

# **Program Year Three**

## **2022 Annual Action Plan**

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City of St. Cloud, Minnesota | Community Development Block Grant

Amended for 30-Day Public Comment Period (August 25, 2022 to September 23, 2022)

# Executive Summary

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

### 1. Introduction

As an entitlement city, the City of St. Cloud receives Community Development Block Grant (CDBG) funds each year from the U.S. Department of Housing and Urban Development (HUD). A key feature of this grant is the City's ability to choose how the funds will be used. HUD provides a broad range of eligible activities that can be utilized with CDBG funding. The City must determine which of the eligible activities that will best serve the needs of the community. In order to determine the most pressing needs and develop effective, place-based market-driven strategies to meet those needs, HUD requires grantees to develop a Five-Year Consolidated Plan.

The 2022 Program Year (PY) will be the third year of the current five-year Consolidated Plan. The Program Year will start on July 1, 2022 and end on June 30, 2023. This Annual Action Plan will identify available resources and outline the use of the available resources during the Program Year to meet the needs of the community.

Funds will be used to address the following priorities within the HUD performance measurement system:

- Create a suitable living environment;
- provide decent housing; and
- create economic opportunities for the community.

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

City of St. Cloud CDBG Program Mission Statement: In accordance with the overarching goals of the CDBG program, as set forth in 24 CFR § 91.1(a)(1), the City's mission is to utilize CDBG funding to develop viable urban communities by providing decent housing, providing a suitable living environment, and expanding economic opportunities principally for low/moderate income (LMI) persons.

The Five-Year Consolidated Plan process utilizes technical studies, on-going partnerships with community organizations, and input of various community stakeholders to define the high priority needs and five-year goals. The five-year goals as stated in the 2020-2025 St. Cloud Consolidated Plan guides expenditure of the City's annual allocation of CDBG entitlement funds. They are outlined as follows:

- Affordable Housing: Increase the supply and improve the condition of affordable owner-occupied and rental housing in the community.
- Public Facilities and Infrastructure: Provide public facilities and infrastructure meeting the needs of low-moderate income persons.
- Support Services: Reduce poverty, increase stability, and address homelessness by supporting health, well-being and self-sufficiency programs.

- Economic Development: Increase economic opportunity for residents through job training and business assistance programs.

High Priority Needs:

1. Affordable Housing
2. Public Facilities and Infrastructure
3. Support Services
4. Economic Development
5. Fair Housing
6. Homelessness

### **3. Evaluation of past performance**

This Annual Action Plan represents the third year of implementation of the objectives set forth in the 2020 – 2025 Consolidated Plan. The City of St. Cloud has consistently received favorable reviews from HUD in regard to past performance and has demonstrated that it has the capacity to implement CDBG oversight and programs in a timely and efficient manner consistent with HUD approved Consolidated Plans and Annual Action Plans. For more detailed information on past performance for program years, the Consolidated Annual Performance and Evaluation Reports (CAPER) is available on the City’s website and upon request.

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

The primary objective of citizen participation in drafting the 2022 Action Plan is to increase awareness of community needs and effectively implement CDBG funding to assist low-to-moderate income persons. In December 2017, the City updated its Citizen Participation Plan in accordance with the guidance provided in HUD regulations at 24 CFR Part 91.105. The City amended its Citizen Participation Plan in December 2020 to accept alternate means of public review and public comment when necessary in response to the Coronavirus pandemic.

The Planning & Zoning Department provides oversight and management of CDBG for the City of St. Cloud. The Department works in concert with other City departments, public service groups, non-profit organizations, and residents to plan and carry out the activities proposed each year in the Annual Action Plan. In drafting the 2022 Action Plan, the Planning Department conducted outreach to engage a wide range of public and private agencies, housing developers and providers, social service agencies, and community residents. This includes:

- a public application process to apply for project funding in program year 2022 including Request for Proposal (RFP) published in local newspaper;
- email sent to over 100 community-based agencies and groups inviting participation in the process and notifying that the 2022 CDBG funding application is available via City website, email, mail, or hard copy at City Hall as well as the upcoming important CDBG dates;
- meetings with several of non-profit and for-profit organizations to identify eligibility of potential projects;

- discussion with several city departments to help identify eligible projects for upcoming program years;
- discussion of CDBG funding opportunities and priorities at a variety of meetings held by community-based coordinating bodies and coalitions including the United Way Homeless Taskforce, St. Cloud Neighborhood Coalition and St. Cloud Housing & Redevelopment Authority.
- two public hearing notices published in local newspaper and City's webpage in February and March;
- 30-day public comment period published on City's webpage inviting members of the public to comment via email, phone, in-person or at upcoming public hearings;

As a result, the City received 19 CDBG applications from area non-profit and for-profit businesses. Pre-application meetings with the applicants verified that their proposed activity(s) appeared to meet the federal requirements for the use of CDBG funds. The following chronology summarizes the City's formal public participation efforts for PY2022:

- December 11, 2021 – City published a notice in the St. Cloud Times requesting proposals for the City of St. Cloud PY2022 CDBG Program.
- December 11, 2021 – January 21, 2022 - Met with area non-profit organizations and for-profit businesses as well as City Departments to discuss potential activities.
- January 21, 2022 - City received 14 CDBG applications, totaling more than a million dollars in requests.
- January 29, 2022 – City published a public hearing notice in the St. Cloud Times and City's webpage for upcoming public hearings at the Planning Commission and City Council.
- February 8, 2022 – Planning Commission held a public hearing to gain testimony regarding the Program Year 2022 Action Plan. The agenda item was table and the public hearing left open for further comment in March.
- March 8, 2022 – Planning Commission continued the public hearing and made a recommendation to the City Council.
- February 8, 2022 – City published public comment period on the City's webpage.
- April 1, 2022 – City published a public hearing notice in the St. Cloud Times for the upcoming City Council meeting.
- April 11, 2022 – City Council held a public hearing and adopted Resolution authorizing submittal of the 2022 Action Plan.

The Action Plan has been developed using an allocation amount of \$657,807 plus \$87,770 in estimated program income that will be directed toward the St. Cloud HRA Single Family Rehabilitation program. The City will adhere to the Citizen Participation Plan amendment requirements if an activity is proposed to be added or cancelled and/or there are any proposed funding adjustments from the HUD approved Annual Action Plan.

## **5. Summary of public comments**

The City of St. Cloud solicited public involvement in the development of the 2022 Action Plan consistent with the City of St. Cloud's Citizen Participation Plan. On February 8, 2022, the St. Cloud Planning Commission held a public hearing and 11 persons testified. The Planning Commission considered public testimony and left the public hearing open for further comment in March. On March 8, 2022, the St. Cloud Planning Commission continued the public hearing and 9 persons testified. The Planning Commission closed the public hearing and recommended a funding scenario to the St.

Cloud City Council. In addition, the City received 35 letters/emails in support of 2022 applicants. On April 11, 2022, the St. Cloud City Council held a public hearing and 8 persons testified. The City Council considered public testimony and approved funding scenario for the 2022 Action Plan.

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

All comments were accepted. There were no comments or views submitted after the City Council meeting.

**7. Project Summary**

The City of St. Cloud expects to receive approximately \$657,807 in CDBG funds for Program Year 2022. These funds will be used to address priority needs identified in 2020-2025 Consolidated Plan. The following table summarizes proposed projects for implementation in the upcoming program year of 2022.

Applicant	Amount of Original Request	% of Request	Staff Recommendation Allocation
St. Cloud HRA – Single Family Rehab	\$250,000	86%	\$303,770
Place of Hope Main Campus – Electrical Repairs	\$150,000	92.2%	\$150,000
Central Minnesota Habitat for Humanity – Blighted Home Demolition	\$85,000	92.2%	\$85,000
St. Cloud Park Department – Central Park Playground	\$70,000	92.2%	\$70,000
Tri-CAP – Homeless Connect	\$5,000	100%	\$5,000
Program Administration	\$97,750	-	\$131,807

**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	ST. CLOUD	Community Development

**Table 1 – Responsible Agencies**

**Consolidated Plan Public Contact Information**

Matt Glaesman, Community Development Director  
matt.glaesman@ci.stcloud.mn.us  
320-255-7218

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

### **1. Introduction**

The Consolidated Plan is designed to be a collaborative process whereby our community establishes a unified vision for community development actions. It offers local organizations the opportunity to shape the various housing and community development strategies. In preparation for the 2020-2025 Consolidated Plan, the City of St. Cloud retained Maxfield Research to conduct an update of the 2015 Comprehensive Housing Needs. The 2019 Comprehensive Housing Market Study provides recommendations on the amount and types of housing that should be developed to meet the needs of current and future households who choose to reside in St. Cloud. The scope of the study included analysis of the demographic and economic characteristics of the City; review of characteristics of existing housing stock, trends and land supply; and an analysis of the market conditions for a variety of rental and for-sale housing products.

The Consolidated Plan process solicited input from numerous for profit and non-profit housing and service providers in the community in a number of ways including in-person discussions, focus groups, key stakeholder interviews, community survey, a strategic planning session as well as opportunities for comment at public meetings and public hearings. All meetings were held at an accessible meeting place and it was advertised that special accommodations would be made available upon request prior to the meeting. The purpose of soliciting public input is to allow for the opportunity to identify community housing and non-housing community development needs.

Overall, the Community Development Section obtained the views of citizens, public agencies, and other interested parties for the development of the City's priorities for the 2020-2025 Five-Year Consolidated Plan. Additionally, the Action Plan is developed annually with an emphasis on community and stakeholder input.

### **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))**

In preparing the Annual Action Plan, the City consulted with all City departments and outside agencies that have responsibility for administering programs covered or affected by the Action Plan. Local services agencies were invited to participate in the CDBG process with activities focusing on Five-Year Con Plan goals including affordable housing, assisting homeless and those at-risk of homelessness, special needs clientele and fair housing. Informal consultation with social service agencies and housing developers also happened throughout the development of the Action Plan and contributed to the PY2022 funding submissions. Through direct relationships and its involvement in several community coalitions, the City

works closely with the public housing agency, local non-profits, and other service agencies to enhance coordination and achieve the objectives outlined in this Action Plan.

Additionally, City staff continues to be involved in the community by networking with local partners and constantly interfacing with citizens. Through enhanced collaboration, the City is able to work closer with partners to streamline efforts and initiatives. The ultimate result is more effective service provision. The City of St. Cloud will continue to work with governmental, public, and private partners to meet the needs of residents and encourage coordination and collaboration for betterment of the City.

As part of the effort to implement policies, programs and projects identified in the Consolidated Plan, the City works collaboratively with staff from the St. Cloud Housing and Redevelopment Authority (HRA) and three City Council members serve on the HRA Board of Commissioners to inform and further the housing and homeless priorities and strategies within the Con Plan and Action Plan.

The City of St. Cloud will continue to participate with Stearns County and other local government entities (HRA, county human services, and community development) in a series of meetings during Program Year 2022 to evaluate existing housing and support service needs to identify potential gaps or opportunities to enhance through closer coordination.

**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 lead agency for the Central Minnesota Continuum of Care (CoC) is the Central Minnesota Housing Partnership. The Central Minnesota Continuum of Care (CoC) is a network of organizations, community residents and businesses that plan programs with the primary goal of alleviating homelessness in 13 counties in Central Minnesota, as well as the City of St. Cloud. The counties include Cass, Crow Wing, Todd, Morrison, Mille Lacs, Kanabec, Pine, Isanti, Chisago, Stearns, Benton, Sherburne and Wright. There are public meetings in which the community of providers and stakeholders are welcome to attend and provide comment. The City is represented in general membership and consults with the CoC to develop cooperative plans and strategies to leverage resources to provide emergency shelter and rapid re-housing services, and is informed on changes in local goals, objectives and performance measures.

Representatives from the City actively participate in a number of similar committees and associated CoC groups including lead by area service agencies including United Way, TRI-CAP along with area counties and cities to evaluate existing housing and support service needs in our communities and region.

**Table 2 – Agencies, groups, organizations who participated in PY2022 Action Plan Request for Proposals**

1	<b>Agency/Group/Organization</b>	CAIRO
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Applicant for 2022 funding
2	<b>Agency/Group/Organization</b>	District 742 LEAF
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Applicant for 2022 funding
3	<b>Agency/Group/Organization</b>	Homeless Helping Homeless
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Applicant for 2022 funding
4	<b>Agency/Group/Organization</b>	LSS Crisis Nursery
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Applicant for 2022 funding
5	<b>Agency/Group/Organization</b>	XIDIG TV
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Applicant for 2022 funding
6	<b>Agency/Group/Organization</b>	Success Academy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Applicant for 2022 funding
	<b>Agency/Group/Organization</b>	Boys & Girls Club of Central MN

7	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Applicant for 2022 funding
8	<b>Agency/Group/Organization</b>	Catholic Charities
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Applicant for 2022 funding
9	<b>Agency/Group/Organization</b>	Promise Neighborhood
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Applicant for 2022 funding
10	<b>Agency/Group/Organization</b>	St. Cloud HRA
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Applicant for 2022 funding
11	<b>Agency/Group/Organization</b>	St. Cloud Park & Recreation Department
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Applicant for 2022 funding
12	<b>Agency/Group/Organization</b>	Habitat for Humanity
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Applicant for 2022 funding
13	<b>Agency/Group/Organization</b>	Too Much Talent
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Applicant for 2022 funding
14	<b>Agency/Group/Organization</b>	LSS Crisis Nursery
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Applicant for 2022 funding

15	<b>Agency/Group/Organization</b>	Sakan Community Resource
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Applicant for 2022 funding
16	<b>Agency/Group/Organization</b>	Great River Children’s Museum
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Applicant for 2022 funding
17	<b>Agency/Group/Organization</b>	Place of Hope
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Applicant for 2022 funding
18	<b>Agency/Group/Organization</b>	LSS Pathways 4 Youth
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Applicant for 2022 funding
19	<b>Agency/Group/Organization</b>	Center City Housing
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Applicant for 2022 funding

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

None.

**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	Central MN Housing Partnership	Point-in-Time count informed homeless data in Consolidated Plan as well references to the Coordinated Assessment tool.
2019 Comprehensive Housing Market Study	City of St. Cloud	Multiple references to homeless, affordable housing needs and community development issues.
2018 State of Minnesota Report of the Governor’s Task Force on Housing	State of Minnesota	Details issues, goals and recommendations for actions for a resilient housing system statewide.
2015 Comprehensive Plan	City of St. Cloud	References affordable housing as a significant need to be addressed in the next 5-10 years.
St. Cloud HRA Public Housing Plan	St. Cloud HRA	References to annual improvement plan and Five-Year Plan.

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

**Narrative (Optional):**

In developing the Annual Action Plan, the City of St. Cloud relies on a variety of complementary planning efforts to inform the needs and strategies expressed in this Plan. One such effort is ensuring good access to broadband internet services for St. Cloud residents. The City operates a fiber optic communications network via modern fiber-optic infrastructure available in the entire City, which provides access for LMI community members. All of the City census tracts have access to at least three internet service providers. According to the ACS and the Federal Communication Commission’s Fixed Broadband Deployment map, St. Cloud exceeds nationwide standards. Nonetheless, inter-jurisdictional meetings between service providers and area cities and counties (including Administration, Planning, Economic Development and IT Departments) occur regularly on topics of broadband and resiliency. Specifically, an invitation to participate in the 2022 CDBG Annual Action Plan was sent to area internet service providers including Spectrum, Century Link, and Arvig along with the revised 30-day public comment period. See attached Citizen Participation appendix.

Another on-going planning effort is emergency resiliency specifically related to flood prone areas and water resources. To a large extent, the City of St. Cloud has unique regulatory context as it pertains to Federal, State, and local regulations regarding environmental and hydrological features. This includes floodplains, wetlands, wooded areas, shorelands and unprogrammed open as classified locally as Environmentally Sensitive Areas

(ESA) requiring more rigorous site management and community emergency response planning. Additionally, the City of St. Cloud participates in a joint powers' agreement with Stearns County Emergency Management with co-responsibilities to develop community-based plans and programs to maintain a state of readiness to meet natural, man-made, and technological disasters on a local basis. Intensive community and emergency plans are prepared for all forms of flooding and are in addition to the City's comprehensive resiliency planning efforts already in place.

## **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 City of St. Cloud solicited public involvement in the development of the Annual Action Plan consistent with the City of St. Cloud’s CDBG Citizen Participation Plan and 2020-2025 Consolidated Plan. The City is required to have a citizen participation plan establishing means by which the City will engage the public in decisions regarding CDBG funds. The City Council adopted an updated Citizen Participation Plan in December of 2017 expanding engagement efforts in technology, non-government organizations and inclusion of hard to reach populations. The City amended its Citizen Participation Plan in December 2020 to accept alternate means of public review and public comment when necessary in response to the Coronavirus pandemic.

In developing the PY2022 Annual Action Plan and implementation of past Action Plans, the City solicits input from St. Cloud residents in all phases of its community development efforts- from the initial planning and project/program implementation to reporting and assessing accomplishments/outcomes. This process fosters the open and inclusive identification of needs and delivery of services to City residents. It also helps to ensure that the overall direction of the CDBG program is consistent with the residents’ expectation and responsive to neighborhood and stakeholder concerns.

The City encourages citizen participation in all stages of the planning process. From the drafting of the Consolidated Plan and its five-year goals to the submittal of the Consolidated Annual Performance Evaluation Report (CAPER), the City hosts public meetings, provides draft copies of the plans, encourages, accepts, and incorporates citizen input and feedback, and holds special public hearings whenever any substantial amendments are proposed.

The City also works with non-profit organizations to encourage the participation of program beneficiaries, including low- and moderate-income residents. Bi-lingual services and additional assistance for persons with disabilities are available upon request.

The City’s allocation is \$657,807 in Program Year 2022. In accordance with the City of St. Cloud Citizen Participation Plan and the requirements of the U.S. Department of Housing and Urban Development (HUD), a 30-day public comment period, beginning August 25, 2022 and ending September 23, 2022, was published to solicit public comment and questions regarding the addition of a projected 5-year average of annual program income. The City expects to have \$87,770 in estimated program income that will be directed toward the St. Cloud HRA Single Family Rehabilitation program.

**Citizen Participation Outreach**

<b>Sort Order</b>	<b>Mode of Outreach</b>	<b>Target of Outreach</b>	<b>Summary of response/attendance</b>	<b>Summary of comments received</b>	<b>Summary of comments not accepted and reasons</b>	<b>URL (If applicable)</b>
1	Newspaper Ad	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	City published 5 notices in the St. Cloud Times requesting proposals and notifying of public hearings during the drafting of the PY2022 Action Plan.	N/A	No comments were not accepted.	
2	Public Hearing	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	The Planning Commission held public hearings on February 8, 2022 and March 9, 2022. The City Council held a public hearing on April 11, 2022.	Comments detailed in 'Citizen Participation' Attachment in IDIS.	No comments were not accepted.	

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)
3	Public Meeting	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	The City held three public meetings associated with development and adoption of the 2022 Action Plan.	Comments detailed in 'Citizen Participation' Attachment in IDIS.	No comments were not accepted.	
4	Internet Outreach	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	This is an on-going effort.	N/A	N/A	

**Table 4 – Citizen Participation Outreach**

## Expected Resources

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

#### Introduction

The City of St. Cloud prioritized goals and objectives for using CDBG funding to strategically and effectively benefit low- and moderate-income residents by supporting the creation of affordable housing, investing in public facility improvements, and supporting public services. As identified in the expected resources table below, the City of St. Cloud is expected to receive \$657,807 as its Program Year 2022 annual allocation. The City will also have \$87,770 in expected in program income generated by using a 5-year average of past program income. These estimated dollars will be directed to the St. Cloud HRA Single Family Homeowner Rehabilitation program as approved by City Council resolution. There were no prior year’s funds remaining from Program Year 2021.

#### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 5				Expected Amount Available Remainder of ConPlan \$
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	
CDBG	Public - federal	Admin and Planning Economic Dev Housing Public Improvements Public Services	600,000 +/- (expected)	NA	0	657,807	1,200,000

**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**

It is anticipated the CDBG grant funding listed above will be received annually to support activities outlined in the Annual Action Plan and Consolidated Plan. While the CDBG program does not require leveraging, other City of St. Cloud resources may be used in combination with these funds to complete the project listed in this Annual Action Plan. Leveraging is a way to increase project efficiencies which often come with combining sources of funding. Funds may be considered leveraged if financial commitments to the cost of a project from a source other than Community Development Block Grant funds are documented. City staff may identify and explore additional leveraging opportunities with project activities throughout the Program Year.

A number of other resources, including other federal, private, non-profit, local and state programs, will be used to address housing, community development and special needs in the City during Program Year 2022. Specifically, several federal sources which include NHFT, Low Income Housing Tax Credits (LIGTCs), Section 8 rental assistance programs and others as allocated to St. Cloud based on formulas. Additionally, the City receives several other federal awards including U.S. Department of Transportation, Environmental Protection Agency, and U.S. Department of Aging Services among others.

Projects awarded CDBG funds in particular will leverage federal, state, and local dollars to complete projects.

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

None.

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives

The five-year goals as stated in the 2020-2025 St. Cloud Consolidated Plan guides expenditure of the City’s annual allocation of CDBG entitlement funds. They are outlined as follows:

#### Community Goals

<b>1</b>	Goal Name	Affordable Housing
	Goal Description	Increase the supply and improve the condition of affordable owner-occupied and rental housing in the community.
<b>2</b>	Goal Name	Public Facilities and Infrastructure
	Goal Description	Provide public facilities and infrastructure meeting the needs of low-moderate income persons.
<b>3</b>	Goal Name	Support Services
	Goal Description	Reduce poverty, increase stability, and address homelessness by supporting health, well-being and self-sufficiency programs.
<b>4</b>	Goal Name	Economic Development
	Goal Description	Increase economic opportunity for residents through job training and business assistance programs.

## Priority Needs

<b>1</b>	Priority Need	Affordable Housing
<b>2</b>	Priority Need	Public Facilities & Infrastructure
<b>3</b>	Priority Need	Support Services
<b>4</b>	Priority Need	Economic Development
<b>5</b>	Priority Need	Fair Housing
<b>6</b>	Priority Need	Homelessness

# Projects

## AP-35 Projects – 91.220(d)

### Introduction

Based on application review criteria in the St. Cloud CDBG Application Guidelines and the 2020-2025 City of St. Cloud Consolidated Plan, the following activities are proposed to be undertaken in Program Year 2022 with use of federal CDBG funds.

### Projects

#	Project Name
1	St. Cloud HRA - Single Family Homeowner Housing Rehab
2	Place of Hope Main Campus - Electrical Repairs
3	Central MN Habitat for Humanity - Blighted Home Demolition
5	St. Cloud Park Department - Central Park Playground
6	Tri-CAP Project Homeless Connect
7	Program Administration

**Table 6 - Project Information**

1	<b>Project Name</b>	St. Cloud HRA - Single Family Homeowner Housing Rehab
	<b>Goals Supported</b>	Affordable Housing
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	PROPOSED CDBG: \$303,770
	<b>Description</b>	This activity provides funding for necessary improvements to homeowners in the City of St. Cloud. The goal is to help low and moderate-income families maintain their homes and make the necessary improvements to their home along with providing energy efficiency and accessibility upgrades.
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	This activity serves low-to-moderate income households by providing a deferred loan to complete necessary home improvements.
	<b>Planned Activities</b>	Provide deferred loans for rehabilitation of single-family homes improving health, safety and weatherization of homes.
2	<b>Project Name</b>	Place of Hope Main Campus - Electrical Repairs
	<b>Goals Supported</b>	Homelessness
	<b>Needs Addressed</b>	Homelessness
	<b>Funding</b>	PROPOSED CDBG: \$150,000
	<b>Description</b>	The electrical systems in all buildings on the main campus will be updated to increase the safety of guests and improve daily functioning for online treatment, educational classes, etc.
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The activity provides funding to Place of Hope to upgrade electrical of the main campus to increase safety and well-being for 85-100 guests in the shelter/transitional programs each night.
	<b>Planned Activities</b>	Upgrade electrical systems in the 9 <sup>th</sup> Avenue campus.
3	<b>Project Name</b>	Central MN Habitat for Humanity - Blighted Home Demolition
	<b>Goals Supported</b>	Affordable Housing
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	PROPOSED CDBG: \$85,000
	<b>Description</b>	The proposed CDBG funds will be used to demolish a vacant/blighted home in a LMI neighborhood to build a single-family owner-occupied home for a LMI family.

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	One LMI family.
	<b>Planned Activities</b>	Demolish vacant/blighted home in a LMI neighborhood.
5	<b>Project Name</b>	<b>St. Cloud Park Department – Central Park Playground</b>
	<b>Goals Supported</b>	Public Facilities and Infrastructure
	<b>Needs Addressed</b>	Public Facilities and Infrastructure
	<b>Funding</b>	PROPOSED CDBG: \$70,000
	<b>Description</b>	The activity provides funding for the procurement of enhanced playground equipment in the City park of Central Park. Funds will be utilized to make direct improvements to the City's park system specifically for playground equipment in this low-to-moderate income neighborhoods.
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	This park is in low-to-moderate income census tract serving the immediate residential neighborhood as well as the visitors to the area.
	<b>Planned Activities</b>	The project will enhance playground equipment in the City park of Central Park – 2807 4 <sup>th</sup> St N.
6	<b>Project Name</b>	<b>Tri-CAP Project Homeless Connect</b>
	<b>Goals Supported</b>	Homelessness
	<b>Needs Addressed</b>	Homelessness
	<b>Funding</b>	PROPOSED CDBG: \$5,000
	<b>Description</b>	Project Connect is a one-day event for individuals and families who are homeless or near homeless. The purpose of the event is to allow low income individuals and families to access services and resources at one location on the same day.
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	There will be an estimated 60 vendors providing key services such as haircuts, cell phones, health insurance, childcare, legal services and many more to persons and families experiencing homelessness.

	<b>Planned Activities</b>	Project Connect will allow low income individuals and families to access services at one location on the same day. The CDBG grant will be utilized to reimburse facility rental expenses as well as assist in boxed lunches for attendees who may be experiencing homelessness or near homelessness.
<b>9</b>	<b>Project Name</b>	<b>Program Administration (City)</b>
	<b>Funding</b>	PROPOSED CDBG: \$131,807
	<b>Description</b>	The effective planning and implementation of CDBG funding is essential to maintaining program compliance.

## **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**

The City of St. Cloud does not direct its CDBG funds to any particular geographic or areas of the City.

### **Geographic Distribution**

<b>Target Area</b>	<b>Percentage of Funds</b>
St. Cloud CDBG Target Area	70

**Table 7 - Geographic Distribution**

# Affordable Housing

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

### Introduction

The provision and preservation of affordable housing is a high priority need as illustrated by the Five-Year Consolidated Plan. Therefore, the City will continue to assist in funding existing housing programs and will also continue to work with and support other agencies in producing and preserving affordable housing to the maximum extent possible with funding made available from various federal programs. The housing needs determined to be a high priority will be given preference for CDBG funding.

The table below summarizes the 2022 CDBG funded activities designed to foster and maintain affordable housing in St. Cloud.

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

**Table 8 - One Year Goals for Affordable Housing by Support Requirement**

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

**Table 9 - One Year Goals for Affordable Housing by Support Type**

### Discussion

The provision and preservation of affordable housing is a high priority need as illustrated by the City's Five-Year Consolidated Plan and Analysis of Impediments to Fair Housing. The 2020 Analysis of Impediments to Fair Housing outlines fair housing concerns and assesses how a variety of conditions in a community contribute to housing discrimination and affect the accessibility of housing based on the arbitrary factors. These conditions may include laws, real estate practices, and local conditions that can result in impediments to fair housing choice. The process led by the City along with participation by 40+ stakeholders examining these impediments, determined goals and what actions may be taken to lessen or eliminate impacts. A summary of the impediments and associated goal is as follows:

Goal A – Lack of Sufficient Affordable Housing Supply

1. Rental housing in poor condition.
2. Insufficient housing for large families.
3. Homeownership and mortgage lending gaps.
4. Prohibitive standards for rentals (income requirements, high security deposits, no past record of credit).
5. Affordable housing and landlords accepting housing choice vouchers.

Goal B – Expand Access to Housing for Persons with Disabilities and/or In Need of Special Services

1. Shortage of affordable, accessible housing.
2. Shortage of resources to make accessibility improvements.
3. Shortage of resources to transition into independent living setting.
4. Shortage of mental health supportive services.

Goal C - Lack of Knowledge of Fair Housing Rights

1. Limited knowledge of fair housing laws and resources.
2. Availability of bi-lingual housing counselors.

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

### **Introduction**

The City of St. Cloud enjoys an excellent working relationship with St. Cloud Housing and Redevelopment Authority (HRA). The agencies work together to create and maintain affordable housing opportunities.

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

To be determined.

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

The St. Cloud Housing and Redevelopment Agency was created in 1966 to provide public housing assistance to those in need. The HRA is governed by a Board of Commissioners, consisting of seven members, who are appointed by the Mayor of St. Cloud, with ratification by the City Council. The City of St. Cloud and St. Cloud HRA have an excellent working relationship and work closely in its efforts to create and maintain affordable housing opportunities.

Currently, the HRA manages 291 units of public housing including two high-rise buildings, three 12-unit townhome complexes, and 40 scattered single-family residential homes located throughout the City. These developments are over 99% occupied year-round. Units are actively managed and maintained in excellent condition, with the assistance of capital funds provided by HUD. The HRA also provides assistance to 900+ households through the HUD funded Housing Choice Voucher Program. Also, there are a number of other specialized housing options under other federal and state government programs such as Shelter Plus Care Program, HUD CoC Rental Assistance and Section 8.

The Resident Advisory Board meets on a minimum of once per year. At the present time, the St. Cloud HRA does not have a homeownership program.

During the development of the Five-Year Consolidated Plan, the State of Minnesota reviewed the plans of public housing authorities. These plans indicate a general trend toward concepts of family self-sufficiency, individual development accounts, and homeownership programs.

Specifically, the St. Cloud HRA actively encourage residents to be involved in the organization through on-site management and active participation in housing authority decisions via surveys and other forms of engagement. The City of St. Cloud along with the St. Cloud HRA maintains an active listing of all home ownership opportunities and resources in St. Cloud and the greater metro area for residents to explore and identify potential home ownership opportunities.

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

St. Cloud Housing and Redevelopment Authority (HRA) has not been designated by the Public Housing Assessment System as “troubled.” The St. Cloud HRA is designated as a “high-performer.”

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

### **Introduction**

The St. Cloud community is committed to addressing the needs of the homeless population. The City of St. Cloud and Housing and Redevelopment Authority recognize that strategies are based on multi-agency cooperation and successful attainment of funds. The lead agency for the Central Minnesota Continuum of Care (CoC) is the Central Minnesota Housing Partnership. The City of St. Cloud participates in their public meetings which the community of providers and stakeholders are welcome to attend and provide comment. The CoC is responsible for conducting the annual count of homeless and identifying potential gaps in services regarding housing and needed homeless care. The CoC's highest priority is the implementation of the Central Region's Ten-Year Plan to End Homelessness. The City does provide referrals to entities that counsel persons that may fall into homelessness and will continue to collaborate with local public service partners who are on the front line when it comes to homelessness.

### **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 St. Cloud will continue its support of Project Connect- a one-day event for individuals and families who are homeless or near homelessness by continuing the use of CDBG funding for the event and serving on the planning committee.

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

In Program Year 2022, the City of St. Cloud continues efforts to address emergency shelter and transitional housing needs of homeless individuals and families, to prevent low-income individuals and families with children from becoming homeless, to help homeless persons make the transition to permanent housing and independent living, and to address chronic homelessness will occur primarily through an ongoing partnership with the Central MN Continuum of Care Consortium (CoC).

The CoC includes 14 rural/metro counties. The CoC's goals in their "10-Year Plan to End Homelessness in 14 Counties Report" is to prevent homelessness, provide coordinated outreach, develop housing opportunities, improve service delivery, and build capacity for self-support. CoC membership includes individuals, agencies, and traditional homeless service providers representing homeless persons. Services include transitional and permanent supportive housing, emergency shelter, loan programs, and foreclosure prevention.

#### **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**

Permanent housing for homeless is a top priority for this region. Working to help transition families to permanent housing and low-income renters to becoming homeowners will require the cooperation of local, state and federal agencies and funding plus the involvement of the private sector housing. The City will continue to support the City's Economic Development Department in its effort to enhance St. Cloud's economic vitality and expanding the city's tax and employment base as well as partner with the Continuum of Care and move forward their efforts and with the local agencies that address these needs specifically. These agencies include Anna Marie's Alliance, Salvation Army, Tri-County Action Program, Catholic Charities, Central MN Ren-Entry Project, Place of Hope, and Lutheran Social Services of MN.

The 2020-2025 City of St. Cloud Consolidated Plan provides further detail on priority homeless needs and homeless inventory of emergency shelters, transitional housing, and permanent housing with support services. The 2019 Comprehensive Housing Needs Analysis Community Housing Study provides further detail on priority homeless needs and homeless inventory of emergency shelters, transitional housing, and permanent housing with support services as well as recommendations designed to address housing and homeless needs.

**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 Central MN CoC utilizes the Healthy Transitions model to help foster youth transition to independence and stable housing. The State is primarily responsible for the care of individuals within publicly funded institutions. Central MN CoC instilled a collaborative approach that includes staff from child protection services, housing departments, mental health, public health, foster care and other service providers to assist youth transitioning from foster care to develop a discharge plan with their assigned county case manager that must include housing and employment options. The CoC/Heading Home Central MN uses state and private resources to increase the number of permanent and transitional housing for youth leaving foster care. The Minnesota Department of Human Services has directed counties to develop discharge plans with all youth beginning at age 16. All 5 goals in the Ten-Year Plan pertain to preventing and ending homelessness among the youth. The main goal of the Catholic Charities homeless youth program is prevention (to never become homeless) as well as self-sufficiency. Lutheran Social Services provides independent living skills instruction to youth leaving the foster care system.

The Central MN CoC/Heading Home Central MN's Ten-Year Plan to End Homelessness has

representatives from the local county mental health units who have developed housing options for persons with mental illness released from state facilities using state and private resources. Such housing options include adult foster care, shared living arrangements, and state rental subsidies. Central MN CoC partner agencies work with hospitals and mental health providers to provide seamless housing to people leaving those institutional settings. Per state mandate, all persons committed to any of the state regional treatment facilities are assigned a mental health case manager. Discharge planning begins while the individual is committed and before the person is discharged. Housing remains a part of the treatment plan after discharge to ensure housing is maintained/sustained.

All the Central MN CoC partner agencies will continue to close discharge gaps by continuing to work with and maintain relationships with mental health facilities, County Drug Courts, chemical dependency treatment centers, to encourage early contact with "Next Step" housing resources to initiate housing related credential restoration, support system development and housing search agendas supported by their current case managers. Central MN CoC has representatives from the local county mental health units who have developed housing options for persons with mental illness released from state facilities using state and private resources. Multiple mental health service providers are active members of the Central MN CoC and provide housing and services to persons leaving Mental Health Facilities using non-HUD McKinney-Vento resources. These providers ensure that persons are not discharged to homelessness.

Stearns County Jail has implemented the Release Advance Planning (RAP) group. Every week a group of 8-10 professional volunteers meet with an inmate to assist transitioning out of incarceration. The volunteer professionals are from Stearns County, Street Outreach, Workforce Center, Mental Health Unit, MN Department of Corrections (DOC) and work with members of the CoC to eliminate significant barriers to rehousing ex-offenders. The Central Minnesota Re-Entry Project (CMNRP) provides ex-offenders transitional housing and links offenders to people and organizations that provide jobs, housing, and volunteer mentoring in the 14 county CoC area. CMNRP offers ex-offenders the opportunity to participate at least 120 days prior to their release from prison or jail.

## **Discussion**

The 2020-2025 Consolidated Plan provides further detail on priority homeless needs and homeless inventory of emergency shelters, transitional housing, and permanent housing with support services. The 2019 Community Housing Study also provides further detail on priority homeless needs and homeless inventory of emergency shelters, transitional housing, and permanent housing with support services as well as recommendations designed to address housing and homeless needs.

The City of St. Cloud works to reduce the number of poverty-level families by promoting economic development, partnering with the Continuum of Care (COC) and with the local service providers to address the identified needs of poverty-level families including: housing, job training, employment opportunities, child care resources, criminal background barriers, and access to services.

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

### **Introduction:**

The City of St. Cloud consulted with several local service providers, city departments, and local organizations while formulating the 2020-2025 Consolidated Plan as well as 2020 Analysis of Impediments to Fair Housing. The consultation process primarily consisted of outreach to local organizations through community forums, meetings, surveys and focus groups. Housing providers, social service providers, private housing professionals, mental health professionals, social service agencies, bankers and other local funders were consulted in developing both documents. Public hearings were held providing time to City Council members, community agencies and citizens to ask clarifying questions, accept further public comment and confirm the priority needs identified through the public forums, surveys and focus groups and adopted in the 2020-2025 Consolidated Plan. The 2020-2025 Consolidated Plan is available online, hard copy at City Hall along with the 2020 Analysis of Impediments to Fair Housing, Annual Action Plans, CAPERS, Citizen Participation Plan and 2019 Community Housing Study.

### **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**

Based on the Analysis of Impediments to Fair Housing Plan, no public policies have been identified as barriers or as having a negative effect upon the availability of affordable housing. Therefore, the City does not propose any reform measures. The Analysis of Impediments provides critical framework to plan and implement actions to overcome identified impediments to fair housing choice going forward. The impediments identified through the AI process in 2020 are listed below. Efforts to address these impediments will be made during the five-year period covered by the Consolidated Plan.

#### Goal A – Lack of Sufficient Affordable Housing Supply

1. Rental housing in poor condition.
2. Insufficient housing for large families.
3. Homeownership and mortgage lending gaps.
4. Prohibitive standards for rentals (income requirements, high security deposits, no past record of credit).
5. Affordable housing and landlords accepting housing choice vouchers.

#### Goal B – Expand Access to Housing for Persons with Disabilities and/or In Need of Special Services

1. Shortage of affordable, accessible housing.
2. Shortage of resources to make accessibility improvements.
3. Shortage of resources to transition into independent living setting.
4. Shortage of mental health supportive services.

#### Goal C - Lack of Knowledge of Fair Housing Rights

1. Limited knowledge of fair housing laws and resources.
2. Availability of bi-lingual housing counselors.

## **AP-85 Other Actions – 91.220(k)**

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

No obstacles were identified in meeting underserved needs; therefore, no specific actions will be taken. The City of St. Cloud is committed to soliciting greater involvement from traditionally underserved populations. This is done through notification of social service providers about the need's assessment hearings at the start of the planning process.

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

The City of St. Cloud will continue to administer existing housing programs and will also continue to work with and support other agencies in producing and preserving affordable housing to the maximum extent possible with funding made available from various federal programs.

The City of St. Cloud has also identified the following Five-Year goals all of which address some aspect of affordable housing and associated quality of life for low-to-moderate income persons:

- Affordable Housing: Increase the supply and improve the condition of affordable owner-occupied and rental housing in the community.
- Public Facilities and Infrastructure: Provide public facilities and infrastructure meeting the needs of low-moderate income persons.
- Support Services: Reduce poverty, increase stability, and address homelessness by supporting health, well-being and self-sufficiency programs.
- Economic Development: Increase economic opportunity for residents through job training and business assistance programs.

The City of St. Cloud has identified through its consolidated planning process the priority needs: Affordable Housing; Public Facilities and Infrastructure; Support Services; Economic Development; Fair Housing; and Homelessness.

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

The Single-Family Homeowner Rehabilitation Program will continue in 2022. As part of rehabilitation projects, lead-based paint hazards are identified and remediated in compliance with federal lead-based paint requirements.

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

The City will continue to support agencies aiding low-income families through traditional means as well as CDBG funding. These programs and tools are being provided with the intent of improving families' living situations hopefully to the point that they are no longer living in poverty. One such tool is the St. Cloud Vista project which provides a full-time staff person to research the barriers to sustainable employment

through workforce development and identify new and emerging best practices. Additionally, the City will continue in its Economic Development efforts to attract new businesses and jobs to the City and encourage the expansion of existing businesses. The approach of the City has been successful as St. Cloud has the fastest labor force growth in the State of Minnesota and U.S. since 2005. The City's economic development efforts have generally resulted in increased job opportunities for households of all income levels throughout the area.

Finally, St. Cloud is fortunate to boast the ever-expanding supply of training and educational resources to prepare workers for all types of career opportunities. St. Cloud is home to several higher educational facilities including Minnesota's second-largest university, St. Cloud State University. Also, other local institutions include St. Cloud Community & Technical College, Rasmussen College, Minnesota School of Business, College of St. Scholastica, and College of St. Benedict and St. John's University.

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

St. Cloud is fortunate to have numerous private non-profit agencies that play a role in the delivery of housing and housing related services to low-income households. There is no lack of concern for special needs populations and homeless people.

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

The City of St. Cloud has a long track record of successful partnerships among public and private sector entities. The delivery system for the HUD grant programs is no exception. Communication and cooperation between the City Departments and partner agencies and organizations that administer activities is strong. City staff continue to work closely with the other partner organizations to improve regulatory compliance, monitoring, cooperation and partnerships among agencies and technical capacity of organizations involved in project delivery. To enhance coordination between public and private housing and social service agencies, the City will continue consulting with and inviting the participation of a wide variety of agencies and organizations involved in the delivery of housing and supportive services to low- and moderate-income residents in St. Cloud — particularly the CDBG Target Areas and public housing residents.

### **Discussion:**

Please see above.

## **AP-90 Program-Specific Requirements – §CDBG 91.220(I)(1)**

In the implementation of programs and activities under the Program Year 2022 Annual Action Plan, the City of St. Cloud will follow all HUD regulations concerning the use of HUD funds in addition to adherence to the St. Cloud Citizen Participation Plan.