoning provisions to ensure they support and encourage this type of alternative affordable housing.
- Consider allowing reductions in off-street parking requirements where there is a showing that shared parking, bike parking, or access to public transportation reduces the actual need or demand for off-street vehicle parking; consider adopting maximum off-street parking restrictions.
- Consider adoption of an inclusionary zoning ordinance requiring set-asides of affordable housing units especially for developments requiring city funding, site location assistance, or planning approvals.
- Analyze zoning codes in areas not covered by this study for fair housing issues.
- Ranked list of municipalities in QAP should be re-examined for impact on perpetuating concentrations of affordable housing; consider whether other measures of affordable housing need may be more effective.

Plymouth: Plymouth HRA staff continues to have discussions with senior leadership around the following topics: -Considering development incentives such as density bonuses and expedited permitting processes or fee waivers for voluntary inclusion of affordable units or mandatory set asides. -Adoption of an inclusionary zoning ordinance requiring set-asides of affordable housing units, especially for developments requiring city funding, site location assistance, or planning approvals.

St. Paul: The City amended its zoning code to increase housing density in high-use transportation corridors to increase housing development. The City's amended Zoning Code does not impose conditional use permits for supportive housing which is classified as apartments and has increasingly allowed for rezoning for increased building heights; requirements for parkland dedication as a mechanism to ensure adequate park amenities for all residents are reduced for affordable housing developments; Accessory Dwelling units (ADU) are now allowed throughout the city; and the Sustainable Building Regulations Ordinance establishes sustainable building regulations for buildings owned, operated or funded by the City ensuring energy efficiency and sustainability and this lower costs for building owners and tenants. The City Council and Mayor's Office advanced a slate of tenant protection ordinances in March 2020, including: limits on security deposits, tenant screening guidelines, advance notice of sale, just cause notice and rights and responsibilities information. This package is currently awaiting public hearing before moving to a vote.

Washington County: In 2017, Washington County eliminated priority based on location in the Qualified Allocation Plan.

- Update tenant screening policies related to criminal background based on revised HUD guidance issued in 2016.

Minneapolis: Minneapolis adopted a new occupancy ordinance in December of 2019. The previous ordinance restricted family to those who are related by blood or legally (adoption, marriage, domestic partnership). This ordinance also eliminates the maximum occupancy requirements in

each zoning district. The new ordinance removes these restrictions on the definition of family. Also in 2019, Minneapolis eliminated single-family zoning to allow for more density and more construction of affordable housing units. Minneapolis has also decreased off-street parking limits citywide. The Minneapolis City Council adopted a permanent, comprehensive Inclusionary Zoning policy in December 2019 that is now in effect. The policy applies to all new housing development projects in the City with 20 or more units. It will phase in over time for smaller projects (20-49 units) and ownership projects (condos). Developers must include affordable units in their projects or choose a compliance alternative, such as paying an in-lieu fee or producing affordable units off-site. The City is encouraging innovation to increase housing supply and diversity in other ways. In 2019, the City Council approved changes to the zoning code to allow for the development of intentional communities and cluster developments to provide more housing options for residents experiencing housing instability.

The City adopted an ordinance in 2019 that provide increased tenant protections during the screening process. Tenants cannot be denied for misdemeanor convictions older than three years, felony convictions older than seven years, and serious offenses older than ten years, with some exceptions. The ordinance also prohibits the use of a credit score to deny applicants and places a cap on security deposits.

Metropolitan Council: Met Council HRA reviewed and revised selection procedures with a goal of screening families in rather than out.

- Remove or amend residency preferences to better advance regional fair housing choice.

Impediment: Displacement causes a loss of affordable housing.

Recommendations:

- Work toward and advocate local adoption of just cause eviction ordinances.
- Monitor state legislation regarding right of first refusal statutes and develop program to implement locally as appropriate.
- Continue research into gentrification and loss of affordable housing to identify areas where it may be occurring.
- Research available property tax abatement programs and market them to homeowners in areas of increasing displacement.
- Convene dialogue between code enforcement, child welfare agencies, and housing rehabilitation programs to discuss linkages that would provide assistance to tenants living in substandard conditions.

Hennepin County: The County has funded studies from the Center of Urban and Regional Affairs and the Carlson School of Management in the University of Minnesota to identify gentrification trends and how to limit displacement. The County invests in 4D financing, NOAH preservation, and affordable housing development throughout the county. The County works with the Minneapolis Public Housing Authority to continue and grow the Family Unification Program to ensure that families are not separated on the basis of housing and they have access to housing vouchers.

Minneapolis: The City is undertaking a number of anti-displacement strategies, including NOAH preservation, tenant protections and researching new policies that may prevent displacement, such

as a tenant opportunity to purchase ordinance. The City of Minneapolis adopted tenant protection ordinances in 2018 and 2019, including: Advance Notice of Sale and Post-Sale Tenant Protections, and a tenant screening ordinance. The City has invested in NOAH preservation efforts, including a NOAH preservation fund, Small and Medium Multi-Family Loan Program and 4d Affordable Housing Incentive Fund. All of this work is informed by the University of Minnesota Center for Urban and Regional Affairs (CURA) study on gentrification. The City participated in the Anti-Displacement Policy Network cohort, along with St. Paul, through PolicyLink.

Plymouth: Plymouth HRA staff has discussed a variety of displacement-based topics with senior leadership, including just cause eviction ordinances. Staff has also convened dialogues between code enforcement staff, child welfare agencies, and housing rehabilitation programs to discuss potential linkages.

Scott County: The CDA partnered with the U of M to create a uniform inspection checklist to be provided to both landlords and tenants ahead of the County inspections.

St. Paul: The Office of Financial Empowerment focused on addressing the need for tenant protections in 2019 through community engagement and are looking to move a slate of tenant protections ordinances forward in early 2020 including: Specifically, Advance Notice of Sale and Just Cause Notice

The City launched a rent supplement program in partnership with 7 Saint Paul Public Schools to provide a monthly rent subsidy to families with young children at risk of displacement called Families first. The Families First Housing Pilot provides Saint Paul families a \$300.00 monthly rent subsidy and ongoing supportive services for up to three years.

Saint Paul implemented 4d tax incentive to preserve affordable housing units. The 4(d) Affordable Housing Incentive Program offers rental property owners a tax rate reduction and limited grant assistance for units that remain affordable for ten years. The 2020 guidelines expand coverage to single family home rentals.

City staff and elected officials participated in the Anti Displacement Policy Network Cohort through PolicyLink. Minneapolis and St. Paul jointly formed a team to participate in this network to learn about policies other cities around the country are pursuing to combat displacement and to advance anti-displacement policies here in the Twin Cities.

FHIC: The Housing Justice Center (HJC) was awarded funds from the FHIC in program year 2017. HJC researched and identified strategies to minimize and mitigate resident displacement from affordable housing. A final report, Local Strategies for Housing Choice and Stability, has been completed and has been distributed and discussed around the area during program year 2018.

Impediment: Distribution of affordable housing.

Recommendations:

- Increase funding for affordable housing; work with marketing firm to develop a campaign that raises awareness among the public about housing affordability and connects the issue

to education, jobs, and other infrastructure. Campaign should build political will, counter NIMBYism, and include an appeal to philanthropies for funding.

- Support NOAH Fund, publish success stories, market to susceptible property owners, increase capitalization and funding sources.
- Develop and implement an ongoing campaign to encourage more landlords to accept HCVs, especially in suburban communities.

Metropolitan Council: The Met Council hired an outreach coordinator whose primary focus is landlord engagement and recruitment, fostering landlord/tenant relationships, and assisting with housing searches. In conjunction with the MN Multi-Housing Association, the two groups have built connections with local landlords and hold regular briefings and workshops to educate landlords about the Section 8 program.

- Require comprehensive plans to describe how they plan to meet affordable housing need, not just guide the land for it.
- Maintain local LIHTC database as a tool for studying trends over time in the development of tax credit projects.
- Analyze the MN Challenge recommendations related to reducing the cost of affordable housing for feasibility at the local level; implement as appropriate.
- In areas where 4% credits have become competitive, attach additional criteria to review processes to better direct projects toward strategic ends (i.e. preservation focus or location of new units in areas of opportunity).
- Prioritize rehabilitation and preservation of existing affordable housing in areas where displacement is known to be occurring.

Plymouth: Since 2015, Plymouth has provided 35 home rehabilitation loans and 11 emergency repair grants to income-eligible households that have helped residents remain in their home. City staff has also continued to engage in outreach efforts with landlords to expand acceptance of HCVs, especially for those multifamily housing properties using public funds. Finally, staff monitors for compliance on at least an annual basis.

Washington County: Through its owner-occupied rehabilitation loan program Washington County has issued 73 loans to homeowners at or below 80% area median income since 2012. Washington County is also a loan administrator for MN Housing's rehabilitation and emergency loan programs.

Woodbury: The Woodbury HRA combined two existing loan programs in to the new Neighborhood Reinvestment Fund, which provides for greater access to capital for rehabilitation of owner-occupied housing stock in the community with income maximums indexed to 125% of the Woodbury median household income.

Dakota County: Since 2015, Dakota County has provided home rehabilitation loans to 296 households. The Dakota County CDA holds monthly landlord/owner workshops about the HCV Program for rental property owners and landlords that provide tools, tips and information on requirements and policies. Fair housing information is also included. All Dakota County CDA activities that may affect an owner's ability to lease a unit will be processed as rapidly as possible, in order to minimize vacancy losses for owners. The CDA holds an annual owners' conference to discuss any program changes and new topics as well as provide an opportunity for owners to ask

questions, obtain written materials and meet program staff. The CDA provides owners with a handbook that explains the program, including HUD and CDA policies and procedures, in easy-to-understand language. The CDA gives special attention to helping new owners succeed through activities such as:

- The CDA requires first-time owners (or their agents) to participate in a briefing session on HAP contract requirements.
- Provides the owner with a designated CDA contact person.
- Provides other written information about how the program operates, including answers to frequently asked questions.
- Provides program information as well as frequently used forms on the CDA Website.

The Dakota County CDA Housing Finance Policy includes the requirement for housing projects financed with private activity bonds, 501(c)(3) bonds, refunding bonds, Low Income Housing Tax Credits, Tax Increment Financing and HOPE funds (a local gap financing source) to participate in the Section 8 Program (aka HCV). The developer is required to sign an agreement that while the bonds/loan/agreement are outstanding, they will not exclude from consideration qualified families receiving assistance from the Section 8 program.

Hennepin County: The County invested the first \$3 million in the regional NOAH fund, and invested \$2 million in the second phase of this fund. The County also created a Supportive Housing Strategy, which awarded \$6 million in its first year to fund 212 units of supportive housing affordable to households with extremely low incomes. The County increased its local Affordable Housing Incentive Fund to \$5.5 million in 2020, and pairs this fund with HOME and CDBG to focus funds at housing affordable to households with the lowest incomes. Overall, the county creates or preserves almost 1,000 units of affordable housing. Since 2015, Hennepin County has provided over 90 home rehabilitation loans to low or moderate- income households.

Minneapolis: The City has long invested in the production and preservation of affordable rental housing with subsidies that have income and long-term affordability requirements. Increased City investment in affordable rental housing is setting records for new production and expanding our ability to serve the lowest income City residents. The Affordable Housing Trust Fund is one of the City's primary tools to preserve and produce new affordable rental housing. The AHTF provides financing to help close the gap between the cost of decent, safe housing and the amount of rent that low-income residents can afford. In 2019, the City invested an historic \$20 million in the Affordable Housing Trust Fund, which will preserve and produce more than 1,000 units of rental housing.

The City has created three programs to address NOAH preservation. The programs include tools for preservation buyers to purchase NOAH properties and incentives for existing owners to maintain affordable rents.

- NOAH Preservation Fund: Launched in 2017, this program helps nonprofit housing providers acquire larger NOAH properties or portfolios of typically 75 or more units to preserve affordability, address housing quality improvement needs, and prevent displacement.
- Small and Medium Multifamily Loan Program (SMMF): A partnership between the City, the Land Bank Twin Cities, Inc. and Twin Cities Local Initiatives Support Corporation

(LISC), this program acquires small to medium-size multifamily buildings with 2–49 units in need of housing quality improvements. The Land Bank acquires properties with funding from both the City and LISC, makes housing quality improvements, stabilizes the property operations and develops a long-term disposition strategy. Program guidelines prioritize disposition to support community-based ownership, including sales to community-based nonprofit organizations, housing providers with historic ties to the neighborhood and/or tenant cooperatives. The SMMF was launched in mid-2018 and its guidelines were revised in May 2019.

- 4d Affordable Housing Incentive Program: The City created this program to offer a lower property tax rate to owners of NOAH properties if they agree to maintain affordable rents for 10 years and to reserve all vacancies throughout the 10-year period for low- and moderate-income households. Owners of unsubsidized multifamily properties with two or more units are eligible to apply, as long as at least 20% of the property’s rental units are affordable to households making 60% of the area median income(AMI). Participating property owners agree to limit annual rent increases affecting tenants to 6% or lower per year. In addition to reduced property taxes, participating property owners are eligible for free or low-cost energy assessments and City cost sharing for solar energy installations and energy efficiency improvements.

Eden Prairie: From 2015-2017, the City provided 28 home rehabilitation loans.

Minnetonka: The City provided 47 home rehabilitation loans from 2015-2017.

Saint Paul: The City Council passed resolution 18-1204, calling for action to create and preserve housing that is affordable at all income levels; address racial, social and economic disparities in housing; create infrastructure needed to stabilize housing; fund an Affordable Housing Trust Fund; and continue to fund down payment assistance for first-time homebuyers. This resolution is a public acknowledgement that housing, especially affordable housing, is a priority for the city. The 2040 Comprehensive Plan also supports affordable housing development. Policy H-32 states “Continue to use City/HRA resources to support affordable rental housing citywide with at least 30 percent of the total rental units (both market-rate and affordable) financially assisted by the City/HRA being affordable to households earning 60 percent or less of AMI with at least: 10% of all units being affordable to households earning 30% of AMI; 10% of all units being affordable to households earning 50% of AMI; and 10% of all units being affordable to households earning 60% of AMI.

The City also implemented 4d tax incentive to preserve affordable housing units. The 4(d) Affordable Housing Incentive Program offers rental property owners a tax rate reduction and limited grant assistance for units that remain affordable for ten years. The 2020 guidelines expand coverage to single-family home rentals.

Impediment: Segregation & disparate access to opportunity.

Recommendations:

- Met Council should develop the capacity to resource local government staff for fair housing planning.

- Integrate Met Council’s housing performance scores into county CDBG subrecipient funding processes; study feasibility of integrating scores into prioritization of park and library funding

Impediment: Concentrated poverty requires place-based investment.

Recommendations:

- Explore options for amplifying community voices in local planning decisions. Plan to include non-English speakers, and those of oral traditions.
- Consolidated Plans should be place-based, focusing available funding on improving opportunity in high-poverty areas.
- Review capital improvement planning models to ensure process is guided by data on concentrated poverty and areas of low opportunity.
- Maintain data on the racial and ethnic composition of local elected and appointed boards and commissions.

Hennepin County: During the Five-Year Consolidated Planning period for 2020 to 2025 Hennepin County utilized technology to engage communities through an internet-based survey that was accessible in multiple languages. There have been several community meetings that took place in several cities in the county. The planning process has been the most involved process Hennepin County has ever taken in gathering community input. Hennepin County has also prioritized the survey respondents who were people of color or indigenous and those of low to moderate income. The County isolated those responses and weighted them heavily compared to the general population. Also, now the County has the most diverse County Board in its 150 + year history.

Minneapolis: As part of the Minneapolis2040 Consolidated Planning process, the City has developed extensive community engagement strategies to ensure that a variety of voices are heard. The steps taken included providing childcare, ADA accessibility, offering a variety of times, methods and locations of engagement, and offering translation of materials and presentations in a variety of languages. The City of Minneapolis created a new Advisory Committee on Housing to advise the Mayor, Council and City departments on matters related to housing policy. In addition, the City Council adopted a Strategic and Racial Equity Action Plan that identifies a goal of Improving the capacity of appointed boards and commissions (ABCs) to advance the City's racial equity work.

FHIC: For program year 2018 the FHIC awarded Equity In Place (EIP) funds to incorporate and support the recommendations from the AI Addendum. EIP performed work in the suburban jurisdictions to engage underrepresented racial, ethnic, and other protected class communities around the following activities to incorporate and support the recommendations from the AI Addendum (Goal 7):

- Educated individuals on their fair housing rights;
- Explained how government processes impact them and how to be a part of these decision-making processes to further fair housing;
- Worked with underrepresented protected classes to identify strategies to address the fair housing challenges they face;
- Connected community members with decision-makers to further fair housing in the jurisdiction; and

- Worked with fellow grantees around shared fair housing issues.

Discuss how you have been successful in achieving past goals, and/or how you have fallen short of achieving those goals (including potentially harmful unintended consequences).

Hennepin County: Hennepin County has made strategic investments to impact equitable affordable housing development, investing in 1000 units of affordable housing annually. Greatest investments are made in housing affordable to people below 30% of the area median income, as that is where the greatest housing cost burden, overcrowding, and racial disparities occur.

For households with incomes below 30% of the area median income, the County:

- Increased the portion of County-financed housing units affordable to households with extremely low incomes from 18%-25%.
- Created a Supportive Housing Strategy, which awarded \$6 million in its first year to fund 212 units of supportive housing to those with extremely low incomes.
- Prioritized households with extremely low incomes for emergency housing assistance funded through CDBG.

For households with incomes below 50% of the area median income, the County:

- Increased its local Affordable Housing Incentive Fund to \$5.5 million in 2020
- Invests heavily in the land trust model of homeownership, including a new pilot program focused on Black homebuyers.

For households with incomes below 80% of the area median income, the County:

- Invested \$2 million in the second phase of the NOAH Impact Fund
- Provides financial assistance to repair about 160 owned homes each year
- Funds homebuyer down payment assistance, including a pilot program aimed at impacting racial disparities in homeownership.

Minneapolis: The City of Minneapolis has undertaken significant activity around affordable and fair housing goals. The City has adopted or is working on ordinances identified in the previous set of recommendations, including but not limited to: a local source of income protection (currently enjoined pending litigation), changing the definition of “family” in the zoning code, changed the code to allow Accessory Dwelling Units and adopting a permanent inclusionary zoning policy. The City has significantly increased funding for affordable housing development, including preservation of naturally occurring affordable housing and new production for households earning less than 50% of Area Median Income. The City prioritizes projects with large family units in both its QAP and Affordable Housing Trust Fund program. The City has adopted a “Renter First” policy that centers renters in rental licensing enforcement action, including hiring new tenant navigators to help renters resolve problems with building owners and managers. In addition, the City has increased investment to provide legal services to renters facing eviction and to represent low-income renters in habitability cases. The City has used its Consolidated Plan resources to implement place-based strategies with Promise Zone and Opportunity Zone marketing and investments, employment and business programming focused on geographies requiring intervention, and local policies tying localized infrastructure improvements with community and economic development goals. The City has taken steps to reduce the cost of developing affordable housing, including zoning text code amendment to allow triplexes, parking reductions, and the ADU ordinance. The City is undertaking other anti-displacement strategies, including NOAH

preservation, tenant protections and researching new policies that may prevent displacement, such as a tenant opportunity to purchase ordinance.

Saint Paul: The City remains committed to advancing fair housing with an emphasis on racial equity and economic justice through collaborations with the community, city departments, and elected officials. In 2018, the City created and funded its Housing Trust Fund, with a total investment of \$16,000,000.00. The objectives for St. Paul's housing trust fund strategy are as follows:

- Meet the needs of those with the lowest incomes by increasing supply. The lowest income residents in St. Paul are the most cost-burdened and have the fewest existing housing options.
- Invest in low and moderate-income residents by investing in the existing supply. Maintaining the housing options that are already serving low and moderate-income families will ensure the City does not lose ground on increasing the supply, and will prevent displacement.
- Explore innovative approaches to meeting housing needs. Piloting programs and options to produce affordable opportunities more efficiently will allow more residents to be served.
- Build wealth for residents and communities. Targeting housing investments in ways that increase affordability and the resources available to low-income residents and communities.
- Promote fair access to housing for all of us. Expanding tenant protections, landlord training, and coordination among City departments to ensure fair access to housing and displacement prevention.

In 2019, the City formed a new Office of Financial Empowerment (OFE), including a full-time Fair Housing Coordinator position who works with several city departments and residents as well as with the regional Fair Housing Implementation Committee to establish policies, regulations, and programs to proactively ensure that Saint Paul residents do not experience housing discrimination and to affirmatively further fair housing. The Office of Financial Empowerment developed a framework for the Fair Housing strategy with overarching goals of decreasing housing displacement, increasing housing access and focusing on Affirmatively Furthering Fair Housing. To achieve these goals, the citywide fair housing strategy will align community and department work in four core areas: Preservation and Production, Education and Engagement, Enforcement and Compliance and Tenant Protections. In 2019, OFE focused on Tenant Protections, hosting a series of community engagement events to identify strategies and policy priorities. In 2020, the City will introduce S.A.F.E. Housing St. Paul, a suite of tenant protections policies geared at ensuring stable, accessible, fair and equitable housing opportunities for all.

Additionally, the City is working toward decreasing displacement, increasing access and affirmatively furthering fair housing through several strategies, including:

- Increased Tenant Protections
- 4D Tax Incentive
- Down Payment Assistance
- Rent Supplement Pilot (Families First)

- Inclusionary Zoning Study
- Definition of “family” Study
- Community Land trust Pilot
- Returning Home Saint Paul Pilot (Access fund and services for persons with criminal history)
- Neighbors Helping Neighbors (a VISTA led volunteer initiative to aid low income residents with minor water leaks and nuisance abatement that can cause housing instability through fees and excess costs)

Washington County: Washington County and Washington County CDA have worked together to achieve fair housing goals and continue to collaborate on projects that affirmatively further fair housing and expand the available, accessible and affordable housing supply. Strides have been made to address the impediments found in the 2014 Analysis of Impediments and the Addendum recommendations. Washington County and the CDA will continue to collaborate with developers, landlords, elected officials, educators, businesses and citizens in the effort to incorporate AFFH practices.

Dakota County: The Dakota County CDA has worked hard to make the Housing Choice Voucher program more accessible to those in need of housing assistance as well improving landlord/property owner outreach and education. The Dakota County CDA also strives to reach deeper into minority and Hispanic households with their homebuyer programs than the overall County demographics, but presently the Dakota County CDA is looking to ensure their homebuyer programs are at least as representative as the County as a whole.

- b. Discuss any additional policies, actions, or steps that you could take to achieve past goals, or mitigate the problems you have experienced.*

Hennepin County: The County continues to focus new, deeper investments in housing affordable to households with the lowest incomes. Additionally, the County plans to take action investing in informing tenants and renters of their rights and responsibilities and promoting inclusive tenant selection plans. Looking to the next five years, it will be important for the County to identify goals that are achievable and can be measured. In this way, the County can fully identify steps to address these issues in a practical and strategic manner.

- c. Discuss how the experience of program participant(s) with past goals has influenced the selection of current goals.*

Several of the jurisdictions have made extensive changes to local policies that address the impediments identified in the 2014 Analysis of Impediments to Fair Housing Choice. The goals included in this current Analysis of Impediments were selected based on areas that were not fully executed from the 2014 AI, areas that were not explicitly covered in the 2014 AI, and areas where significant improvement can still be made by jurisdictions in addressing local impediments.