

Page	Section Title	Staff Comments	PROPOSED AMENDMENTS TO SAINT PAUL HRA 2026-2027 LOW INCOME HOUSING TAX CREDIT – QUALIFIED ALLOCATION PLAN
P.7	ARTICLE VII Procedure for Selecting Projects; Project Thresholds Requirements	Consistency with new or revised requirements in state statute	1. Projects selected for an allocation or award on or after January 1, 2025, must comply with State prevailing wage law and must use the higher of state prevailing wages per Minnesota Statute 116J.871 and any other applicable federal or local wage that applies to any other funding source for the project.
Attachment 2 – 9% St. Paul’s Selection Priorities	A.1. PERCENTAGE OF HOUSING UNITS SERVING HOUSEHOLDS AT OR BELOW 30% AREA MEDIAN INCOME:	Removed confusing language	Scoresheet: PERCENTAGE OF HOUSING UNITS SERVING HOUSEHOLDS AT OR BELOW 30% AREA MEDIAN INCOME: The project demonstrates that it will help increase the supply of units for the lowest percentage of housing units serving households at or below 30% Area Median Income. A. At least 20% (10pts) B. 10%-19.9% (6pts)
Attachment 2 – 9% St. Paul’s Selection Priorities	A.2. PERCENTAGE OF HOUSING UNITS SERVING HOUSEHOLDS AT OR BELOW 50% AREA: c.	Adding missing language	Scoresheet: PERCENTAGE OF HOUSING UNITS SERVING HOUSEHOLDS AT OR BELOW 50% AREA MEDIAN INCOME: a. 50% - 59.9% of units (1 point) b. 60% - 74.9% of units (3 points) d. 75% - 100% of units (6 points)
Attachment 2 – 9% St. Paul’s Selection Priorities	A.3. HOMELESSNESS:	Consistent with MN Housing language, and using the proper title for the Ramsey County CoC Reduction of points awarded to make proposals more financially viable	Scoresheet: HOMELESSNESS: Up to 25 15 points will be awarded to new construction or substantial renovation projects that provide affordable housing with supportive services for occupancy by homeless households households experiencing homelessness.* All projects claiming points must meet the following threshold requirements: i. Minimum of four (4) units set aside for households experiencing homelessness to be referred exclusively through Ramsey Coordinated Entry System ii. Designated homeless units must be rent and income restricted at 30% AMI (with allowable project-based rent subsidy rents) iii. The applicant must provide satisfactory evidence in writing of a commitment from an appropriate social service agency to provide support services. a. 4-9 homeless units (12 points) (5 points) b. 10-19 homeless units (18 points) (10 points) c. 20 homeless units or more (25 points) (15 Points) *Note: Homeless households Households experiencing homelessness shall be defined as homeless individuals, homeless Veterans, homeless families or unaccompanied youth living in a shelter, on the streets, our doubled-up in housing not their own, and current residents who are participating in a supportive housing program while residing at the project site. The owner must provide satisfactory evidence in writing of a commitment from an appropriate social service agency to provide supportive services. Applicants claiming points for providing units to house homeless households will be required to fill those units through Ramsey County Homeless Coordinated Entry system. Projects serving unaccompanied youth at risk of homelessness are exempt from the Coordinated Entry requirement.
Attachment 2 – 9% St. Paul’s Selection Priorities	B. CREATION AND PRESERVATION:	Prioritizing new construction projects in non-QCT areas and preservation projects in QCT areas	CREATION AND PRESERVATION: The project ensures that the federal housing subsidy and low-income housing restrictions remain in place, preserving long-term affordability, or creating new affordable units through new construction New Construction: Points will be awarded to new construction projects of affordable housing that is located Outside of a QCT (5 Points)

			<p>Substantial Renovation: The project is a substantial renovation that preserves long-term affordability in projects with existing federal or local funds, in order to (1) prevent conversion to market-rate use; or (2) remedy physical deterioration of the project if deterioration would result in loss of affordable housing or risk of loss within 5 years.</p> <p>a. Located inside a Qualified Census Tract (20 points) (5 points) Located outside a Qualified Census Tract (20 points)</p>
Attachment 2 – 9% St. Paul’s Selection Priorities	NATURALLY OCCURRING AFFORDABLE HOUSING (NOAH) PROJECTS	Current market conditions have not promoted many NOAH projects	<p>NATURALLY OCCURRING AFFORDABLE HOUSING (NOAH) PROJECTS</p> <p>Up to 15 points will be awarded to unsubsidized projects with the risk of rents going market rate and needing capital improvements may apply for funding if:</p> <p>a. At least 50% units remain affordable to tenants with income at 60% AMI or below (5 points) 100% units remain affordable to tenants with income at 60% AMI or below (15 points)</p>
Attachment 2 – 9% St. Paul’s Selection Priorities	4. Project-Based Section 8	Language clarification, awarding points only if the project has at least one Project-Based Section 8 unit	<p>Project-Based Section 8: Up to five (5) points will be awarded to projects that are a Substantial Rehabilitation project that preserves existing project-based Section 8 assistance.</p> <p>a. 0% At least 1 unit- 25% of units are PBA Section 8 (1 point) b. 25.1% - 50% of units are PBA Section 8 (3 points) c. 50.1% - 100% of units are PBA Section 8 (5 points)</p>
Attachment 2 – 9% St. Paul’s Selection Priorities	C.1. ENHANCED SERVICES, PROGRAMMING, AND AMMENITIES	<p>Add “b. Child care center to address needs during school day Add “h. Multi-language services (1 point)</p> <p>Some language cleanups</p>	<p>Scoresheet: ENHANCED SERVICES, PROGRAMMING, AND AMMENITIES Up to 7 9 points awarded to projects that provide new or enhanced resident services. Receipt of points are contingent upon an agreement with established local organizations to provide such services to residents and evidence demonstrating:</p> <p>a. After-school programming and/or ECFE (1 point) b. Child care center (1 point) c. Info and Referral Services (1 point) d. Playground Equipment (1 point) e. Community Center or Community Room (1 point) f. Financial capability programming* i.e., Financial literacy, financial counseling and coaching, debt counseling or management planning, tax preparation, and access to safe and affordable financial products through partnership with local organizations such as Neighborhood Development Alliance (NeDA), Lutheran Social Services Credit Building Loan, Neighborworks Home Partners, Model Cities Financial Literacy Program, Prepare + Prosper FAIR Initiative and financial inclusion, among others. (1 point) g. Homeownership readiness* i.e. matches savings accounts for down payments [and/or] pre-purchase homeownership counseling or coaching through a HUD-approved counseling agency, a member of the Minnesota Homeownership Center’s Homeownership Advisors Network, or a Minnesota Housing Finance Agency Homeownership Capacity provider. (1 point) h. Multi-language services (1 point) i. Other (please describe) (1 point)</p> <p>*Designates that at At least two of these services (within the paragraph) must be included to claim more than one point.</p>
Attachment 2 – 9% St. Paul’s Selection Priorities	D.2. TRANSIT	Expand transit buffer area to be consistent with Metro Transit assumption	<p>Scoresheet: TRANSIT Points will be awarded to new construction or substantial rehabilitation projects.</p> <p>a. Located within 0-25 0.50 miles of a completed or planned* light rail train (“LRT”) station and bus rapid transit (“BRT”) or other fixed transitways stops. (3 points)</p>

		Additional points for projects that increase mixed use spaces in corridors where it is most critical	<p>b. Located within 0.50 miles of a high service Metro Transit bus route (defined as a bus running at least every 30 minutes) (2 points)</p> <p>*Note: Includes planned stations on future transitways that are in advanced design or under construction. To be considered in advanced design, transitways need to meet the following criteria: issuance of a draft EIS, station area planning underway, and adoption by the Metropolitan Council Transportation Policy Plan. Applicant can only claim 3 or 2 points, not both.</p> <p>c. Additional points awarded for projects that claimed transit points and will include mixed-use development (3 points)</p>
Attachment 2 – 9% St. Paul’s Selection Priorities	D.4 EQUITY AND CULTURAL INTEGRATION	Propose language matches with Minnesota Housing’s QAP language and provides much better detail around specific expectations for developers to fulfill	<p>Scoresheet: EQUITY AND CULTURAL INTEGRATION</p> <p>Up to 10 points will be awarded to projects that demonstrate the use of strategic and integrated approaches to addressing equity issues and the intended impacts of the project will result in tangible and measurable equitable outcomes. (10 points)</p> <p>To receive Equitable Development points (10 points), there must be evidence that the project attempts to address the needs of a Community Most Impacted (CMI) by housing disparities and that a Qualified Stakeholder Group (QSG), with meaningful participation from that community, has a significant role in the project proposal as defined below. Occupancy restrictions or services provided as a result of the selection criteria are excluded. Applicants must complete the Minnesota Housing Equitable Development Narrative and submit documentation demonstrating how the initiative meets the requirements outlined below. Submission must include all referenced data, reports and information.</p> <p>To be eligible for Equitable Development, submit documentation that meets all (a-d) of the following conditions:</p> <p>1. Threshold Criteria</p> <p>a. Housing Disparity Addressed by the project</p> <p>i. Identify which CMI(s) is/are this project proposal focused on serving. If the project is focused on serving multiple populations, select the CMI(s) participating in the QSG that has a significant role in the proposal.</p> <ol style="list-style-type: none">1. Lowest income (e.g. <=30% of area median income (AMI))2. People of Color3. Indigenous People4. LGBTQ+ People5. People Experiencing Homelessness6. People with Disabilities7. Immigrants8. Large Families9. Seniors10. Families with children <p>b. Meaningful participation of CMI: A QSG must have meaningful participation of the CMI that is the focus of the project proposal as documented in the narrative</p> <p>i. Describe the QSG’s mission, and purpose in elevating the voices of the identified CMI</p> <p>ii. Identify and describe what leadership and/or advisory roles people belonging to the identified CMI have in the QSG, including one or more of the following:</p> <ol style="list-style-type: none">1. A paid leadership position; list position2. A member of the board3. A paid staff position4. A member role, such as serving on an advisory committee5. Other meaningful role, such as volunteer (describe) <p>iii. Provide a list of the QSG’s previous activities related to the identified CMI and community development. If there have been no previous activities, describe who formed the QSG and why.</p>

			<p>c. Meaningful engagement with the identified CMI through the QSG: The development team must provide evidence that the QSG and specifically the CMI participants have been meaningfully engaged in the project concept by conducting, at minimum, two meetings with the group prior to submission of the current application. Documentation must be provided to evidence engagement and may include meeting minutes, notes, survey results, etc. Note: any in-process engagement with the QSG must include a detailed timeline for work done to-date, next steps, and future completion.</p> <p>d. Significant involvement of the QSG: the developer partnered with the QSG and the identified CMI to develop the project proposal. Identify and submit a narrative explaining how the QSG was involved in the development, the specific input they provided, and how the project addresses or responds to that input. These must be in addition to the mandatory minimum requirements of the QAP, and in addition to the minimum requirements for which points are taken in other selection criteria. Applicants may select more than one of the following:</p> <ul style="list-style-type: none">i. Designii. Servicesiii. Community Benefits: an agreement between the developer and local community to provide a benefit as identified by CMI in the local community. (i.e. projects that support paying a competitive wage, employing union workers and/or individuals from the neighborhood, or participating in a Worker-Driven Social Responsibility compliance and monitoring system, community services, training, shared green space, etc).iv. Other (describe in the narrative) <p>e. Provide a signed letter from QSG. The letter must be signed by group participants who are willing to sign the document. The letter must address each of the following questions:</p> <ul style="list-style-type: none">i. How has the developer engaged with the QSG and the identified CMI to create a project responsive to the vision of the group and needs of the CMI?ii. How will this project help in fulfilling a need in your community?iii. How often did the QSG meet with the developer and what were those meetings like?iv. How has the project changed in response to the input from the QSG?v. If the development is selected, what are your expectations for the QSG’s continued involvement in the project?
Attachment 4 – 4% St. Paul’s Self-Scoring Worksheet	<u>A. INCREASE SUPPLY FOR THOSE WITH THE LOWEST INCOMES</u>	Cleanup and clarifications	<p>A. INCREASE SUPPLY FOR THOSE WITH THE LOWEST INCOMES</p> <p>1. PERCENTAGE OF HOUSING UNITS SERVING HOUSEHOLDS AT OR BELOW 30% AREA MEDIAN INCOME: The project demonstrates that it will help increase the supply of units for the lowest percentage of housing units serving households at or below 30% Area Median Income.</p> <ul style="list-style-type: none">a. At least 20% (10pts)b. 10%-19.9% (6pts) <p>2. PERCENTAGE OF HOUSING UNITS SERVING HOUSEHOLDS AT OR BELOW 50% AREA MEDIAN INCOME:</p> <ul style="list-style-type: none">a. 50% - 59.9% of units (1 point)b. 60% - 74.9% of units (3 points)c. 75% - 100% of units (6 points)
Attachment 4 – 4% St. Paul’s Self-Scoring Worksheet	<u>3. HOMELESSNESS</u>	Consistent with MN Housing language, and using the proper title for the Ramsey County CoC	<p><u>Scoresheet: HOMELESSNESS:</u> Up to 25 15 points will be awarded to new construction or substantial renovation projects that provide affordable housing with supportive services for occupancy by homeless households households experiencing homelessness.*</p> <p>All projects claiming points must meet the following threshold requirements:</p> <ul style="list-style-type: none">ii. Minimum of four (4) units set aside for households experiencing homelessness to be referred exclusively through Ramsey Coordinated Entry System

		Reduction of points awarded to make proposals more financially viable	<p>iii.Designated homeless units must be rent and income restricted at 30% AMI (with allowable project-based rent subsidy rents)</p> <p>iv.The applicant must provide satisfactory evidence in writing of a commitment from an appropriate social service agency to provide support services.</p> <p>b. 4-9 homeless units (12 points) (5 points)</p> <p>c. 10-19 homeless units (18 points) (10 points)</p> <p>d. 20 homeless units or more (25 points) (15 Points)</p> <p>*Note: Homeless households Households experiencing homelessness shall be defined as homeless individuals, homeless Veterans, homeless families or unaccompanied youth living in a shelter, on the streets, our doubled-up in housing not their own, and current residents who are participating in a supportive housing program while residing at the project site. The owner must provide satisfactory evidence in writing of a commitment from an appropriate social service agency to provide supportive services. Applicants claiming points for providing units to house homeless households will be required to fill those units through Ramsey County Homeless Coordinated Entry system. Projects serving unaccompanied youth at risk of homelessness are exempt from the Coordinated Entry requirement.</p>
Attachment 4 – 4% St. Paul’s Self-Scoring Worksheet	4. CREATION AND PRESERVATION	Prioritizing new construction projects in non-QCT areas and preservation projects in QCT areas	<p>CREATION AND PRESERVATION:</p> <p>The project preserves long-term affordability in projects with existing federal or local funds, in order to (1) prevent conversion to market rate use; or (2) remedy physical deterioration of the project if deterioration would result in loss of affordable housing. (15 points) The project ensures that the federal housing subsidy and low-income housing restrictions remain in place, preserving long-term affordability, or creating new affordable units through new construction.</p> <p>1. <u>New Construction: Points will be awarded to new construction projects of affordable housing that is located</u></p> <p>a. <u>Outside of a QCT (5 Points)</u></p> <p>1. SUBSIDIZED AFFORDABLE HOUSING PROJECTS Substantial Renovation:</p> <p>2. <u>The project is a substantial renovation that preserves long-term affordability in projects with existing federal or local funds, in order to (1) prevent conversion to market-rate use; or (2) remedy physical deterioration of the project if deterioration would result in loss of affordable housing or that are at a risk of loss within 5 years. (15 points)</u></p> <p>a. <u>Located inside a Qualified Census Tract (15205 points)</u></p> <p><u>Located outside a Qualified Census Tract (2015 points)</u></p>
Attachment 4 – 4% St. Paul’s Self-Scoring Worksheet	5. NATURALLY OCCURRING AFFORDABLE HOUSING (NOAH) PROJECTS	Current market conditions have not promoted many NOAH projects.	<ul style="list-style-type: none">● NATURALLY OCCURRING AFFORDABLE HOUSING (NOAH) PROJECTS <p>Up to 15 points will be awarded to unsubsidized projects with the risk of rents going market rate and needing capital improvements may apply for funding if:</p> <ul style="list-style-type: none">● At least 50% units remain affordable to tenants with income at 60% AMI or below (5 points)● 100% units remain affordable to tenants with income at 60% AMI or below (15 points)
Attachment 4 – 4% St. Paul’s Self-Scoring Worksheet	6. Project-Based Section 8	Language clarification, awarding points only if the project has at least one Project-Based Section 8 unit	<p>Project-Based Section 8:</p> <p>Up to five (5) points will be awarded to projects that are a Substantial Rehabilitation project that preserves existing project-based Section 8 assistance.</p> <p>a. 0% At least 1 unit- 25% of units are PBA Section 8 (1 point)</p> <p>b. 25.1% - 50% of units are PBA Section 8 (3 points)</p> <p>c. 50.1% - 100% of units are PBA Section 8 (5 points)</p>

Attachment 4 – 4% St. Paul’s Self- Scoring Worksheet	<u>C.1.</u> ENHANCED SERVICES, PROGRAMMING AND AMENITIES_	Add “b. Child care center to address needs during school day Add “h. Multi-language services (1 point) Some language cleanups	<u>ENHANCED SERVICES, PROGRAMMING, AND AMMENITIES</u> Up to 7 9 points awarded to projects that provide new or enhanced resident services. Receipt of points are contingent upon an agreement with established local organizations to provide such services to residents and evidence demonstrating: <ul style="list-style-type: none">a. After-school programming and/or ECFE (1 point)b. Child care center (1 point)c. Info and Referral Services (1 point)d. Playground Equipment (1 point)e. Community Center or Community Room (1 point)f. Financial capability programming* i.e., Financial literacy, financial counseling and coaching, debt counseling or management planning, tax preparation, and access to safe and affordable financial products through partnership with local organizations such as Neighborhood Development Alliance (NeDA), Lutheran Social Services Credit Building Loan, Neighborworks Home Partners, Model Cities Financial Literacy Program, Prepare + Prosper FAIR Initiative and financial inclusion, among others. (1 point)g. Homeownership readiness* i.e. matches savings accounts for down payments [and/or] pre-purchase homeownership counseling or coaching through a HUD-approved counseling agency, a member of the Minnesota Homeownership Center’s Homeownership Advisors Network, or a Minnesota Housing Finance Agency Homeownership Capacity provider. (1 point)h. Multi-language services (1 point)i. Other (please describe) (1 point) * Designates that at At least two of these services (within the paragraph) must be included to claim more than one point.
Attachment 4 – 4% St. Paul’s Self- Scoring Worksheet	<u>D.3</u> EQUITY AND CULTURAL INTEGRATION	Propose language matches with Minnesota Housing’s QAP language and provides much better detail around specific expectations for developers to fulfill	<u>EQUITY AND CULTURAL INTEGRATION</u> Up to 10 points will be awarded to projects that demonstrate the use of strategic and integrated approaches to addressing equity issues and the intended impacts of the project will result in tangible and measurable equitable outcomes. (10 points) To receive Equitable Development points (10 points), there must be evidence that the project attempts to address the needs of a Community Most Impacted (CMI) by housing disparities and that a Qualified Stakeholder Group (QSG), with meaningful participation from that community, has a significant role in the project proposal as defined below. Occupancy restrictions or services provided as a result of the selection criteria are excluded. Applicants must complete the Minnesota Housing Equitable Development Narrative and submit documentation demonstrating how the initiative meets the requirements outlined below. Submission must include all referenced data, reports and information. To be eligible for Equitable Development, submit documentation that meets all (a-d) of the following conditions: <ul style="list-style-type: none">1. Threshold Criteria<ul style="list-style-type: none">a. Housing Disparity Addressed by the project<ul style="list-style-type: none">i. Identify which CMI(s) is/are this project proposal focused on serving. If the project is focused on serving multiple populations, select the CMI(s) participating in the QSG that has a significant role in the proposal.<ul style="list-style-type: none">1. Lowest income (e.g. <=30% of area median income (AMI))2. People of Color3. Indigenous People4. LGBTQ+ People5. People Experiencing Homelessness6. People with Disabilities7. Immigrants8. Large Families

			<div>9. Seniors</div> <div>10. Families with children</div> <div>b. Meaningful participation of CMI: A QSG must have meaningful participation of the CMI that is the focus of the project proposal as documented in the narrative</div> <div><div>vi. Describe the QSG’s mission, and purpose in elevating the voices of the identified CMI</div><div>vii. Identify and describe what leadership and/or advisory roles people belonging to the identified CMI have in the QSG, including one or more of the following:</div><div><div>1. A paid leadership position; list position</div><div>2. A member of the board</div><div>3. A paid staff position</div><div>4. A member role, such as serving on an advisory committee</div><div>5. Other meaningful role, such as volunteer (describe)</div></div><div>viii. Provide a list of the QSG’s previous activities related to the identified CMI and community development. If there have been no previous activities, describe who formed the QSG and why.</div></div> <div>c. Meaningful engagement with the identified CMI through the QSG: The development team must provide evidence that the QSG and specifically the CMI participants have been meaningfully engaged in the project concept by conducting, at minimum, two meetings with the group prior to submission of the current application. Documentation must be provided to evidence engagement and may include meeting minutes, notes, survey results, etc.</div> <div>Note: any in-process engagement with the QSG must include a detailed timeline for work done to-date, next steps, and future completion.</div> <div>d. Significant involvement of the QSG: the developer partnered with the QSG and the identified CMI to develop the project proposal. Identify and submit a narrative explaining how the QSG was involved in the development, the specific input they provided, and how the project addresses or responds to that input. These must be in addition to the mandatory minimum requirements of the QAP, and in addition to the minimum requirements for which points are taken in other selection criteria. Applicants may select more than one of the following:</div> <div><div>ix. Design</div><div>x. Services</div><div>xi. Community Benefits: an agreement between the developer and local community to provide a benefit as identified by CMI in the local community. (i.e. projects that support paying a competitive wage, employing union workers and/or individuals from the neighborhood, or participating in a Worker-Driven Social Responsibility compliance and monitoring system, community services, training, shared green space, etc).</div><div>xii. Other (describe in the narrative)</div></div> <div>e. Provide a signed letter from QSG. The letter must be signed by group participants who are willing to sign the document. The letter must address each of the following questions:</div> <div><div>xiii. How has the developer engaged with the QSG and the identified CMI to create a project responsive to the vision of the group and needs of the CMI?</div><div>xiv. How will this project help in fulfilling a need in your community?</div><div>xv. How often did the QSG meet with the developer and what were those meetings like?</div><div>xvi. How has the project changed in response to the input from the QSG?</div><div>xvii. If the development is selected, what are your expectations for the QSG’s continued involvement in the project?</div></div>
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