City of Duluth Minnesota

FY 2021 ACTION PLAN

Consolidated Plan for Housing and Community Development FY 2020 – 2024

FY 2021 Action Plan: Consolidated Plan for Housing and Community Development FY 2020 - 2024 for the City of Duluth, Minnesota

Community Development Committee (CD Committee)

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1974 as amended.

Executive Summary

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

1. Introduction

The City of Duluth expects to receive about \$3,000,000 in funds from the U.S. Department of Housing and Urban Development (HUD). HUD provides three types of funds: Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), and Emergency Solutions Grant (ESG). CDBG funds support community development projects including affordable housing, public services, public facilities, and economic development. HOME funds support programs that create affordable housing for low-income households. ESG funds support projects that offer basic needs and housing stabilization services to community members experiencing or at risk of experiencing homelessness. Local organizations apply to the Community Development Program requesting these HUD funds for their projects.

The CD Committee reviews the applications and recommends funding amounts for the Community Development Program. The CD Committee holds public input sessions and comment periods regarding the funding recommendations and then make its final funding recommendations to the City Council.

2. Summarize the objectives and outcomes identified in the Plan

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

Themes were developed from community input.

Theme #1: Ensure all residents have access to necessary transportation and utility infrastructure.

Priorities include:

• Improve streets and sidewalks, and address snow clearing, in ways that do not increase cost burdens on low-income property owners. Support multimodal transportation by improving access to transit, and adding transit amenities such as bus shelters and street lights. Invest in pedestrian and bicycle infrastructure, and implement ADA improvements in targeted areas.

Provide reasonable access to clean energy and improve energy efficiency to relieve energy burdens.

Theme #2: Increase the supply of affordable, quality housing.

Priorities include:

Provide housing cost assistance to alleviate cost burdens. Increase the number of housing units
in locations that are convenient for access to jobs and food. Provide a variety of unit types at all
levels of affordability, aiming for mixed-income neighborhoods. Housing types to focus on
include supportive housing, accessible housing, units for individuals, and senior housing.
Improve quality and safety of housing, including enforcement of existing codes and rehab of
older structures.

Theme #3: Support thriving neighborhoods by addressing neighborhood issues and improving aesthetics.

Priorities include:

 Identify solutions to homes that are condemned or vacant, in order to address neighborhood blight. Ensure neighborhoods have key amenities such as quality lighting, street trees, and public art.Collaborate with the police department, neighborhood groups, and others to ensure neighborhood safety. Increase waste receptacles and sharps containers in parks and public facilities.

Theme #4: Build employment skills and opportunities.

Priorities include:

 Provide job training for low- and moderate-income individuals. Build the capacity of contractors in order to provide skilled jobs and meet housing development needs. Use economic development strategies to increase living wage jobs.

Theme #5: Support health and well-being.

Priorities include:

• Ensure health care access. Provide connections to recreation activities that promote physical and mental well-being. Eliminate food deserts and expand food access. Provide chemical dependency and mental health treatment, with a particular need for residential treatment.

3. Evaluation of past performance

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

Each program that is funded with CDBG, HOME and ESG funding is monitored annually to make sure that the number of people who were going to be served for a specific need were met. If not, then that program is evaluated to determine if the need for that the program is still a priority or if that need is being met elsewhere due to other new funding sources or if the community dynamics have changed and the demand for a specific need has decreased. Every year, there are public input sessions to gather input on community needs to evaluate if a need should be a goal for this plan. A description of the goals and a description of the public input process is provided in the annual action plan, which is submitted to HUD for review and approval.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

The citizen participation process is outlined in the Citizen Participation Plan and was integral in goal-setting and developing strategies in the plan. The City used a combination of public hearing, newspaper outreach, social media, and an online survey to identify needs in Duluth. The Citizen Participation Plan lists out the public process that the Planning & Development Division utilizes throughout the year. The plan includes the process for the development of the Action Plan. The Citizen Participation Plan can be found online at: https://duluthmn.gov/planning-development

As part of the community outreach process, the City Planning & Development Division staff used multiple outreach strategies to engage community members and the organizations that serve our community. Division staff consulted with nonprofit and service providers who work on issues of healthcare, housing, homelessness, and education, and other community issues. An online survey was held from September 4 to September 15, 2020; along with a Community Input Session on September 22, 2021.

The Planning & Development Division published the annual Housing Indicator Report, which is an analysis of the housing market in Duluth.

The Community Development Committee reviews the draft Action Plans and funding recommendations at public meeting. These documents are made available for 30-day public comment period from December 18, 2020 to January 19, 2021. All public comment received during the comment periods and at the meeting was presented to the CD Committee and is referenced in the minutes. The CD Committee held their public input session on the draft Action Plan recommendations on January 5, 2021.

5. Summary of public comments

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

All of the comments received during the public comment period and at the Community Development Committee meetings are referenced in the meeting summary from the public hearings.

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

The comments were related to funding requests, which will be considered.

7. Summary

The Annual Action Plan, one of five annual plans, outlines how the federal Community Development resources will be allocated in FY 2021. Each year after that an Annual Plan will be completed to communicate how these funds will be allocated to meet the objectives identified in the Consolidated Plan.

The Annual Action Plans will also include a section that evaluates the community's performance towards meeting the objectives outlined in the Consolidated Plan, meaning how well we are achieving progress towards the priority needs of the City of Duluth.

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

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

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency		
CDBG Administrator	DULUTH	Planning and Development Division		
HOME Administrator	DULUTH	Planning and Development Division		
ESG Administrator	DULUTH	Planning and Development Division		

Table 1 – Responsible Agencies

Narrative (optional)

On behalf of the City of Duluth, the Planning and Development Division within the Department of Planning and Economic Development is the lead agency responsible for formulating plans and strategies for housing and community development efforts. The Division is directly responsible for administering and developing the Consolidated Plan, which outlines the community's goals and investment strategies for the Community Development Block Grant (CDBG) Program, HOME Investment Partnerships Program (HOME) and Emergency Solution Grant Program (ESGP). Also, the Planning and Development Division works with other City departments, the Housing and Redevelopment Authority of Duluth (HRA), neighborhood and citywide non-profit groups to implement the Community Development program

Consolidated Plan Public Contact Information

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

1. Introduction

The City of Duluth is dedicated to developing a Consolidated Plan that is effective in meeting the needs of low income & moderate income people within the city. The Planning and Development Division spent nine months developing this plan which included outreach to the public and a variety of stakeholders.

An advisory group of citizens assists with reviewing community development strategies by providing direct citizen input into the planning and prioritization process. That group is the Community Development Committee (CD Committee). The CD Committee is made up of nine communitywide representatives. The CD Committee is advisory to the City Administration and the City Council.

The participation process for the Community Development Program is detailed in the City of Duluth Citizen Participation Plan, 2019 publication. In general terms, the process consists of two tiers. The CD Committee helps to provide community perspectives on the Community Development Program and oversee the funding process. Secondly, the city uses a public hearing and community needs survey.

The Planning and Development Division, as the lead entity, strives to involve many partners in addressing community development needs and issues. There are many other participants involved with housing and community development issues and programs in Duluth. As the lead agency, the Division strives to achieve close cooperation among these other entities.

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(I))

The Planning and Development Division works closely with the Housing and Redevelopment Authority of Duluth (Duluth HRA) which is the local public housing administrator for Duluth. The City participates in a group called the Affordable Housing Coalition, which is made up of numerous agencies in Duluth that provide housing and homeless services and programs to those in need. This group meets regularly to discuss issues and gaps in service, as well as, works to develop strategies to assist those in need of housing assistance and other needs. This group is comprised of City and County officials, as well as housing agencies: Duluth HRA, One Roof Community Housing and Ecolibrium3, as well as supportive housing providers: Salvation Army, Center City Housing, Loaves and Fishes, Life House, Lutheran Social Services, MACV; and homeless shelters: CHUM and Safe Haven, and service providers such as Human Development Center, Damiano, American Indian Community Housing Organization, Community Action Duluth. City staff attends these meetings with the St. Louis County Public Health and Human Services staff.

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.

The City of Duluth is located in the St. Louis County Continuum of Care (COC). The City of Duluth has a very interactive role with the COC, in reviewing the community needs for the whole populations as well as the sub populations and using this information in developing a priorization process based on the annual needs and current data and performance measures to align the funding to best address the needs of homeless persons and persons at risk. The City is also actively works with the COC to implement the 2018 St. Louis County Five-Year Plan to End Homelessness.

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 City of Duluth continues to work closely with the St. Louis Continuum of Care (CoC) on providing the ESG guidance which contains specific protocols for prioritizing services to eligible households. As part of the CoC several committees have been developed that have representation from the City, County, service providers, and clients. These committees and their duties are as follows.

Heading Home St. Louis County Leadership Council- Establishes annual targets through strategic planning, decides final funding and reallocation, review and ranks projects, and monitors program performances.

Data/HMIS Committee- Regularly review system level data and identify additional internal and external data sources. Oversees and monitors HMIS data collection and data quality and resolve any issues between provider (s) and Data Collection.

Evaluation and Planning Committee – Reviews the annual Point in Time Count, performance measures, HMIS data, and City and County ESG annual reports (CAPERS) and makes recommendations to the leadership council and identify strategies not yet in place, revisit and update the objective achievements and plan of action.

Other ad-hoc workgroups have been created to address Coordinated Entry, communication of priorities, and prevention targeting.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities

Table 2 – Agencies, groups, organizations who participated

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

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		

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

AP-12 Participation – 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

The citizen participation process is outlined in the Citizen Participation Plan and was integral in goal-setting and developing strategies in the plan. The City used a combination of public hearing, newspaper outreach, social media, and an online survey to identify needs in Duluth. The Citizen Participation Plan lists out the public process that the Planning & Development Division utilizes throughout the year. The plan includes the process for the development of the Action Plan. The Citizen Participation Plan can be found online at: https://duluthmn.gov/planning-development

As part of the community outreach process, the City Planning & Development Division staff used multiple outreach strategies to engage community members and the organizations that serve our community. Division staff consulted with nonprofit and service providers who work on issues of healthcare, housing, homelessness, and education, and other community issues. An online survey was helod from September 4 to September 15, 2020; along with a Community Input Session on September 22, 2021.

The Planning & Development Division published the annual Housing Indicator Report, which is an analysis of the housing market in Duluth.

The Community Development Committee reviews the draft Action Plans and funding recommendations at public meeting. These documents are made available for 30-day public comment period from December 18, 2020 to January 19, 2021. All public comment received during the comment periods and at the meeting was presented to the CD Committee and is referenced in the minutes. The CD Committee held their public input session on the draft Action Plan recommendations on January 5, 2021.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Meeting	Minorities Non- targeted/broad community Residents of Public and Assisted Housing	On September 22, 2020 Virtual meeting where people were able to present ideas	jobs, digital needs	all comments accepted	

	2	Internet Outreach	Minorities Non- targeted/broad community	A community on-line survey. The City worked with agencies to increase outreach with minorities and people who are low income.	respondents 18% of respondents are Black, Indigenous, or People of Color (BIPOC); 70% white 72% of respondents are women; 19% men, 3% nonbinary 57% of respondents are 30-49 years old; age range of respondents 18-7941% to 57% of survey respondents live in HUD defined LMI areas 36% of respondents struggled with at least one of the following in the last year: meet basic needs, maintain stable housing, or access medical care 25% of respondents cannot afford to pay for	all comments were accepted	
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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)
				their basic needs (including food, clothing, health care, transportation, childcare, and housing) with just their household members income(s)	and reasons	
3	Newspaper Ad	Non- targeted/broad community	Newspaper Public Notice in the local paper providing the Action Plan recommendations and options to provide comment.	members meome(s)	All comments were accepted	
4	Internet Outreach	Minorities Non- targeted/broad community	Public Notice on-line and on Facebook providing the Action Plan recommendations and options to provide comment.		All comments were accepted	

Table 4 – Citizen Participation Outreach

Expected Resources

AP-15 Expected Resources – 91.220(c)(1,2)

Introduction

The City of Duluth expects to receive nearly \$3,000,000 in funds from the Department of Housing and Urban Development (including CDBG, HOME, and ESG). The city has prioritized projects and activities in this plan and will work to disperse the funds to meet the goals and objectives identified.

Anticipated Resources

Program	Source	Uses of Funds	Expe	cted Amour	nt Available Ye	ear 1	Expected Narrative Description		
	of Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	2,426,000	250,000	4,303,025	6,979,025	7,278,000	Prior Year Resources include CARES Funding (CV)Program Income from Revolving Loan Fund, which is utilized for housing rehabilitation loans. Reprogrammed funds are being used to address current priorities.	

Program	Source	Uses of Funds	Expe	cted Amou	nt Available Yo	ear 1	Expected	Narrative Description	
	of Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$		
HOME	public -	Acquisition						No program income. Funds have been	
	federal	Homebuyer						allocated.	
		assistance							
		Homeowner							
		rehab							
		Multifamily rental							
		new construction							
		Multifamily rental							
		rehab							
		New construction							
		for ownership							
		TBRA	549,000	0	638,054	1,187,054	1,647,000		

Program	Source	Uses of Funds	Expe	cted Amou	nt Available Y	ear 1	Expected	Narrative Description
	of Funds		Annual	Program	Prior Year	Total:	Amount	
			Allocation:	Income:	Resources:	\$	Available	
			\$	\$	Ş		Remainder	
							of ConPlan \$	
ESG	public -	Conversion and						Prior Year Resources include CARES
	federal	rehab for						funding. No Program Income. Funds
		transitional						have been allocated.
		housing						
		Financial						
		Assistance						
		Overnight shelter						
		Rapid re-housing						
		(rental assistance)						
		Rental Assistance						
		Services						
		Transitional						
		housing	208,000	0	883,151	1,091,151	624,000	

Table 5 - Expected Resources - Priority Table

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

CDBG, HOME, and ESG funds will help to leverage over \$20,000,000 annually (\$100,000,000 over the 5-year plan) of other federal, state, and local funds. Matching requirements have been regularly met and the city does not anticipate having difficulty in satisfying these requirements.

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

Although not already identified, publically owned land is always considered as a way to reduce costs for new housing developments. The city of Duluth regularly considers using tax forfeited properties that Saint Louis County manages. These lands range from homes that are in need of rehab, to severely damaged/condemned buildings, to open lots. Often the city attempts to work with the county to remove the blighted structures and redevelop the land.

Discussion

The City continues to work with area funders, federal, state, and local funders to be able to leverage the federal funds that are received. While local private Foundations experienced a period of reduced funding availability, projections show those amounts to increase. Individual organizations and collaborations have improved at seeking out new and alternative funding sources, in order to maintain service levels within the city. The city also continues to encourage cost-saving-collaborations within the housing, public service, and economic development areas.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort	Goal Name	Start	End	Category	Geographic	Needs Addressed	Funding	Goal Outcome Indicator
Order		Year	Year		Area			
1	Affordable	2020	2025	Affordable		Affordable Housing	CDBG:	Rental units constructed: 0
	Housing			Housing			\$881,000	Household Housing Unit
							HOME:	Rental units rehabilitated: 40
							\$403,476	Household Housing Unit
								Homeowner Housing Added: 2
								Household Housing Unit
								Homeowner Housing Rehabilitated:
								99 Household Housing Unit
2	Neighborhood	2020	2025	Non-Housing		Community	CDBG:	Public Facility or Infrastructure
	Revitalization			Community		Development	\$273,000	Activities other than Low/Moderate
				Development		Public Facilities		Income Housing Benefit: 5986
						Non-Homeless		Persons Assisted
						Need		Public service activities other than
						Neighborhood		Low/Moderate Income Housing
						Improvement and		Benefit: 75 Persons Assisted
						Safety		Buildings Demolished: 7 Buildings
3	Increase Incomes	2020	2025	Non-Housing		Economic	CDBG:	Jobs created/retained: 190 Jobs
				Community		Development	\$240,000	
				Development				

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Create Living	2020	2025	Non-Housing		Economic	CDBG:	Businesses assisted: 48 Businesses
	Wage Jobs			Community		Development	\$139,000	Assisted
				Development				
5	Childcare Access	2020	2024	Non-Housing		Non-Homeless	CDBG:	Public service activities other than
				Community		Need	\$62,000	Low/Moderate Income Housing
				Development				Benefit: 120 Persons Assisted
6	Food Access	2020	2024	Non-Housing		Non-Homeless	CDBG:	Public service activities other than
				Community		Need	\$112,250	Low/Moderate Income Housing
				Development		Homelessness		Benefit: 15625 Persons Assisted
7	Public Services	2020	2025	Homeless		Public Services	CDBG:	Public service activities other than
				Non-Housing			\$22,000	Low/Moderate Income Housing
				Community				Benefit: 1225 Persons Assisted
				Development				
8	Homelessness	2020	2025	Homeless		Homelessness	CDBG:	Public service activities for
							\$363,900	Low/Moderate Income Housing
							HOME:	Benefit: 3562 Households Assisted
							\$90,624	Tenant-based rental assistance /
							ESG:	Rapid Rehousing: 69 Households
							\$192,400	Assisted
								Homeless Person Overnight Shelter:
								1720 Persons Assisted
								Homelessness Prevention: 50
								Persons Assisted
								Other: 406 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
9	Staff	2020	2025	Affordable		Non-Homeless	CDBG:	Other: 1 Other
	Administration			Housing		Need	\$485,200	
				Public Housing		Economic	HOME:	
				Homeless		Development	\$54,900	
				Non-Homeless		Neighborhood	ESG:	
				Special Needs		Improvement and	\$15,600	
				Non-Housing		Safety		
				Community		Homelessness		
				Development		Affordable Housing		
10	Health Services	2020	2025	Non-Housing		Neighborhood	CDBG:	Public Facility or Infrastructure
				Community		Improvement and	\$43,000	Activities other than Low/Moderate
				Development		Safety		Income Housing Benefit: 20000
								Persons Assisted

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Affordable Housing
	Goal Description	CDBG funds will be used to provide rehab dollars for 127 units. HOME funds will be used to provide rehab for 12 units and construct 2 units.
2	Goal Name	Neighborhood Revitalization
	Goal Description	Funding will be used for blight removal, improving a facility that provides housing and child care to LMI mothers, and investing in a neighborhood facility located centrally in a LMI neighborhood that will sell food and products.

3 Goal Name Increase Incomes		Increase Incomes
	Goal Description	Two employment programs will provide training that will allow LMI people to achieve livage wage jobs.
4	4 Goal Name Create Living Wage Jobs	
	Goal Description	Two programs will work different LMI business owners to increase revenue and available of jobs.
5	Goal Name	Childcare Access
	Goal Description	CDBG funds will be used to assist agencies in providing child care for LMI families.
6	Goal Name	Food Access
	Goal Description	Funding will be used to provide meals to at least 15,625 very low income people, some of whom may be experiencing homelessness.
7	7 Goal Name Public Services	
	Goal Description	Funding will be used to assist LMI households in increasing their household income.
8	8 Goal Name Homelessness	
	Goal Description	CDBG, HOME and ESG funding will be used to assist people who are either experiencing or have recently experienced homeless.
9	Goal Name	Staff Administration
	Goal Description	Staff Administration of the CBDG, HOME, and ESG Programs
10	Goal Name	Health Services
	Goal Description	Funding will be used to purchase new equipment and upgrades for a health center clinic that provides care to LMI individuals

Projects

AP-35 Projects - 91.220(d)

Introduction

The city relies mostly upon non-profit and neighborhood organizations to carry out the goals of the Consolidated Plan and Annual Action Plans each year. Through an open application process the City of Duluth reviews and evaluates applications as to how they fit in with the plans. Projects are then funded and the city oversees progress to make sure the goals and objectives of the city are being met.

Projects

#	Project Name	
1	Housing Rehab 2021	
2	Acquisition-Rehab-Resale- CDBG and HOME 2021	
3	Spirit Valley Updates and Efficiencies 2021	
4	Acquisition Demolition Program 2021	
5	Equipment Upgrades to Improve Care -2021	
6	Niiwin Indigenous Foods Market Construction 2021	
7	Job Training Programs- 2021	
8	Business Assistance Workshops 2021	
9	Public Services-General 2021	
10	Public Services-Childcare 2021	
11	Public Services-Food Access 2021	
12	Public Services-Rental Services 2021	
13	Public Services-Housing Supports 2021	
14	Public Services-Shelter 2021	
15 Coordinate Entry 2021		
16	Tenant Based Rental Assistance 2021	
17	Community Land Trust: New Construction 2021	
18	ESG21Duluth	

Table 7 - Project Information

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

Each year the Community Development Committee develops funding targets based on needs assessments, data analysis, and input from public hearings. These funding targets then guide the review

of applications and funding recommendations. For 2021, the funding targets were set as the following:

Community Development Block Grant

Affordable Housing, Target: 45%, Recommended: 36%

• Economic Development, Target: 15%, Recommended: 16%

• Public Facilities, Target: 5%, Recommended: 13%

• Public Services, Target: 15%, Recommended: 15%

• Planning/Administration: 20%, Recommended: 20%

AP-38 Project Summary

Project Summary Information

1	Project Name	Housing Rehab 2021
	Target Area	
	Goals Supported	Affordable Housing Neighborhood Revitalization
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$641,000
	Description	Provide rehab loans for LMI households
	Target Date	3/21/2022
	Estimate the number and type of families that will benefit from the proposed activities	115 LMI families will benefit.
	Location Description	City of Duluth
	Planned Activities	The Duluth HRA, Ecolibrium3, and One Roof will provide funding and services for rehab activities for LMI households
2	Project Name	Community Land Trust: Acquisition-Rehab-Resale- CDBG and HOME 2021
	Target Area	
	Goals Supported	Affordable Housing
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$240,000 HOME: \$303,476
	Description	Acquire and rehab blighted houses and sell them to LMI households
	Target Date	3/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	24 families will benefit
	Location Description	City wide
	Planned Activities	Aquire and rehab 24 housing units and sell them to LMI families
3		C : ''. \
3	Project Name	Spirit Valley Updates and Efficiencies 2021

	Goals Supported	Neighborhood Revitalization Childcare Access
	Needs Addressed	Neighborhood Improvement and Safety
	Funding	CDBG: \$50,000
	Description	provide rehab work a facility that provides services and housing for LMI young mothers
	Target Date	3/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	75 families will benefit
	Location Description	City wide
	Planned Activities	provide rehab work a facility that provides services and housing for LMI young mothers
4	Project Name	Acquisition Demolition Program 2021
	Target Area	
	Goals Supported	Neighborhood Revitalization
	Needs Addressed	Neighborhood Improvement and Safety
	Funding	CDBG: \$88,900
	Description	acquisition and demolition activities for blighted buildings
	Target Date	3/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	Numerous families adjacent to these blighted buildings, expect a minimum of 350 families
	Location Description	City wide
	Planned Activities	acquisition and demolition activities for blighted buildings
5	Project Name	Equipment Upgrades to Improve Care -2021
	Target Area	
	Goals Supported	Health Services
	Needs Addressed	Non-Homeless Need
	Funding	CDBG: \$43,000

	Description	provide equipment upgrade at the Lake Superior Health Center
	Target Date	3/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	At least 20,000 people will benefit
	Location Description	The facility is the Lake Superior Health Center located at 4325 Grand Avenue in the West Duluth neighborhood
	Planned Activities	provide equipment upgrade at the Lake Superior Health Center
6	Project Name	Niiwin Indigenous Foods Market Construction 2021
	Target Area	
	Goals Supported	Neighborhood Revitalization
	Needs Addressed	Community Development Public Facilities
	Funding	CDBG: \$135,000
	Description	Renovation of a closed food market in a LMI neighborhood so that it will be able to be open and sell food and other items.
	Target Date	3/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	5,986 families that live within a mile of this location, as well as other individuals who work in the area
	Location Description	In the LMI Central Hillside Neighborhood, 102 East 4th Street
	Planned Activities	Renovation of a closed food market in a LMI neighborhood so that it will be able to be open and sell food and other items.
7	Project Name	Job Training Programs-Life House and Soar 2021
	Target Area	
	Goals Supported	Increase Incomes
	Needs Addressed	Economic Development
	Funding	CDBG: \$240,000
	Description	two agencies will provide training skills to LMI individuals with the goal for them to obtain living wage jobs
	Target Date	3/31/2022

	Estimate the number and type of families that will benefit from the proposed activities	190 families will benefit
	Location Description	City wide
	Planned Activities	two agencies will provide training skills to LMI individuals with the goal for them to obtain living wage jobs
8	Project Name	Business Assistance Workshops 2021
	Target Area	
	Goals Supported	Create Living Wage Jobs
	Needs Addressed	Economic Development
	Funding	CDBG: \$139,000
	Description	Agencies will provide technical training to LMI businesses
	Target Date	3/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	48 families will benefit
	Location Description	City wide, but with a focus on LMI neighborhoods
	Planned Activities	Agencies will provide technical training to LMI businesses
9	Project Name	Public Services-General 2021
	Target Area	
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$22,000
	Description	CAD Tax Site
	Target Date	3/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	1225 families will benefit
	Location Description	City wide
	Planned Activities	people will be assisted with their taxes

10	Project Name	Public Services-Childcare 2021
	Target Area	
	Goals Supported	Childcare Access
	Needs Addressed	Public Services
	Funding	CDBG: \$62,000
	Description	Agencies will provide funding for child care for LMI families
	Target Date	3/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	120 families
	Location Description	Citywide
	Planned Activities	Agencies will provide funding for child care for LMI families
11	Project Name	Public Services-Food Access 2021
	Target Area	
	Goals Supported	Food Access
	Needs Addressed	Public Services
	Funding	CDBG: \$112,250
	Description	agencies will provide food to LMI people, some who are experiencing homelessness
	Target Date	3/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	15,625 families
	Location Description	CHUM food shelf and at Life House
	Planned Activities	agencies will provide food to LMI people, some who are experiencing homelessness
12	Project Name	Public Services-Rental Services 2021
	Target Area	
	Goals Supported	Public Services Homelessness

	Needs Addressed	Public Services Homelessness
	Funding	CDBG: \$45,000
	Description	Agencies will provide technical assistance to renters and landlords to avoid eviction; Salvation Army will provide incentives to landlords so provide housing for people who would otherwise may not be able to find rental units.
	Target Date	3/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	625 families
	Location Description	City wide
	Planned Activities	Agencies will provide technical assistance to renters and landlords to avoid eviction; Salvation Army will provide incentives to landlords so provide housing for people who would otherwise may not be able to find rental units.
13	Project Name	Public Services-Housing Supports 2021
	Target Area	
	Goals Supported	Public Services Homelessness
	Needs Addressed	Homelessness Public Housing
	Funding	CDBG: \$29,625
	Description	funding will be used to provide transitional supportive housing
	Target Date	3/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	326 families will benefit
	Location Description	MACV, Center City, and Salvation Army
	Planned Activities	funding will be used to provide transitional supportive housing
14	Project Name	Public Services-Shelter 2021
	Target Area	

	Goals Supported	Public Services
		Homelessness
	Needs Addressed	Public Services
		Homelessness
	Funding	CDBG: \$62,000
	Description	Funds for homeless shelters- CHUM and Safe Haven
	Target Date	3/31/2022
	Estimate the number and	42,500 families
	type of families that will	
	benefit from the proposed	
	activities	
	Location Description	CHUM and Safe Haven Shelters
	Planned Activities	provide funding for shelters that serve people who are
15		homeless, including due to domestic violence
15	Project Name	Coordinate Entry 2021
	Target Area	
	Goals Supported	Public Services
		Homelessness
	Needs Addressed	Homelessness
		Public Housing
	Funding	CDBG: \$12,000
	Description	Coordinated Entry for housing that serves LMI families, including
		ones that were homeless
	Target Date	3/21/2022
	Estimate the number and	1625 families will benefit
	type of families that will	
	benefit from the proposed	
	activities	
	Location Description	City Wide
	Planned Activities	Coordinated Entry for housing that serves LMI families, including ones that were homeless
16	Project Name	Tenant Based Rental Assistance 2021
	Target Area	
	-	I

	Goals Supported	Homelessness
	Needs Addressed	Homelessness
	Funding	HOME: \$90,624
	Description	Tenant Based Rental Assistance- provide rental assistance to LMI households
	Target Date	3/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	16 families
	Location Description	City wide
	Planned Activities	Tenant Based Rental Assistance- provide rental assistance to LMI households
17	Project Name	Community Land Trust: New Construction 2021
	Target Area	
	Goals Supported	Affordable Housing
	Needs Addressed	Affordable Housing
	Funding	HOME: \$100,000
	Description	construction of 2 units for LMI families
	Target Date	3/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	two families will benefit
	Location Description	City wide
	Planned Activities	construction of two housing units
18	Project Name	ESG21Duluth
	Target Area	
	Goals Supported	Homelessness
	Needs Addressed	Homelessness
	Funding	ESG: \$208,000
	Description	HESG funding for the City of Duluth for the 2021 program year

Target Date	3/31/2022
Estimate the number and type of families that will benefit from the proposed activities	2,226 families
Location Description	City wide
Planned Activities	HESG funding for the City of Duluth for the 2021 program year

AP-50 Geographic Distribution - 91.220(f)

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

We do not have HUD approved neighborhood revitalization areas but we do have locally designated CDBG eligible neighborhoods that are over 51% LMI where efforts are often focused.

Geographic Distribution

Target Area	Percentage of Funds

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

NA

Discussion

NA

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The city of Duluth works to provide affordable housing in a multi-faceted manner through its policies and entitlement funding goals. The City will utilize sub-recipients to provide services for homeless people to help them obtain stable and affordable housing as well as assist low- and moderate-income populations to acquire or maintain affordable housing through rental assistance, building new units, and rehabbing existing units.

One Year Goals for the Number of Households to be Supported	
Homeless	5,267
Non-Homeless	141
Special-Needs	557
Total	5,965

Table 9 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	116
The Production of New Units	2
Rehab of Existing Units	115
Acquisition of Existing Units	24
Total	257

Table 10 - One Year Goals for Affordable Housing by Support Type

Discussion

Homeless service providers in Duluth work to provide comprehensive services including access to stable, affordable housing options for those currently on the street or with the possibility of experiencing homelessness. Sub-recipient agencies working together to provide these services include: , Churches United in Ministry, the Damiano Center, Safe Haven, Salvation Army, MACV Duluth, and Center City Housing Corporation. Sub-recipient agencies that are working to either rehab existing housing or build/provide new affordable housing programs to low income populations include One Roof Community Housing, Center City Housing Corporation, Ecolibrium3, and the Duluth HRA. The Duluth HRA provides a rental assistance program through the City's HOME funds, which will support approximately very low income households using tenant based rental assistance. This program combined with the ESG Prevention and Rapid Rehousing program provides rental assistance.

AP-60 Public Housing – 91.220(h)

Introduction

The Duluth Housing and Redevelopment Authority manages approximately 1,008 public housing units and 1,453 Section 8 Housing Choice Voucher units.

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

The City of Duluth does not expect to spend any CDBG, HOME, or ESG funds to address the needs of public housing beyond funding the HRA's tenant based rental assistance program. The HRA is exploring the various repositioning options allowed by HUD to move public housing to a more sustainable and reliable source of funding; thus, preserving public housing assets. These options include Section 18 disposition of scattered sites, RAD-PBRA and/or RAD-PBV for high-rise buildings, and Section 22 Streamlined Voluntary Conversion for remaining units not eligible for other types of conversion. The HRA will continue to monitor expansion and addition of repositioning options offered by HUD.

There are extensive waitlists for both the Section 8 Housing Choice Voucher Program and public housing. The HRA will continue to work at diligently processing applications from these lists. Periodically the HRA will send out letters to all households on the list and ask them to respond that they want to remain on the list (some may have housing already, some may have moved out of the area, etc.), to maintain efficiency in addressing Duluth's pressing housing needs.

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

The HRA has a resident who is commissioner on the HRA board in addition to a resident advisory board for all public housing and resident clubs at each of the six high rise buildings. The Duluth HRA also has a Family Self Sufficiency Program that receives funding from HUD for FSS activities, which include the option to set up an escrow for future home ownership.

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

NA

Discussion

The city of Duluth works closely with the Duluth HRA to assure that the Public Housing policies and strategies are aligned with the cities strategies in order to best meet the need for housing in Duluth.

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

St. Louis County (SLC) is one of many Continuum of Care (CoC) regions in Minnesota. Duluth is geographically located at the southern end of St. Louis County. There are two entitlement communities in SLC, the City of Duluth and St. Louis County.

City of Duluth has long history of working closing with SLC and homeless housing and service providers to address issues that impact persons who are homeless or at-risk of becoming homeless.

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 City of Duluth is part of the St. Louis County Continuum of Care (CoC). The CoC coordinates with homeless providers and has developed a collaborative system to reach out to homeless. An integral part of the system is the Coordinate Access. The service providers have agreed under Coordinated Entry to use the Service Prioritization Decision Assistance Tool (SPDAT) as a common assessment tool for all homeless persons. As part of the assessment all individuals and families looking to receive housing assistance will first undergo a pre-screen administered by 2-1-1 United Way. This first step will help with prevention and diversion and refer those in need to emergency shelter. The client will then be administered the Vulnerability Index (VI) SPDAT at determined entry points. This is a quick, condensed version of the SPDAT and will give the recipient a acuity score which will determine the appropriate housing solution. The score will assess what program the individual best fits and puts the individual on a wait list if not available units are available. The most vulnerable individuals receive priority for housing. Once matched with the appropriate housing, the client's case manager will administer the SPDAT. The SPDAT measures a variety of issues that can effects a persons stability. The categories can be tracked over time as the SPDAT is administered every 3 months or so. The SPDAT can be inputted into HMIS. This will allow service providers to track stability much more effectively and show with data the progress an individual or family is making toward housing stability.

Addressing the emergency shelter and transitional housing needs of homeless persons

Through the Coordinate Entry system persons experiencing a housing crisis will be able to be provided with a housing solution efficiently and effectively. The transitional housing providers, emergency shelters, permanent supportive housing providers, and public housing providers have collaborated on creation of the Coordinate Access System. In doing so the agencies also worked to developed goals and standards for each part of the system for which a client may utilize. For example, in shelter the goal is to reduce bed nights or average stay in shelter before housing. If a person is in transitional housing the goal

is to place the client into permanent housing or at least keep the person in transitional housing for 6 months rather than the street. If the person is in a permanent housing situation such as permanent supportive housing or public housing the goal is keep that person housed for 6 months. Meanwhile during all stages providers will be working to getting their clients stable income and employment, access to health services, etc.

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

In 2021, the City of Duluth will fund Housing, Stabilization, and Coordinated Entry for people who are or recently have been homeless. This will include the work of six agencies that include; Churches United in Ministry, Life House, Salvation Army, Center City Housing Corporation, Safe Haven, and MACV-Duluth.

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 discharge plan outlines transition process steps, based on an evidence-based model called Critical Time Intervention, a standardized assessment tool that is used by all discharging entities upon client admission to identify those at risk of homelessness, specific services to be offered to all clients and additional services offered to at-risk clients. The Discharge Plan also outlines the roles and responsibilities of the collaborative partner agencies, including coordination, information sharing, staffing patterns for institutional-based and community-based staff, and training.

Discussion

The City is actively working with community partners for new ideas/innovations to assist people facing homelessness.

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

Introduction:

The economic recession of 2008 proved to be a turning point for the city from a predominantly resource-based economy to a more diversified job base. As the housing market has recovered from the recession, rents and home sale prices are rising, but increases in income are not keeping up resulting in higher poverty rates and more cost-burdened households. The total number of housing units in Duluth is increasing, but there are still not enough units resulting in a "seller's market" with competitive and quick home sales, low rental vacancy rates, and increasing rents. Recently and in the coming years baby boomers are retiring in record numbers, leaving positions that have been filled for decades. Employers across the state, including in Duluth, have had to be creative in attracting and retaining employees with competitive benefits packages and flexibility within the workplace.

In recent years the Lincoln Park neighborhood, one of the lowest income neighborhoods in the city, has started to see much needed reinvestment, but appears to have undergone some significant demographic changes since 2015, signifying that this neighborhood has a high displacement risk. Necessary reinvestment in neighborhoods, such as what is occurring in Lincoln Park, has the potential to displace or limit the ability to stay in place for some residents and businesses.

Impediments to Fair Housing Choice

The City reviewed demographic data, collected input from community members and organizations, and researched trends in housing and real estate in order to develop these impediments to fair housing choice. The following are the identified Impediments to affordable housing.

- 1) Exclusionary rental housing practices and policies directed at Section 8 Housing Choice Voucher holders
- 2) Exclusionary rental housing practices and policies directed at persons with criminal histories
- 3) Involuntary displacement and limited housing choice caused by gentrification
- 4) Policies and physical limitations in the built environment

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

Impediment 4: Policies and physical limitations in the built environment

Strategy 4.1: Conduct a feasibility study that investigates creative tools to incentivize or require some

affordable and/or accessible units in new housing developments.

Strategy 4.2: Continue to make changes to the City's Unified Development Code that address outdated land use and zoning policies, which in turn affect density and mixed income neighborhoods and residential developments.

Strategy 4.3: Explore an alternative rental-licensing program, such as a targeted or tiered system, that addresses rental housing quality, regulatory body and property owner accountability.

Strategy 4.4: Support new or existing rehabilitation programs that focus on healthy homes and retrofitting for ADA accessibility. Implement these programs in a variety of neighborhoods throughout Duluth.

Discussion:

As outlined in the Analysis of Impediments to Fair Housing Choice (AI), the City has taken steps to bring to light the legacies of historical discriminatory housing policies and is committed to addressing the modern-day effects of those policies and practices. Working with community partners, the City will use the Fair Housing Plan in the AI to track and address fair housing issues over the next few years.

AP-85 Other Actions – 91.220(k)

Introduction:

The city of Duluth has identified a number of actions that will address obstacles to meeting underserved needs, foster and maintain affordable housing, reduce the number of poverty-level families, develop institutional structures, and enhance coordination between public and private housing and social service agencies. Many of these actions were identified in the 2035 Imagine Duluth Comprehensive Plan and are in the process of being implemented.

Actions planned to address obstacles to meeting underserved needs

Among with the information in the Action Plan, the City adopted several actions steps to address this issue:

- -Reuse previously developed lands, thereby allowing people to live close to services
- -Support existing economic base and growth sectors, thereby increasing employment opportunities
- -Promote reinvestment in neighborhoods, this includes addressing the digital divide
- -Reinforce the place-specific, including increasing visibility of different cultures
- -Creating and maintain connectivity, promoting non-vehicular transportation
- -Encouraging a mix of activities, uses, and densities
- -Supporting private actions that contribute to the public realm
- -Taking action that enhance the environmental, economic, and social well-being of the community. The City recently adopted an Earned Safe and Sick time policy requiring employers to provide sick time to

employees

- -Working with education systems in the community to increase connectivity and programs
- -Creating efficiencies in delivery of public services
- -Developing a healthy community
- -Integrating fairness into the fabric of the community

Actions planned to foster and maintain affordable housing

This Action Plan is providing funding to programs that foster and maintain affordable housing, in addition the City is working to:

- -Increase density in and around the designated Core Investment Areas
- -Provide affordable, attainable housing opportunities, including projects that receive City funding such as TIF, are required to have an affordable housing component
- -Prioritize inclusive housing policies to reflect the city's social, cultural, economic and historic diversity and development patterns
- -Improve the quality of the city's housing stock and neighborhoods
- -Expand the cohesiveness of "One Duluth" by expanding a variety of housing opportunities throughout the city while maintaining unique community characteristics within distinct individual neighborhoods
- -Working with other local and state agencies on funding affordable housing
- -Working with MN Housing to maintain affordability in existing projects, aka Preservation Projects
- -Actively looking for areas for new affordable housing

Actions planned to reduce lead-based paint hazards

City of Duluth policy requires all rental and homeowner rehabilitation programs and projects receiving federally funded assistance to coordinate with the Duluth HRA for lead assessment, testing and clearance services. Given the age of Duluth's housing stock that predicts 68% contains lead-based paint, the concentration of low- and moderate-income households in less expensive older units, and the past experience of agencies implementing rehab programs, it is highly probable that all, or nearly all,

rehabbed units will contain potential lead hazards.

Actions planned to reduce the number of poverty-level families

This Action Plan is providing funding to programs that provide job training and child care, in addition the City is working on other strategies, including:

- -Investing in people to increase employee's skills, ensuring workforce availability for all employers, and promoting income self-sufficiency. This includes the City providing different pathways for CareerForce and Workforce
- -Fostering growth of existing employers and strategically recruiting new employers to Duluth, to increase employment opportunities
- -Embrace the Outdoors as an Economic Engine and Source of Community Wealth- this provides additional employment opportunities as well as social/physical/mental health to help improve people's lives
- -The City adopted a Community Benefits Policy and Business Subsidy Policy when City funds are being used

Actions planned to develop institutional structure

This City has a number of commissions to address traditional institutional structure that has not been all inclusive. These commissions develop policies and provide feedback on legislation. These commissions include: Indigenous Commission, African Heritage Commission, Human Rights Commission, Commission on Disabilities, and the Citizen Review Board.

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

City Staff are members of many community oriented groups, include the Affordable Housing Coalition, COC Governance Board, Census Outreach Committee, and local neighborhood groups.

Discussion:

The City of Duluth adopted the Imagine Duluth 2035 plan on June 25, 2018 which contains many provisions to address these issues. Every year the City produces a "report card" of the implementation steps to review progress.

Program Specific Requirements

AP-90 Program Specific Requirements – 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.

 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 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. The amount of surplus funds from urban renewal settlements 	0 0 0
4. The amount of any grant funds returned to the line of credit for which the planned use has not	
been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	0
Other CDBG Requirements	
1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate	

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:
- 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:

- 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:
- 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:

Emergency Solutions Grant (ESG) Reference 91.220(I)(4)

- 1. Include written standards for providing ESG assistance (may include as attachment)
- 2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.
- 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).
- 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.
- 5. Describe performance standards for evaluating ESG.