



# PHA Plan for PHA FY 2025 (FFY 2024) Attachments to Agency Plan Version 2

- Attachment A. Membership of the Resident Advisory Board
- Attachment B. Comments on Agency Plan and PHA Responses
- Attachment C. PHA Management Organizational Chart
- Attachment D. Violence Against Women Act (VAWA), Reauthorized 2022
- Attachment E. Pending Disposition Activities: None
- Attachment F. *Capital Fund Program. The PHA will submit the CFP application and annual reports separately with the signed amendment to the Annual Contributions Contract (ACC) after the actual amount of the PHA's CFP grant for the new Federal Fiscal Year is announced.*
- Attachment G. Public Housing and Section 8 Policy Changes
- Attachment H. Housing Needs; Excerpts from the City of Saint Paul, Minnesota Consolidated Plan and Submission 2020-2024 (PDF)
- Attachment I. Development/Conversion Concept: Expand Public Housing Inventory Available for Eligible Families or Individuals (*Revised*)
- Attachment J. Conversion of Public Housing to Project-Based Assistance under RAD
- Attachment K. Implementing HUD's Smoke-Free Mandate
- Attachment L. Use of Operating Funds for Capital Activities
- Attachment M. Deleted
- Attachment N. Definition of a Significant Amendment to the Agency Plan
- Attachment O. Emergency Housing Vouchers (EHV)
- Attachment P. Definition of a Significant Amendment to the CFP 5-Year Action Plan

## **MEMBERSHIP OF THE RESIDENT ADVISORY BOARD**

- Section 8/Housing Choice Voucher representatives who volunteered for the RAB in response to mass mailings.
- Residents of public housing (that is, the scattered site single family homes and duplexes) who volunteered for the RAB in response to mailings.

PHA staff will continue to send information about the RAB to the two PHA Commissioners who are residents of PHA-owned housing. As of May 1, 2024 Leonard Thomas represents hi-rise residents and Veronica Robinette represents family housing residents.

The Resident Advisory Board membership fluctuates due to residents moving out of public housing or leaving the HCV/Section 8 program, etc.

RAB mailings have also been sent to Southern Minnesota Regional Legal Services, Inc. (SMRLS).

Before the PHA converted most of its public housing (16 hi-rises and four family housing developments) to Multifamily Housing (Project-Based Rental Assistance, PBRA) the RAB also included representatives from those properties.

Because of the COVID-19 pandemic, the 2023 RAB meetings and the public hearing were “virtual”, held on “Zoom” conference calls (the same as meetings of the Presidents Council and City-Wide Resident Council).

## **SUMMARY OF COMMENTS ON AGENCY PLAN AND PHA RESPONSES**

### **RAB Comments**

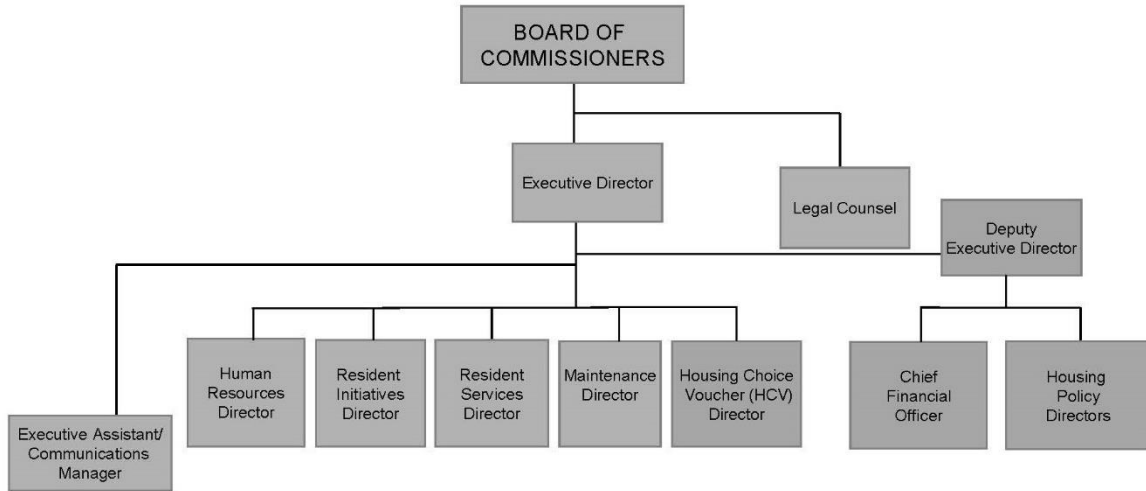
Because of the COVID-19 pandemic, the RAB meetings were “virtual” this year, held on “Zoom” conference calls (the same as meetings of the Presidents Council and City-Wide Resident Council). The PHA convened two meetings of the Resident Advisory Board (RAB) in September 2023 to discuss the Agency Plan requirements and drafts and other policy issues. The RAB did not submit any written comments on the Agency Plan.

### **Comments from the Public Hearing**

*The Agency Plan Public Hearing was held on November 21, 2023.*

*Because of the COVID-19 pandemic, the public hearing will be “virtual” again this year, held on a “Zoom” conference call with telephone access. No written comments on the Plan were submitted.*

**PUBLIC HOUSING AGENCY OF THE CITY OF SAINT PAUL  
ORGANIZATIONAL CHART  
Board Approved February 22, 2023**



## **Violence Against Women Act (VAWA); 2013 and 2022 Reauthorizations**

On April 25, 2007 the PHA Board of Commissioners approved a Policy on Protections for Victims of Domestic Violence (“VAWA Policy”) and related amendments to the PHA’s Admission and Occupancy Policies for the Public Housing Program and the Section 8 Housing Choice Voucher Program. The policies are posted on the PHA’s Internet website, [www.stpha.org](http://www.stpha.org). On May 24 and September 27, 2017 the PHA Board approved revisions to the policy to conform to the 2013 Reauthorization.

The PHA adopted these policies in compliance with the Violence Against Women Act (VAWA) as amended. The Act also requires the PHA to describe in the Agency Plan any goals, objectives, policies or programs that will enable the PHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault or stalking. (Sec. 603).

On March 15, 2022, the President signed into law the Consolidated Appropriations Act of 2022, which included the Violence Against Women Act Reauthorization Act of 2022 (VAWA 2022). VAWA 2022 reauthorizes, amends, and strengthens the Violence Against Women Act of 1994 with revised definitions for the statute.

- The PHA supports the goals of the VAWA and will comply with its requirements.
- The PHA will continue to administer its housing programs in ways that support and protect residents (including residents of public housing and Multifamily Housing/PBRA, and Section 8 Housing Choice Voucher program participants) and applicants who may be victims of domestic violence, dating violence, sexual assault or stalking.
- The PHA will not take any adverse action against a resident/participant or applicant solely on the basis of her or his being a victim of such criminal activity, including threats of such activity. “Adverse action” in this context includes denial or termination of housing assistance.
- The PHA will not subject a victim of domestic violence, dating violence, sexual assault or stalking to a more demanding standard for lease compliance than other residents.
- The PHA will continue to develop policies and procedures as needed to implement the requirements of VAWA, and to collaborate with other agencies to prevent and respond to domestic violence, dating violence, sexual assault or stalking, as those criminal activities may affect applicants for and participants in the PHA’s housing programs. The PHA cooperates with St. Paul area public and non-profit agencies that provide activities, services and programs to assist and support victims of domestic violence. (See attached list of agencies or go to the website for Minnesota Coalition for Battered Women - <http://www.mcbw.org> )
- The PHA’s VAWA Policy states that “The PHA will provide notices explaining the VAWA protections to applicants for housing assistance (both Section 8 Housing

**ATTACHMENT E** to Saint Paul PHA Agency Plan for PHA FY 2025 (FFY 2024)

Choice Vouchers and Public Housing), to public housing residents and Section 8 voucher participants, and to property owners participating in the voucher program.”

- The PHA has provided VAWA training to its staff, and to other housing agencies through the Minnesota Chapter of NAHRO.

**ATTACHMENT E** to Saint Paul PHA Agency Plan for PHA FY 2025 (FFY 2024)

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○ Name	Business Phone	Crisis Line	Area Served
<a href="#">St. Paul Intervention Project</a>	651-645-2824	651-645-2824	Ramsey County
<a href="#">Jewish Domestic Abuse Collaborative - Jewish Family Services of Mpls</a>	952-546-0616		Hennepin, Ramsey Counties
<a href="#">Breaking Free</a>	651-645-6557	651-645-6557	Ramsey County
<a href="#">Esperanza United</a>	651-646-5553	651-772-1611	Hennepin, Ramsey Counties
<a href="#">Think Self Deaf Domestic Violence Program</a>	651-829-9089	651-399-9995 (text/SMS)	Hennepin, Ramsey Counties
<a href="#">National Clearing House on Abuse in Later Life</a>	608-255-0539		Statewide
<a href="#">Praxis International</a>	651-699-8000		St. Paul/National
<a href="#">Southern Minnesota Regional Legal Services</a>	651-228-9823	651-222-4731	St. Paul/Southern Minnesota
<a href="#">Women of Nations</a>	651-251-1609	877-209-1266	Hennepin, Ramsey Counties
<a href="#">Women's Advocates</a>	651-227-9966	651-227-8284	Statewide
<a href="#">Bridges to Safety</a>	651-645-2824	651-266-9901	Ramsey County

Violence Free Minnesota <https://www.vfmn.org/contact>  
 60 East Plato Blvd., Suite 230, St. Paul, MN 55107  
 Voice: (651) 646-6177 or (800) 289-6177  
 Fax: (651) 646-1527

Public Housing residents and Section 8/Housing Choice Voucher Participants who fear for their safety and need assistance keeping their home address confidential from their abusers may contact the **Safe at Home** program administered by the Office of the Minnesota Secretary of State. More information about the Safe at Home program can be found at <http://www.sos.state.mn.us/safe-at-home/about-safe-at-home/>

## **Pending Disposition Activities**

No disposition activities were underway or contemplated when this Plan was written

On October 3, 2019 the PHA closed on all 8 RAD conversions, converting 3,855 public housing units to Project-Based Rental Assistance (PBRA) under HUD's Multifamily Housing division. The PBRA HAP contracts were effective January 1, 2020. The PHA continues to manage, maintain and improve the 418 single family homes and duplexes on scattered sites which remain in the Public Housing program.

Declaration of Trust (not a disposition). HUD's Special Applications Center (SAC) approved the PHA's request to release HUD's Declaration of Trust (DOT) for the W. Andrew Boss Building (located at 555 North Wabasha Street in St. Paul) which has been on file in the Ramsey County Property records. This is not a property disposition; a "Use Restriction" commits the PHA to continue using the property for its current purposes for not less than 30 years.

## **Capital Fund Program**

**The Capital Fund budgets and reports are not attached to the Agency Plan.**

The PHA submits the required Capital Fund Program (CFP) budgets and reports along with the signed amendment to the Annual Contributions Contract (ACC).

## **POLICY CHANGES IN PUBLIC HOUSING AND SECTION 8**

The following PHA policies were revised after the last Agency Plan was submitted. (Section B.1. of the Annual Plan). The PHA also adopted policy waivers authorized by the CARES Act, as shown on Attachment P.

The complete Admission & Occupancy Policies (AOP) are posted on the PHA's Internet website, [www.stpaulpha.org](http://www.stpaulpha.org).

- On April 26, 2023, the Board of Commissioners approved revisions to the Admission and Occupancy Policies for the Public Housing Program, as follows:
  - Revising the policy regarding “over-income” households to comply with federal law changes and recent instructions from HUD, including
    - Increasing the annual income limit defined as “over-income”, to 120% of the Twin Cities Area Median Income (AMI) ;
    - Extending the time during which an over-income household may remain in public housing; and
    - Revising related policies to conform to HUD requirements; and
  - Updating the procedure for offering vacant scattered site homes to an eligible applicant, to allow two consecutive unit offers; and
  - Making other “housekeeping” updates and edits in the public housing policies, including removing references to the sixteen PHA-owned hi-rises and four family housing developments, which are no longer part of the Public Housing program. (They are now RAD-PBRA, in HUD’s Multifamily Housing program.)
- On December 20, 2023 the Board of Commissioners approved revisions to the Admission and Occupancy Policies for the Public Housing Program, increasing the flat rents for public housing units (all scattered site homes) effective April 1, 2024, to maintain compliance with HUD’s requirement that flat rents be at least 80% of Fair Market Rents (FMRs).
- Also on December 20, 2023 the Board approved increasing the payment standards for the Housing Choice Voucher (HCV; Section 8) Program, and increasing the utility allowances for HCVs. The payment standard increases were based on higher Fair Market Rents (FMRs).

## **HOUSING NEEDS**

The City of Saint Paul's Draft Consolidated Plan for 2020 – 2024 describes the housing needs in the community, at pages 38 - 53.

The 2020-2024 Consolidated Plan outlines federal funding priorities for housing, economic development, infrastructure, and public service needs. The 2020-2021 Annual Action Plan summarizes the actions, activities, and resources used to address these priority needs. Both plans are required by the U.S. Department of Housing and Urban Development (HUD).

<https://www.stpaul.gov/departments/planning-economic-development/consolidated-plan>

## **Development/Conversion Concept: Expand Public Housing Inventory Available for Eligible Families or Individuals**

In recent years the PHA has been pursuing opportunities to develop new affordable housing, using existing PHA resources to leverage other funds.

In 2023 the PHA received commitments of funding for eleven new family housing units (7 units at McDonough Homes and 4 units at Dunedin Terrace). Ramsey County awarded the PHA \$2,600,000 for the new townhome units at McDonough Homes and \$1,350,000 for the new townhome units at Dunedin Terrace.

The units are being developed using the “mixed-finance development” method under the Low Income Public Housing (LIPH) program so they can be converted to Project-Based Rental Assistance (PBRA) using HUD’s “Faircloth-to-RAD” method. Staff expect to submit draft development proposals to HUD by June 30, 2024. Construction will be completed by December 31, 2026.

HUD must approve the two projects separately, with separate “project numbers” for the units at McDonough Homes and at Dunedin Terrace.

The PHA will continue to seek out opportunities to produce affordable housing for veterans and other eligible households by leveraging existing resources in Public Housing, Housing Choice Vouchers/Section 8 or Multifamily housing.

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(This amendment to the Agency Plan was approved by the PHA Board of Commissioners on May 22, 2024. It did not constitute a significant change in the Plan that would require further public notice or another public hearing.)

## **Conversion of Public Housing to Project-Based Assistance Under RAD (Rental Assistance Demonstration)**

On October 3, 2019 the PHA closed on 8 RAD conversions, removing 3,855 units from public housing and converting 3,836 units to Project-Based Rental Assistance (PBRA) under HUD's Multifamily Housing division. (19 units used for non-dwelling purposes were not included in the PBRA HAP Contracts.)

Together the eight RAD conversion applications constituted a near-portfolio-wide conversion including all of the PHA's the sixteen hi-rises and four family housing developments. The PHA's 418 scattered site homes were not part of these RAD applications; they will remain as public housing. The PHA continues to manage, maintain and improve the 418 single family homes and duplexes on scattered sites which remain in the Public Housing program.

In 2023 the PHA received commitments of funding for eleven new family housing units (7 units at McDonough Homes and 4 units at Dunedin Terrace). Ramsey County awarded the PHA \$2,600,000 for the new townhome units at McDonough Homes and \$1,350,000 for the new townhome units at Dunedin Terrace.

The units are being developed using the "mixed-finance development" method under the Low Income Public Housing (LIPH) program so they can be converted to Project-Based Rental Assistance (PBRA) using HUD's "Faircloth-to-RAD" method. Staff expect to submit draft development proposals to HUD by June 30, 2024. Construction will be completed by December 31, 2026.

## **Implementing HUD's Smoke-Free Mandate in Public Housing**

The PHA has implemented HUD's Smoke-Free Mandate in Public Housing, following the Final Rule "Instituting Smoke-Free Public Housing" published December 5, 2016 and HUD Notice PIH 2017-03.

On April 25, 2018 the PHA Board approved the following policy for public housing, as Appendix H to the Admission and Occupancy Policies for Public Housing:

In the interests of providing a healthful living and working environment for PHA residents, staff and others, and to comply with HUD's "Smoke-Free Public Housing Rule" (24 CFR Sec. 965.653) smoking is prohibited in all public housing living units and interior areas (including but not limited to balconies, hallways, rental and administrative offices, community centers, day care centers, laundry centers, and similar structures), as well as in outdoor areas within 25 feet from public housing and adjacent outdoor common spaces (like patios), and administrative office buildings.

The policy applies to the use of all "prohibited tobacco products" which are defined as

Items that involve the ignition and burning of tobacco leaves, such as (but not limited to) cigarettes, cigars, and pipes; as well as waterpipes (hookahs).

This policy does not include "Electronic Nicotine Delivery Systems" (ENDS) such as "e-cigarettes".

This policy shall be incorporated in the lease for all residents.

This policy was effective July 30, 2018.

## **Use of Operating Fund for Capital Activities**

The PHA does not anticipate using funds from the Annual Operating Budget for capital activities in public housing during the Plan year. The only units remaining in public housing are the 418 scattered site single family homes and duplexes; and we expect the Capital Fund Program (CFP) grants for that project will be sufficient to pay for planned capital improvements.

**[ATTACHMENT M – DELETED]**

**DEFINITION OF A SIGNIFICANT AMENDMENT TO THE AGENCY PLAN**

The PHA's current definition of a significant amendment is as follows:

*Substantial deviations or significant amendments or modifications are defined as discretionary changes in the plans or policies of the PHA that fundamentally change the mission, goals, objectives, or plans of the Agency and which require formal approval of the Board of Commissioners.  
(approved by the PHA Board of Commissioners on December 15, 1999)*

The PHA believes this definition does not need to be revised at this time.

The PHA has adopted a separate "significant amendment" statement that applies specifically to the 5-Year Action Plan for the Capital Fund Program. See Attachment P.

**Emergency Housing Vouchers (EHV)**

The PHA received and fully utilized 157 Emergency Housing Vouchers (EHV), in partnership with the Continuum of Care (Heading Home Ramsey or “HHR”) to administer these vouchers. PHAs were required to issue all allocated EHV by September 30, 2023, and the PHA did so. No EHV can be issued after that deadline, but assistance will continue to be paid on vouchers already issued.

**Definition of a Significant Amendment to the CFP 5-Year Action Plan**

Substantial deviations or modifications to the CFP 5-Year Action Plan are defined as changes in the plan that require formal approval by the Board of Commissioners. Additions of a Capital Fund project or non-emergency work items that are not in the current CFP Annual Statement or 5-year Action Plan in an amount equal to or greater than \$250,000 would be considered significant amendments, as well as material changes in regard to demolition, disposition, homeownership, RAD or other conversion, Capital Fund financing, development or mixed finance conversion activities.