

**St. Clair County  
Housing Authority's  
2024 Agency Plan Update**

**April 10, 2024**

<b>Annual PHA Plan</b> <i>(Standard PHAs and Troubled PHAs)</i>	<b>U.S. Department of Housing and Urban Development</b> <b>Office of Public and Indian Housing</b>	<b>OMB No. 2577-0226</b> <b>Expires: 03/31/2024</b>
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**Purpose.** The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, including changes to these policies, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families.

**Applicability.** The Form HUD-50075-ST is to be completed annually by **STANDARD PHAs** or **TROUBLED PHAs**. PHAs that meet the definition of a High Performer PHA, Small PHA, HCV-Only PHA or Qualified PHA do not need to submit this form.

**Definitions.**

- (1) **High-Performer PHA** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers, and was designated as a high performer on both the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments if administering both programs, or PHAS if only administering public housing.
- (2) **Small PHA** - A PHA that is not designated as PHAS or SEMAP troubled, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceed 550.
- (3) **Housing Choice Voucher (HCV) Only PHA** - A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.
- (4) **Standard PHA** - A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceed 550, and that was designated as a standard performer in the most recent PHAS or SEMAP assessments.
- (5) **Troubled PHA** - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
- (6) **Qualified PHA** - A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined and is not PHAS or SEMAP troubled.

<b>A.</b>	<b>PHA Information.</b>																																
A.1	<p>PHA Name: <u>St. Clair County Housing Authority</u> PHA Code: <u>IL030</u>          PHA Type: <input checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA          PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>07/2024</u>          PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)          Number of Public Housing (PH) Units <u>949</u> Number of Housing Choice Vouchers (HCVs) <u>2,695</u> Total Combined Units/Vouchers          PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission</p> <p><b>Availability of Information.</b> PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.</p> <p><input type="checkbox"/> <b>PHA Consortia:</b> (Check box if submitting a Joint PHA Plan and complete table below)</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th rowspan="2">Participating PHAs</th> <th rowspan="2">PHA Code</th> <th rowspan="2">Program(s) in the Consortia</th> <th rowspan="2">Program(s) not in the Consortia</th> <th colspan="2">No. of Units in Each Program</th> </tr> <tr> <th>PH</th> <th>HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV	Lead PHA:																							
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<b>B.</b>	<b>Plan Elements</b>
<b>B.1</b>	<p><b>Revision of Existing PHA Plan Elements.</b></p> <p>(a) Have the following PHA Plan elements been revised by the PHA?</p> <p>Y N</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs (See Attachment B.1A)</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. (See Attachment B.1B)</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Financial Resources. (See Attachment B.1C)</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Rent Determination. (See Attachment B.1D)</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Operation and Management. (See Attachment B.1E)</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Grievance Procedures.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Homeownership Programs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Community Service and Self-Sufficiency Programs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Safety and Crime Prevention.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Pet Policy.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Asset Management. (See Attachment B.1F)</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Substantial Deviation.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Significant Amendment/Modification</p> <p>(b) If the PHA answered yes for any element, describe the revisions for each revised element(s):</p> <p>Annual update to reflect current data, statistics, and/or projections. See referenced attachments for further details</p> <p>(c) The PHA must submit its Deconcentration Policy for Field Office review.</p>
<b>B.2</b>	<p><b>New Activities.</b></p> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?</p> <p>Y N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Hope VI or Choice Neighborhoods.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Mixed Finance Modernization or Development.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Demolition and/or Disposition. (See below)</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Designated Housing for Elderly and/or Disabled Families.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Tenant-Based Assistance.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD. (See below)</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Over-Income Families.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Police Officers.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Non-Smoking Policies.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Project-Based Vouchers. (See Attachment #B.2A)</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Units with Approved Vacancies for Modernization.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants). (See Attachment #B.2B)</p> <p>(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan.</p> <p>SCCHA received HUD approval of its demolition application for 102 units in the Ernest Smith St. Apts., Amp 3, Cahokia Heights, the #30-08 portion of this development. SCCHA applied for 59 Replacement Tenant Protection Vouchers to replace the demolished P/H units and received 33 TPVs in 2022. SCCHA chose not apply for the remaining 26 potential TPVs in 2023 due to under-utilization in its traditional HCVP. SCCHA submitted an application to convert from public housing to project-based vouchers 20 units in O'Fallon (30-24) and 24 units in Lebanon (30-14) and HUD issued a CHAP (Commitment to Enter into a Housing Assistance Payment Contract). SCCHA is working on completing the conversion. SCCHA anticipates submitting a conversion application for the 44-unit family public housing development in the Alorton neighborhood of Cahokia Heights (Hawthorne Terrace) in 2024.</p> <p>SCCHA awarded 75 +/- project-based vouchers to promote affordable housing developments receiving LIHTC through the Illinois Housing Development Authority (IHDA). The proposed developments are located in Cahokia Heights (3) and Swansea. Only one of these developments is being considered by IHDA (16 units in CH). This project is anticipated to move to A-HAP stage in early 2024. SCCHA entered into a PBV-A-HAP for two previously awarded PBV developments in 2023 (50 units at The New Broadview development and 10 units at the Winstanley Park development both located in ESL).</p> <p>The above activities are consistent with the SCCHA Annual Plan because they either maintain existing or promote the development of new affordable housing opportunities.</p>

B.3	<p><b>Progress Report.</b></p> <p>Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan. See Attachment #B.3</p>
B.4	<p><b>Capital Improvements.</b> Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.</p> <p>The Capital Fund Program Five-Year Action Plan was approved by HUD 6/26/23</p>
B.5	<p><b>Most Recent Fiscal Year Audit.</b></p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N  <input checked="" type="checkbox"/> <input type="checkbox"/> (See audit narrative statement in Attachment B.5)</p> <p>(b) If yes, please describe: Auditors determined the error rate in projecting annual income for participants in the HCVP to be too high.</p>
<p><b>C. Other Document and/or Certification Requirements.</b></p>	
C.1	<p><b>Resident Advisory Board (RAB) Comments.</b></p> <p>(a) Did the RAB(s) have comments to the PHA Plan?</p> <p>Y N  <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p> <p>See Attachment #C.1</p>
C.2	<p><b>Certification by State or Local Officials.</b></p> <p>Form HUD-50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p> <p>See Attachment #C.2</p>
C.3	<p><b>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</b></p> <p>Form HUD-50077-ST-HCV-HP, <i>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p> <p>See Attachment #C.3</p>
C.4	<p><b>Challenged Elements.</b> If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y N  <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>If yes, include Challenged Elements.</p>

C.5	<p><b>Troubled PHA.</b>  (a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?  Y   N   N/A  <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p>				
D.	<p><b>Affirmatively Furthering Fair Housing (AFFH).</b></p>				
D.1	<p><b>Affirmatively Furthering Fair Housing (AFFH).</b></p> <p>Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.</p> <table border="1" data-bbox="191 863 1464 1314"> <tr> <td data-bbox="191 863 1464 905"> <p><b>Fair Housing Goal:</b></p> </td> </tr> <tr> <td data-bbox="191 905 1464 1314"> <p><i>Describe fair housing strategies and actions to achieve the goal</i></p> <p><b>SCCHA is not required to submit an Assessment of Fair Housing at this time.</b></p> </td> </tr> </table> <table border="1" data-bbox="191 1339 1464 1755"> <tr> <td data-bbox="191 1339 1464 1381"> <p><b>Fair Housing Goal:</b></p> </td> </tr> <tr> <td data-bbox="191 1381 1464 1755"> <p><i>Describe fair housing strategies and actions to achieve the goal</i></p> <p><b>SCCHA is not required to submit an Assessment of Fair Housing at this time.</b></p> </td> </tr> </table>	<p><b>Fair Housing Goal:</b></p>	<p><i>Describe fair housing strategies and actions to achieve the goal</i></p> <p><b>SCCHA is not required to submit an Assessment of Fair Housing at this time.</b></p>	<p><b>Fair Housing Goal:</b></p>	<p><i>Describe fair housing strategies and actions to achieve the goal</i></p> <p><b>SCCHA is not required to submit an Assessment of Fair Housing at this time.</b></p>
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**Fair Housing Goal:**

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## Instructions for Preparation of Form HUD-50075-ST Annual PHA Plan for Standard and Troubled PHAs

**A. PHA Information.** All PHAs must complete this section. (24 CFR §903.4)

**A.1** Include the full PHA Name, PHA Code, PHA Type, PHA Fiscal Year Beginning (MM/YYYY), PHA Inventory, Number of Public Housing Units and or Housing Choice Vouchers (HCVs), PHA Plan Submission Type, and the Availability of Information, specific location(s) of all information relevant to the public hearing and proposed PHA Plan. (24 CFR §903.23(4)(c))

**PHA Consortia:** Check box if submitting a Joint PHA Plan and complete the table. (24 CFR §943.128(a))

**B. Plan Elements.** All PHAs must complete this section.

**B.1 Revision of Existing PHA Plan Elements.** PHAs must:

Identify specifically which plan elements listed below that have been revised by the PHA. To specify which elements have been revised, mark the "yes" box. If an element has not been revised, mark "no." (24 CFR §903.7)

**Statement of Housing Needs and Strategy for Addressing Housing Needs.** Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA's strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income), (ii) elderly families (iii) households with individuals with disabilities, and households of various races and ethnic groups residing in the jurisdiction or on the public housing and Section 8 tenant-based assistance waiting lists based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The statement of housing needs shall be based on information provided by the applicable Consolidated Plan, information provided by HUD, and generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. Once the PHA has submitted an Assessment of Fair Housing (AFH), which includes an assessment of disproportionate housing needs in accordance with 24 CFR §5.154(d)(2)(iv), information on households with individuals with disabilities and households of various races and ethnic groups residing in the jurisdiction or on the waiting lists no longer needs to be included in the Statement of Housing Needs and Strategy for Addressing Housing Needs. (24 CFR §903.7(a)).

The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. (24 CFR §903.7(a)(2)(i)) Provide a description of the ways in which the PHA intends, to the maximum extent practicable, to address those housing needs in the upcoming year and the PHA's reasons for choosing its strategy. (24 CFR §903.7(a)(2)(ii))

**Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.** PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see 24 CFR 903.2. (24 CFR §903.23(b)) Describe the PHA's admissions policy for deconcentration of poverty and income mixing of lower-income families in public housing. The Deconcentration Policy must describe the PHA's policy for bringing higher income tenants into lower income developments and lower income tenants into higher income developments. The deconcentration requirements apply to general occupancy and family public housing developments.

Refer to 24 CFR §903.2(b)(2) for developments not subject to deconcentration of poverty and income mixing requirements. (24 CFR §903.7(b)) Describe the PHA's procedures for maintain waiting lists for admission to public housing and address any site-based waiting lists. (24 CFR §903.7(b)). A statement of the PHA's policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV. (24 CFR §903.7(b)) Describe the unit assignment policies for public housing. (24 CFR §903.7(b))

**Financial Resources.** A statement of financial resources, including a listing by general categories, of the PHA's anticipated resources, such as PHA operating, capital and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support public housing or tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program, and state the planned use for the resources. (24 CFR §903.7(c))

**Rent Determination.** A statement of the policies of the PHA governing rents charged for public housing and HCV dwelling units, including applicable public housing flat rents, minimum rents, voucher family rent contributions, and payment standard policies. (24 CFR §903.7(d))

**Operation and Management.** A statement of the rules, standards, and policies of the PHA governing maintenance and management of housing owned, assisted, or operated by the public housing agency (which shall include measures necessary for the prevention or eradication of pest infestation, including cockroaches), and management of the PHA and programs of the PHA. (24 CFR §903.7(e))

**Grievance Procedures.** A description of the grievance and informal hearing and review procedures that the PHA makes available to its residents and applicants. (24 CFR §903.7(f))

**Homeownership Programs.** A description of any Section 5h, Section 32, Section 8y, or HOPE 1 public housing or Housing Choice Voucher (HCV) homeownership programs (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval. (24 CFR §903.7(k))

**Community Service and Self Sufficiency Programs.** Describe how the PHA will comply with the requirements of (24 CFR §903.7(l)). Provide a description of: 1) Any programs relating to services and amenities provided or offered to assisted families; and 2) Any policies or programs of the PHA for the enhancement of the economic and social self-sufficiency of assisted families, including programs subject to Section 3 of the Housing and Urban Development Act of 1968 (24 CFR Part 135) and FSS. (24 CFR §903.7(l))

**Safety and Crime Prevention (VAWA).** Describe the PHA's plan for safety and crime prevention to ensure the safety of the public housing residents. The statement must provide development-by-development or jurisdiction wide-basis: (i) A description of the need for measures to ensure the safety of public housing residents; (ii) A description of any crime prevention activities conducted or to be conducted by the PHA; and (iii) A description of the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities. (24 CFR §903.7(m)) A description of: 1) Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking; 2) Any activities, services, or programs provided or offered by a PHA that helps child and adult victims of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and 3) Any activities, services, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families. (24 CFR §903.7(m)(5))

**Pet Policy.** Describe the PHA's policies and requirements pertaining to the ownership of pets in public housing. (24 CFR §903.7(n))

**Asset Management.** State how the agency will carry out its asset management functions with respect to the public housing inventory of the agency, including how the agency will plan for the long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs for such inventory. (24 CFR §903.7(q))

**Substantial Deviation.** PHA must provide its criteria for determining a "substantial deviation" to its 5-Year Plan. (24 CFR §903.7(r)(2)(i))

**Significant Amendment/Modification.** PHA must provide its criteria for determining a "Significant Amendment or Modification" to its 5-Year and Annual Plan. For modifications resulting from the Rental Assistance Demonstration (RAD) program, refer to the "Sample PHA Plan Amendment" found in Notice PIH-2012-32 REV-3, successor RAD Implementation Notices, or other RAD Notices.

If any boxes are marked "yes", describe the revision(s) to those element(s) in the space provided.

PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see 24 CFR 903.2 (24 CFR §903.23(b))

**B.2 New Activities.** If the PHA intends to undertake any new activities related to these elements in the current Fiscal Year, mark "yes" for those elements, and describe the activities to be undertaken in the space provided. If the PHA does not plan to undertake these activities, mark "no."

**HOPE VI or Choice Neighborhoods.** 1) A description of any housing (including project number (if known) and unit count) for which the PHA will apply for HOPE VI or Choice Neighborhoods; and 2) A timetable for the submission of applications or proposals. The application and approval process for HOPE VI or Choice Neighborhoods is a separate process. See guidance on HUD's website at:

[https://www.hud.gov/program\\_offices/public\\_indian\\_housing/programs/ph/hopec6](https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hopec6). (Notice PIH 2011-47)

**Mixed Finance Modernization or Development.** 1) A description of any housing (including project number (if known) and unit count) for which the PHA will apply for Mixed Finance Modernization or Development; and 2) A timetable for the submission of applications or proposals. The application and approval process for Mixed Finance Modernization or Development is a separate process. See guidance on HUD's website at:

[https://www.hud.gov/program\\_offices/public\\_indian\\_housing/programs/ph/hopec6/mfph#4](https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hopec6/mfph#4)

**Demolition and/or Disposition.** With respect to public housing only, describe any public housing development(s), or portion of a public housing development projects, owned by the PHA and subject to ACCs (including project number and unit numbers [or addresses]), and the number of affected units along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition approval under section 18 of the 1937 Act (42 U.S.C. 1437p); and (2) A timetable for the demolition or disposition. This statement must be submitted to the extent that approved

and/or pending demolition and/or disposition has changed as described in the PHA's last Annual and/or 5-Year PHA Plan submission. The application and approval process for demolition and/or disposition is a separate process. Approval of the PHA Plan does not constitute approval of these activities. See guidance on HUD's website at: [http://www.hud.gov/offices/pih/centers/sac/demo\\_dispo/index.cfm](http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm). (24 CFR §903.7(h))

**Designated Housing for Elderly and Disabled Families.** Describe any public housing projects owned, assisted or operated by the PHA (or portions thereof), in the upcoming fiscal year, that the PHA has continually operated as, has designated, or will apply for designation for occupancy by elderly and/or disabled families only. Include the following information: 1) development name and number; 2) designation type; 3) application status; 4) date the designation was approved, submitted, or planned for submission; 5) the number of units affected and; 6) expiration date of the designation of any HUD approved plan. Note: The application and approval process for such designations is separate from the PHA Plan process, and PHA Plan approval does not constitute HUD approval of any designation. (24 CFR §903.7(j)(C))

**Conversion of Public Housing under the Voluntary or Mandatory Conversion programs.** Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA is required to convert or plans to voluntarily convert to tenant-based assistance; 2) An analysis of the projects or buildings required to be converted; and 3) A statement of the amount of assistance received to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD's website at:

<http://www.hud.gov/offices/pih/centers/sac/conversion.cfm>. (24 CFR §903.7(j))

**Conversion of Public Housing under the Rental Assistance Demonstration (RAD) program.** Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA plans to voluntarily convert to Project-Based Rental Assistance or Project-Based Vouchers under RAD. See additional guidance on HUD's website at: [Notice PIH 2012-32 REV-3](#), [successor RAD Implementation Notices](#), and [other RAD notices](#).

**Occupancy by Over-Income Families.** A PHA that owns or operates fewer than two hundred fifty (250) public housing units, may lease a unit in a public housing development to an over-income family (a family whose annual income exceeds the limit for a low income family at the time of initial occupancy), if all the following conditions are satisfied: (1) There are no eligible low income families on the PHA waiting list or applying for public housing assistance when the unit is leased to an over-income family; (2) The PHA has publicized availability of the unit for rental to eligible low income families, including publishing public notice of such availability in a newspaper of general circulation in the jurisdiction at least thirty days before offering the unit to an over-income family; (3) The over-income family rents the unit on a month-to-month basis for a rent that is not less than the PHA's cost to operate the unit; (4) The lease to the over-income family provides that the family agrees to vacate the unit when needed for rental to an eligible family; and (5) The PHA gives the over-income family at least thirty days notice to vacate the unit when the unit is needed for rental to an eligible family. The PHA may incorporate information on occupancy by over-income families into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD's website at: [Notice PIH 2011-7](#) (24 CFR 960.503) (24 CFR 903.7(b))

**Occupancy by Police Officers.** The PHA may allow police officers who would not otherwise be eligible for occupancy in public housing, to reside in a public housing dwelling unit. The PHA must include the number and location of the units to be occupied by police officers, and the terms and conditions of their tenancies; and a statement that such occupancy is needed to increase security for public housing residents. A "police officer" means a person determined by the PHA to be, during the period of residence of that person in public housing, employed on a full-time basis as a duly licensed professional police officer by a Federal, State or local government or by any agency of these governments. An officer of an accredited police force of a housing agency may qualify. The PHA may incorporate information on occupancy by police officers into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD's website at: [Notice PIH 2011-7](#). (24 CFR 960.505) (24 CFR 903.7(b))

**Non-Smoking Policies.** The PHA may implement non-smoking policies in its public housing program and incorporate this into its PHA Plan statement of operation and management and the rules and standards that will apply to its projects. See additional guidance on HUD's website at: [Notice PIH 2009-21](#) and [Notice PIH-2017-03](#). (24 CFR §903.7(e))

**Project-Based Vouchers.** Describe any plans to use Housing Choice Vouchers (HCVs) for new project-based vouchers, which must comply with PBV goals, civil rights requirements, Housing Quality Standards (HQS) and deconcentration standards, as stated in 983.57(b)(1) and set forth in the PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. If using project-based vouchers, provide the projected number of project-based units and general locations, and describe how project-basing would be consistent with the PHA Plan (24 CFR §903.7(b)).

**Units with Approved Vacancies for Modernization.** The PHA must include a statement related to units with approved vacancies that are undergoing modernization in accordance with [24 CFR §990.145\(a\)\(1\)](#).

**Other Capital Grant Programs** (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

For all activities that the PHA plans to undertake in the current Fiscal Year, provide a description of the activity in the space provided.

**B.3 Progress Report.** For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year PHA Plan. (24 CFR §903.7(r)(1))

**B.4 Capital Improvements.** PHAs that receive funding from the Capital Fund Program (CFP) must complete this section (24 CFR §903.7(g)). To comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan in EPIC and the date that it was approved. PHAs can reference the form by including the following language in the Capital Improvement section of the appropriate Annual or Streamlined PHA Plan Template: "See Capital Fund 5 Year Action Plan in EPIC approved by HUD on XX/XX/XXXX."

**B.5 Most Recent Fiscal Year Audit.** If the results of the most recent fiscal year audit for the PHA included any findings, mark "yes" and describe those findings in the space provided. (24 CFR §903.7(p))

### C. Other Document and/or Certification Requirements.

**C.1 Resident Advisory Board (RAB) comments.** If the RAB had comments on the annual plan, mark "yes," submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA's decision made on these recommendations. (24 CFR §903.13(c), 24 CFR §903.19)



**C.2 Certification by State of Local Officials.** Form HUD-50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan. (24 CFR §903.15). Note: A PHA may request to change its fiscal year to better coordinate its planning with planning done under the Consolidated Plan process by State or local officials as applicable.

**C.3 Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.** Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-50077 ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed*. Form HUD-50077-ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed* must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the certification requirement to affirmatively further fair housing if the PHA fulfills the requirements of §§ 903.7(o)(1) and 903.15(d) and: (i) examines its programs or proposed programs; (ii) identifies any fair housing issues and contributing factors within those programs, in accordance with 24 CFR 5.154 or 24 CFR 5.160(a)(3) as applicable; (iii) specifies actions and strategies designed to address contributing factors, related fair housing issues, and goals in the applicable Assessment of Fair Housing consistent with 24 CFR 5.154 in a reasonable manner in view of the resources available, (iv) works with jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; (v) operates programs in a manner consistent with any applicable consolidated plan under 24 CFR part 91, and with any order or agreement, to comply with the authorities specified in paragraph (o)(1) of this section; (vi) complies with any contribution or consultation requirement with respect to any applicable AFH, in accordance with 24 CFR 5.150 through 5.180; (vii) maintains records reflecting these analyses, actions, and the results of these actions; and (viii) takes steps acceptable to HUD to remedy known fair housing or civil rights violations, impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction. (24 CFR §903.7(o)).

**C.4 Challenged Elements.** If any element of the Annual PHA Plan or 5-Year PHA Plan is challenged, a PHA must include such information as an attachment to the Annual PHA Plan or 5-Year PHA Plan with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.

**C.5 Troubled PHA.** If the PHA is designated troubled, and has a current MOA, improvement plan, or recovery plan in place, mark "yes," and describe that plan. Include dates in the description and most recent revisions of these documents as attachments. If the PHA is troubled, but does not have any of these items, mark "no." If the PHA is not troubled, mark "N/A." (24 CFR §903.9)

#### **D. Affirmatively Furthering Fair Housing (AFFH).**

**D.1 Affirmatively Furthering Fair Housing.** The PHA will use the answer blocks in item D.1 to provide a statement of its strategies and actions to implement each fair housing goal outlined in its accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5) that states, in relevant part: "To implement goals and priorities in an AFH, strategies and actions shall be included in program participants' ... PHA Plans (including any plans incorporated therein) ... Strategies and actions must affirmatively further fair housing ...." Use the chart provided to specify each fair housing goal from the PHA's AFH for which the PHA is the responsible program participant – whether the AFH was prepared solely by the PHA, jointly with one or more other PHAs, or in collaboration with a state or local jurisdiction – and specify the fair housing strategies and actions to be implemented by the PHA during the period covered by this PHA Plan. If there are more than three fair housing goals, add answer blocks as necessary.

Until such time as the PHA is required to submit an AFH, the PHA will not have to complete section D., nevertheless, the PHA will address its obligation to affirmatively further fair housing in part by fulfilling the requirements at 24 CFR 903.7(o)(3) enacted prior to August 17, 2015, which means that it examines its own programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintain records reflecting these analyses and actions. Furthermore, under Section 5A(d)(15) of the U.S. Housing Act of 1937, as amended, a PHA must submit a civil rights certification with its Annual PHA Plan, which is described at 24 CFR 903.7(o)(1) except for qualified PHAs who submit the Form HUD-50077-CR as a standalone document.

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the 5-Year and Annual PHA Plan.

Public reporting burden for this information collection is estimated to average 7.52 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

**Privacy Act Notice.** The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality.

## ATTACHMENTS

## **SUMMARY OF ATTACHMENTS**

**Attachment #B.1A – Statement of Housing Needs and Strategy for Addressing Housing Needs**

**Attachment #B.1B – Deconcentration Policy Statement and Analysis**

**Attachment #B.1C - Statement of Financial Resources**

**Attachment #B.1D – Approved Changes in Operation and Management Policies**

- 2024 Public Housing Utility Allowance Schedule (B.1D1)
- 2024 Housing Choice Voucher Program Utility Allowance Schedule (B.1D2)
- 2024 Housing Choice Voucher Program Payment Standard (B.1D3)
- 2024 PH Flat Rent Schedule (Based upon 2024 SAFMRs) [B.1D4]
- Anticipated Revisions to the HCVP Administrative Plan (B.1D5)
- Anticipated Revisions to the Public Housing Admission and Continued Occupancy Policy [ACOP] (B.1D6)

**Attachment #B.1D1 – 2024 Public Housing Utility Allowance Schedule**

**Attachment #B.1D2 – 2024 HCVP Utility Allowance Schedule**

**Attachment #B.1.D3 – 2024 Housing Choice Voucher Program Payment Standard**

**Attachment #B.1D4 – 2024 Public Housing Flat Rent Schedule (Based upon 2024 SAFMRs)**

**Attachment #B.1D5 – Anticipated Revisions to the HCVP Administrative Plan**

**Attachment #B.1D6 – Anticipated Revisions to the Public Housing ACOP  
(Admissions and Continued Occupancy Policy)**

**Attachment #B.1E – Asset Management Table**

**Attachment #B.2A – Statement Regarding Use of Project-Based Vouchers Mixed Finance, Modernization or Development, Demolition and/or Disposition, and Conversion of Public Housing**

**Attachment #B.2B – Capital Fund Emergency Safety and Security Grants**

**Attachment #B.3A - Statement of Progress in Meeting Mission and Goals (5 Year Plan)**

**Attachment #B.3B - Statement of Progress in Meeting Annual Goals (2023 - 2024)**

**Attachment #B.5 – Narrative Statement Regarding Financial Audit**

**Attachment #C.1 – Resident Advisory Board Comments**

**Attachment #C.2 – Certification by State or Local Official**

**Attachment #C.3 – Form HUD-50077, PHA Certifications of Compliance with the PHA  
Plans and Related Regulations (Civil Rights Certification)  
(Form HUD-50077-ST-HCV-HP)**

**Attachment #C.4 – Certification of No Challenged Elements**

**Exhibits**

**Exhibit #1 – Carbon Monoxide Detector Law Compliance Statement**

**Exhibit #2 – Annual Plan Goals for Agency Plan Period 7/1/2024 – 6/30/2025**

**Exhibit #3 – Policy Excerpts Related to VAWA (Violence Against Women Act)**

**Attachment #B.1A – Statement of Housing Needs and Strategy for Addressing  
Housing Needs**

**Statement of Housing Needs and  
Strategy for Addressing Housing Needs (updated for APU 2024)**

**Statement of Housing Needs**

**A. Housing Needs of Families in the Jurisdiction/s Served by the PHA**

*Note: The most recent data available regarding housing need in the jurisdiction is the St. Clair County Consolidated Plan 2020 – 2024 compiled by the St. Clair County Intergovernmental Grants Department (SCC-IGD). SCCHA relies heavily on the County’s Consolidated Plan to identify the housing needs of families in St. Clair County. St. Clair County will be updating the Consolidated Plan for 2025 – 2029, but at this time the CP 2020 – 2024 is the applicable document.*

The St. Clair County Housing Authority (SCCHA) reviewed St. Clair County’s Consolidated Plan (CP) for 2020 – 2024 to assess the housing needs of the families in its jurisdiction, which includes all of St. Clair County. The information provided below comes directly from the CP.

HUD defines low-income households using three income levels:

- Extremely Low Income (households with incomes at or below 30% of Area Median Income;
- Very Low Income (households with incomes greater than 30% but equal to or less than 50% of area median income), and;
- Low Income (households with incomes greater than 50% but equal to or less than 80% of area median income).

The following findings were contained in the CP.

- Housing cost burden was more severe as household income decreased (i.e. extremely low income households experienced more of a cost burden than did very low or low income households).
- Renter households are more cost burdened than homeowner households.

According to the CP, there are 45,685 low-income households in St. Clair County (out of a total of 106,260 households) with the following income range distribution:

Extremely Low	Very Low	Low
18,834 (18%)	13,393 (13%)	19,134 (18%)

The CP makes the following observations regarding St. Clair County.

- There are sharp contrasts in the economic status of St. Clair County residents. Communities in the American Bottoms have widespread poverty with accompanying blight and abandonment, while those of the bluffs have extensive residential and commercial development. *Note: The CP does not formally define the area referred to as the “American Bottoms” but it is commonly known in the locale as the area west of Illinois State Route 157 continuing to the Illinois State line at the Mississippi River. The area includes the City of East St. Louis and the surrounding collar communities, including both incorporated and unincorporated areas.*
- The American Bottoms communities have become economically distressed over the past 50 years as more affluent residents moved from the bottoms to the bluffs and to nearby Missouri communities.
- The African American population is mostly concentrated in the American Bottoms (in and around the City of East St. Louis and the collar communities). This is one of the largest minority concentrations in the State of Illinois. The bottom communities suffer from disinvestment, few economic opportunities, a disproportionate number of poor residents and a housing stock that has increasingly become housing of last resort.
- The disinvestment has also resulted in a lack of resources in affected school districts and a decline in positive perceptions of the affected communities.
- Cost burden, defined as housing cost greater than either 30% or 50% of income, is the most prevalent housing problem in St. Clair County, for both renter and owner households.
- Households of all types (small related, large related, elderly, other) experience housing cost burden. According to the 2013-2018 American Community Survey (DP04), an estimated 41.8% of renter households and 14.8% of owner households face housing cost burden.
- Affordability is major issue for single person households. Approximately 47% of single person households, or an estimated 14,795 single person households, are in need of some sort of housing assistance.
- Virtually all extremely low-income households (less than 30% AMI), or 19,410 (of 19,415) households, are housing cost burdened or severely housing cost burdened (according to the 2012-2016 CHAS selected data summary for St. Clair County).
- Extremely low-income households generally face two key challenges. The challenge of finding quality affordable housing and the challenge of finding appropriate supportive services.
- Although extremely low-income households are generally not homeless, they do require many of the same supportive services IGD coordinates through the Housing Resource Center, the Homeless Action Council, and the St. Clair County Continuum of Care (LIHEAP – utility assistance; rental, deposit, and mortgage assistance; prescription assistance, meal assistance, other specialized care assistance).
- Homelessness is a serious issue impacting all household types, including those receiving or in need of mental health services.

A racial or ethnic group is defined as having a disproportionately greater need if the percentage of persons in a category of need who are members of the particular racial or ethnic group is at least ten percentage points higher than the percentage of persons in the category of need as a whole. The analysis in the CP identified disproportionate housing need among minority groups as follows:

- Hispanic Households at 0% - 30% of AMI.
- American Indian / Alaska Native Households at 0% - 30% of AMI
- Asian Households at 30% - 50% of AMI.
- Black / African American at 30% - 50% AMI
- Asian Households at 50% - 80% AMI
- Hispanic Households at 50% - 80% AMI
- Asian Households at 80% - 100% AMI
- Hispanic Households at 80% - 100%

All together, these groups represent approximately 7,319 households and approximately 2,951 households with housing problems. In some cases, the number of households in a racial or ethnic group is small, resulting in potentially misleading data. For example, there are only 78 Asian households at 30% - 50% of AMI, 64 of which experience housing problems. This results in a high percentage (72%) of households experiencing housing problems, but the overall numeric need is actually quite small.

In further discussion, the CP notes that two groups experience housing cost burden and/or severe housing cost burden at a disproportionately greater rate:

- Black / African American households
- American Indian / Alaska Native households
- Hispanic households

It is important to note the population of St. Clair County is almost one third (1/3) Black / African American. Therefore, while multiple racial and ethnic groups have disproportionately greater needs on a percentage basis, there is a particularly high number of Black / African American households experiencing housing cost burden at disproportionately greater rates.

The CP notes that local service providers estimate that there are approximately 1,100 to 1,500 homeless individuals in St. Clair County. The majority of tracked homeless persons and households are African American. However, there are likely additional unidentified and untracked homeless person and households, especially in rural areas of St Clair County.

The CP 2020 - 2024 does not specifically address the housing issues facing persons with disabilities. However, the CP 2015 - 2019 estimated 35,669 St. Clair County residents, or 13.6% of civilian, non-institutionalized persons, have a disability. Of these 35,669 residents, approximately 9.3% are youth under the age of 18, 53.9% are adults ages 18-65 and 36.8% are seniors 65 years of age or older. Special needs persons generally face two key challenges – finding quality affordable housing and appropriate supportive services (the same key challenges



faced by low-income households). There is no reason to believe the housing issues of those with disabilities significantly changed or improved from the CP 2015 – 2019.

The CP states while the full extent of the at-risk population is unknown, St. Clair County’s Homeless Management Information System (HMIS) helps track data on person who are either homeless or at imminent risk of becoming homeless. Households at risk of becoming homeless include (but are not limited to) households staying with a family or friend temporarily or households currently housed but without a source of income.

The updated CP did not address the supply of housing available at various household income levels. The prior CP (2015 – 2019) determined there was insufficient housing for renter households at less than 30% of AMI income level. The specifics cited in the older document are retained herein. There were 3,954 housing units affordable to renters making less than 30% of AMI, but there were 10,410 renter households at that income level. The CP concluded Renter households at this income level are incredibly difficult to house. It further determined that while there are “technically” enough affordable units available for renter households at the 30%-50% and 50% - 80% AMI levels, the data available demonstrates that affordable rental housing is not uniformly available in all communities, and there may be a lack of affordable rental housing in areas of high opportunity (with access to jobs, services, high quality schools, etc.).

**B. Housing Needs of Families on the Public Housing and Section 8 Tenant – Based Waiting Lists**

The **Section 8 Housing Choice Voucher Program (HCVP) waiting list** as of 1/2/24 included the following demographic breakdown.

	Number of Families	Percent of Families
Total Wait List	5,447	100%
Extremely Low Income	4,755	87%
Very Low Income	511	9%
Low Income	149	3%
Singles	2,120	39%
Couples	1,395	26%
Families	1,932	35%
Elderly Families (62+)	662	12%
Families’ w/ disability	886	16%
White households	924	17%
Black households	4,281	79%
Other – race / ethnicity *	794	0%
Hispanic households	72	1%
Non-Hispanic households	2,286	97%

\*Or none declared.

The Section 8 HCVP wait list remains open with an estimated eleven percent (11%) annual turnover rate (based upon the number of program participants who leave the program compared to the number of tenants under contract at the beginning of the year --- January 2024).

The wait list for the **Public Housing** program is site based, with eighteen different locations. The consolidated wait list, with duplicated count (meaning that an applicant is counted for each waiting list for which they applied), results in the following demographic breakdown (report dated 1/2/2024). *Note: In prior years the information presented was in an “unduplicated count” format. SCCHA’s current housing software does not provide for this option, but the percentages cited below were determined generally consistent with past calculations and are considered reflective of an unduplicated count wait list.*

	Number of Families	Percent of Families
Total Wait List	20,395	100%
Extremely Low Income	17,928	88%
Very Low Income	1,958	10%
Low Income	462	3%
Singles	10,013	49%
Couples	5,443	27%
Families	4,939	24%
Elderly Families (62+)	2,559	13%
Families’ w/ disability	4,580	22%
White households	3,226	16%
Black households	16,355	80%
Other – race / ethnicity *	814	4%
Hispanic households	229	1%
Non-Hispanic households	19,948	98%
Non-declared	217	1%
*Or none declared		
0 & 1 Bedroom	10,566	52%
2 Bedroom	7,004	34%
3 Bedroom	2,449	12%
4 Bedroom	370	2%
5+ Bedroom	6	< 1%

All public housing waiting lists remain open and the annual turnover is estimated at fifteen percent (15%) based upon the number of move-outs annually compared to the number of occupied units at the beginning of the calendar year 2024.

The wait list demographics suggest that the needs of the applicants on both the public housing and Section 8 HCVP wait lists are consistent with the needs of households in the jurisdiction as identified in St. Clair County’s Consolidated Plan (CP). Approximately eighty-eight percent (88%) of all applicants for housing assistance fall in the extremely low-income category (30% or below of area median income). Housing cost burden is the primary factor in applicants seeking housing assistance. Twenty-two percent (22%) of all applicant households report having a disability. Eighty percent (80%) of applicant households are black. Black households were identified in the CP as one of the minority groups having a disproportionate housing need. The number of Hispanic and other minority households on the wait lists is consistent with general population statistics cited in the County’s CP 2020-2024.

SCCHA reviewed available data sets contained in the CP and found nothing to indicate that the housing needs of the jurisdiction and needs of the applicants (Section 8 and Public Housing) differ in any significant way.

*Reference Note: The St. Clair County Consolidated Plan 2020 to 2024 served as the basis of identifying the housing needs of households in the jurisdiction. A copy of the Consolidated Plan is on file and available for review upon request in conjunction with the review and comment period for the St. Clair County Housing Authority’s 2024 Agency Plan Update.*

## **Statement of Strategy for Addressing Housing Needs**

### **(1) Strategies**

#### **Need: Shortage of affordable housing for all eligible populations**

#### **Strategy 1. Maximize the number of affordable units available to the PHA within its current resources by:**

- Employ effective maintenance and management policies to minimize the number of public housing units off-line;
- Reduce turnover time for vacated public housing units;
- Minimize “offline” time due to renovation / modernization of public housing units;
- Maintain or increase HCVP lease-up rates by establishing payment standards that will enable families to rent throughout the jurisdiction;
- Undertake measures to ensure access to affordable housing among families assisted by the PHA, regardless of unit size required;
- Maintain or increase section 8 lease-up rates by marketing the program to owners, particularly those outside of areas of minority and poverty concentration;
- Maintain or increase section 8 lease-up rates by effectively screening Section 8 applicants to increase owner acceptance of program.

- Participate in the Consolidated Plan development process to ensure coordination with broader community strategies.

**Strategy 2: Increase the number of affordable housing units by:**

- Support the efforts of others to increase the number of affordable housing units.
- Utilize available Project Based Voucher authority to increase the number of affordable units targeting hard-to-house and/or special needs households.

**Need: Specific Family Types: Families at or below 30% of median**

**Strategy 1: Target available assistance to families at or below 30 % of AMI by:**

- Exceed HUD federal targeting requirements for families at or below 30% of AMI in public housing.
- Exceed HUD federal targeting requirements for families at or below 30% of AMI in tenant-based section 8 assistance.
- Adopt rent policies to support and encourage work.

**Need: Specific Family Types: Families at or below 50% of median**

**Strategy 1: Target available assistance to families at or below 50% of AMI by:**

- Employ admissions preferences aimed at families who are working;
- Adopt rent policies to support and encourage work.

**Need: Specific Family Types: The Elderly**

**Strategy 1: Target available assistance to the elderly:**

- Maintain HUD-approved designation of public housing for the elderly;
- Maintain Senior Service Coordination Program;
- Utilize available Project Based Voucher authority to increase the number of affordable units designated for the elderly, especially those with special needs.

**Need: Specific Family Types: Families with Disabilities**

**Strategy 1: Target available assistance to Families with Disabilities:**

- Maintain HUD-approved designation of public housing for families with disabilities;
- Carry out the modifications needed in public housing based on the section 504 Needs Assessment for Public Housing;
- Affirmatively market to local non-profit agencies that assist families with disabilities (primarily LINC, Inc.);
- Utilize available Project Based Voucher authority to increase the number of affordable units designated for persons with disabilities.

**Need: Specific Family Types: Races or ethnicities with disproportionate housing needs**

**Strategy 1: Increase awareness of PHA resources among families of races and ethnicities with disproportionate needs:**

- No specific marketing / outreach activities are planned at this time.

**Strategy 2: Conduct activities to affirmatively further fair housing**

- Counsel Section 8 tenants as to location of units outside of areas of poverty or minority concentration and assist them to locate those units.
- Market the Section 8 program to owners outside of areas of poverty /minority concentrations.
- Administer all programs in non-discriminatory manner.
- Arrange for Fair Housing / Reasonable Accommodation training for staff on periodic basis.

**Other Housing Needs & Strategies: (list needs and strategies below)**

**Need: Upgrade the quality of the public housing stock**

**Strategy 1: Identify public housing properties that may not have long-term viability and prepare and submit demolition applications to HUD along with Replacement Tenant Protection Vouchers.**

- The public housing developments considered most questionable in terms of long-term viability are:
  1. The entire #30-08 portion of the Ernest Smith Sr. Apartments (ESSA) in Cahokia Heights (formerly Centreville) [AMP 3] have been demolished.
  2. It is hoped the 30-06 portion of the ESSA (AMP 3) will be determined viable in the long-term with needed physical improvements achieved through a “re-positioning” option available through HUD.

3. Similarly, it is hoped the public housing units in Brooklyn, the Thomas Terry Apartments (TTA) comprising AMP 1 can achieve long-term viability. The Village is also extremely poverty and minority concentrated. The poverty rate is 36.7% and the population is 95.1% African American. Additionally, there are very few services / retail shopping options available in the community. These factors combine to make it a tough decision whether or not to try and retain the federally assisted housing presence in this community.

4. The public housing units in Washington Park, thirty-two (32) scattered site units with twenty (20) one-bedroom units designed for non-elderly disabled persons and twelve (12) two-bedroom units with general (or family) occupancy designation, pose another dilemma. Again, the community is highly concentrated in terms of poverty (54.1% of the population) and minority population (90% African American). Source: US Census 2020]. Additionally, the community is plagued by crime, dilapidated streets, vandalized or burned-out housing structures and an array of other adverse conditions. The public housing units represent some of the best housing stock, even though renovations and updates are needed. The scattered site characteristic of the public housing units is not a positive factor in the case of Washington Park. Many of the units are in isolated locations on streets where there is no other occupied unit in the block or even adjacent blocks. It is a fair question whether SCCHA should work to retain the public housing units in this community. The property maintains high occupancy rates because of the desperate need for housing in St. Clair County. Most households who select Washington Park have no other viable / affordable housing option. As shown in the Asset Management Table, SCCHA is now and plans to continue to make capital improvements in these units in an attempt to keep them viable and available to families with limited housing options.

## **(2) Reasons for Selecting Strategies**

The following factors influenced the SCCHA's selection of the strategies it will pursue:

- Funding constraints;
- Staffing constraints;
- Limited availability of sites for assisted housing;
- Extent to which particular housing needs are met by other organizations in the community;
- Evidence of housing needs as demonstrated in the Consolidated Plan and other information available to the PHA;
- Influence of the housing market on PHA programs;
- Community priorities regarding housing assistance;
- Results of consultation with local or state government;
- Results of consultation with residents and the Resident Advisory Board;
- Results of consultation with advocacy groups;
- HUD's encouragement to "re-position" the national public housing stock;

**Attachment #B.1B – Deconcentration Policy Statement and Analysis**

## ***INCOME DE-CONCENTRATION POLICY STATEMENT***

It is St. Clair County Housing Authority's policy to provide for de-concentration of poverty and encourage income mixing by bringing higher income families into lower income developments and lower income families into higher income developments. Toward this end, we will skip families on the waiting list to reach other families with a lower or higher income. We will accomplish this in a uniform and non-discriminating manner.

The St. Clair County Housing Authority will affirmatively market our housing to all eligible income groups. Lower income residents will not be steered toward lower income developments and higher income people will not be steered toward higher income developments.

Prior to the beginning of each fiscal year, we will analyze the income levels of families residing in each of our developments and compare them to the Housing Authority wide average household income. Developments that fall outside the allowable 85%-115% range will be identified as low or high income concentrated. Based on this analysis, we will determine the waiting list actions, marketing strategies, and de-concentration incentives to implement. The worksheet for the analysis is attached.

### ***DECONCENTRATION INCENTIVES***

The St. Clair County Housing Authority may offer one or more incentives to encourage applicant families whose income classification would help to meet the de-concentration goals of a particular development.

Various incentives may be used at different times, or under different conditions, but will always be provided in a consistent and nondiscriminatory manner.



**ST. CLAIR COUNTY HOUSING AUTHORITY  
INCOME CONCENTRATION ANALYSIS  
AGENCY PLAN UPDATE - 2024**

Development	AMP	Average Income	Weighted Average	Adjusted Avg. Income	85% Threshold	115% Threshold	Within Range
PHA-WIDE		\$21,327	1.02	\$21,723	\$18,464	\$24,981	
Thomas Terry Apts.	001	\$21,868	1.09	\$23,848			Y
Private Mathison Manor	002	\$22,825.33	1.10	\$25,033			N

Weighted Average Adjustment For Bedroom Size Distribution

	Occupied Units	Efficiency Units (.70)	1-bedroom Units (0.85)	2-bedroom Units (1.00)	3-bedroom Units (1.25)	4-bedroom Units (1.40)	5-bedroom Units (1.61)	Check Unit Count
PHA-WIDE	789	2	305	269	167	42	4	789
Thomas Terry Apts.	138	0	27	56	42	9	4	138
Private Mathison Manor	183	0	16	92	66	9	0	183
PHA-Wide	$(2 \times .70) + (305 \times .85) + (269 \times 1) + (167 \times 1.25) + (42 \times 1.40) + (4 \times 1.61) / 789$							
	1.02	1.02						
Thomas Terry Apts.	$0 \times .70 + 27 \times .85 + 56 \times 1 + 42 \times 1.11 + 9 \times 1.40 + 4 \times 1.61 / 138$							
	1.09	1.09						
Private Mathison Manor	$0 \times .70 + 16 \times .85 + 92 \times 1 + 66 \times 1.25 + 9 \times 1.40 + 0 \times 1.61 / 183$							
	1.10	1.10						

Report calculated using data as of 1/16/2024

**INCOME DECONCENTRATION WORKSHEET - APU 2024**  
(Occupancy Data as of 01/16/2024)

Development Number / Name	Number of Units Under ACC	Number of Occupied Units	# of Units Occupied by Extremely Low-Income Families	% of Units Occupied by Extremely Low-Income Families	Census Tract	Percent of Poverty in Census Tract (2020 Census)
30-1	100	89	66	74%	5045.00	47.7%
30-9	42	37	20	54%		
30-12 Brooklyn	16	12	7	58%		
30-19	8	8	7	88%	5040.02	11.1%
30-28 Lenzberg	8	8	7	88%		
30-2	18	18	13	72%		
30-7 Marissa	14	14	13	93%		
30-3 Dupo	19	19	13	68%	5031.00	15.0%
30-5 Smithton	10	10	7	70%	5039.06	5.1%
30-6	51	47	35	74%	5027.00	43.3%
30-20 Cahokia Heights	8	8	8	100%		
30-10	110	93	63	68%	5028.00	42.4%
30-60	85	74	55	74%		
30-80 Cahokia Heights	16	16	12	75%		
30-11 Cahokia Heights	44	43	23	53%	5025.00	45.2%
30-13	16	16	14	88%	5040.01	4.6%
30-21 New Athens	16	16	11	69%		
30-14 Lebanon	24	23	14	61%	5043.02	12.3%
30-16	38	38	29	76%	5016.05	2.9%
30-27 Belleville	64	64	52	81%		
30-17 Washington Park	32	32	27	84%	5022.00	47.7%
30-18 Swansea	16	16	11	69%	5033.01	14.9%
30-22 Millstadt	18	18	12	67%	5032.03	4.6%
30-24 O'Fallon	20	20	11	55%	5043.51	12.4%
30-61 Belleville	48	48	36	75%	5019.00	10.7%

\* Denotes Development with less than 40% of Extremely Low Income Households.

**Attachment #B.1C - Statement of Financial Resources**

## Summary of Financial Resources Budgeted for FYE 06/30/2024

Public Housing Operating Fund Subsidy		\$3,733,645
Public Housing Capital Fund 2023 CFP Grant		\$3,427,375
Public Housing Dwelling Rental		\$2,079,000
Interest Income		\$12,600
Other Income-Maintenance Chrgs, Legal Fees, Laundry		\$104,500
Annual Contributions for Section 8	HAP	\$14,904,000
	Admin Fee	\$1,671,796
		\$25,932,916

## Summary of Financial Resources Actually Received for FYE 06/30/2023

Public Housing Operating Fund Subsidy		\$3,772,467
Public Housing Capital Fund---		
	2019	\$271,573
	2020	\$1,047,031
	2021	\$2,071,748
	2022	\$949,767
		<b>\$4,340,119</b>
Public Housing Dwelling Rental		\$2,177,446
Interest Income		\$13,071
Other Income-Maintenance Chrgs, Legal Fees, Laundry, Misc		\$123,446
Annual Contributions for Section 8	HAP	\$14,639,090
	Admin Fee	\$1,777,825

\*As of 01/09/2024

**Attachment #B.1D – Approved Changes in Operation and Management Policies**

- 2024 Public Housing Utility Allowance Schedule (B.1D1)
- 2024 Housing Choice Voucher Program Utility Allowance Schedule (B.1D2)
- 2024 Housing Choice Voucher Program Payment Standard (B.1D3)
- 2024 PH Flat Rent Schedule (Based upon 2024 SAFMRs) [B.1D4]
- Anticipated Revisions to the HCVP Administrative Plan (B.1D5)
- Anticipated Revisions to the Public Housing Admissions and Continued Occupancy Policy [ACOP] (B.1D6)

**Attachment #B.1D1 – 2024 Public Housing Utility Allowance Schedule**

St. Clair County Housing Authority  
Public Housing Utility Allowance Schedule  
Effective Date: May 1, 2024

Development		Bedroom Size					
		0	1	2	3	4	5
30-1	Brooklyn		82	94	106	116	126
30-2	Marissa			94	106	116	
30-2C <sup>1</sup>	Marissa			169			
30-3	Dupo	78	78	93	107	117	
30-5	Smithton		82		106	114	
30-6	Centreville		81	92	104	111	
30-60	Centreville		83	95	107	117	
30-7	Marissa		85				
30-8	Centreville		84	96	108		129
30-80	Centreville			96	108		
30-9 Gas Heat	Brooklyn		128	157	186		
30-9A Electric Heat <sup>2</sup>	Brooklyn			193			
30-10	Centreville		85	95	109	118	
30-11	Alorton		113	132	157	175	
30-12	Brooklyn		133	160	190		
30-13	New Athens		145	178			
30-14	Lebanon		134	171	211		
30-16 (North 47th)	Belleville Bel-Plaza 2		68				
30-61 (S. Church)	Belleville Bel-Plaza 1		68				
30-17	Washington Park		131	158			
30-17A S/F House <sup>3</sup>	Washington Park			172			
30-18	Swansea		156				
30-19	Lenzburg		116	136			
30-20	Centreville		89				
30-21	New Athens		143				
30-22	Millstadt		148	194	246		
30-24A <sup>4</sup>	O'Fallon			116			
30-24B	O'Fallon			190			
30-27	Belleville- Amber Ct		90	107			
30-28	Lenzburg			94	130		

Effective Date: 05/01/2024

Resident Comment Period: 01/01/2024-02/29/2024

Board Approval Date: 03/13/2024

<sup>1</sup>Units = ULL, A12, A31, A32, A41, A42, B21, B22

<sup>2</sup>Units = 604,606, 608 610, 616, 618, 620, 622, 628, 630, 632, 634 South 5<sup>th</sup> St.

<sup>3</sup>Units = 1800, 1826, 2236 and 2240

<sup>4</sup>Buildings = 301 and 303 Estate

**Attachment #B.1D2 – 2024 HCVP Utility Allowance Schedule**



# Utility Allowance Schedule

See Public Reporting and Instructions on back.

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing

OMB Approval No. 2577-0169  
(exp. 04/30/2026)

The following allowances are used to determine the total cost of tenant-furnished utilities and appliances.

Locality/PHA		Unit Type: Apartment (3 or More Units)						Date (mm/dd/yyyy)	
St Clair County Housing Authority, IL								2/1/2024	
Utility of Service	Fuel Type	0 BR	1 BR	2 BR	3 BR	4 BR	5 BR	6 BR	
Heating	Natural Gas	\$18.00	\$22.00	\$25.00	\$28.00	\$32.00	\$35.00	\$38.00	
	Bottle Gas	\$42.00	\$50.00	\$60.00	\$65.00	\$73.00	\$83.00	\$88.00	
	Electric	\$19.00	\$23.00	\$30.00	\$38.00	\$45.00	\$53.00	\$57.00	
	Electric Heat Pump	\$17.00	\$20.00	\$24.00	\$27.00	\$29.00	\$32.00	\$35.00	
	Fuel Oil	\$68.00	\$80.00	\$91.00	\$103.00	\$114.00	\$125.00	\$137.00	
Cooking	Natural Gas	\$3.00	\$3.00	\$5.00	\$5.00	\$7.00	\$8.00	\$9.00	
	Bottle Gas	\$6.00	\$6.00	\$10.00	\$13.00	\$17.00	\$19.00	\$21.00	
	Electric	\$6.00	\$7.00	\$10.00	\$13.00	\$16.00	\$20.00	\$21.00	
Other Electric		\$22.00	\$27.00	\$37.00	\$47.00	\$58.00	\$68.00	\$73.00	
Air Conditioning		\$9.00	\$10.00	\$14.00	\$18.00	\$22.00	\$25.00	\$28.00	
Water Heating	Natural Gas	\$6.00	\$7.00	\$10.00	\$13.00	\$16.00	\$19.00	\$21.00	
	Bottle Gas	\$15.00	\$17.00	\$23.00	\$29.00	\$38.00	\$44.00	\$48.00	
	Electric	\$15.00	\$17.00	\$22.00	\$27.00	\$32.00	\$37.00	\$40.00	
	Fuel Oil	\$23.00	\$27.00	\$34.00	\$46.00	\$57.00	\$68.00	\$72.00	
Water		\$64.00	\$66.00	\$82.00	\$98.00	\$115.00	\$131.00	\$142.00	
Sewer		\$46.00	\$48.00	\$64.00	\$79.00	\$95.00	\$111.00	\$121.00	
Sewer Treatment		\$24.00	\$25.00	\$35.00	\$44.00	\$54.00	\$64.00	\$71.00	
Trash Collection	(avg)	\$21.00	\$21.00	\$21.00	\$21.00	\$21.00	\$21.00	\$21.00	
Other specify: Electric Charge \$10.26		\$10.00	\$10.00	\$10.00	\$10.00	\$10.00	\$10.00	\$10.00	
Other specify: Natural Gas Charge \$23.87		\$24.00	\$24.00	\$24.00	\$24.00	\$24.00	\$24.00	\$24.00	
Range /Microwave		\$11.00	\$11.00	\$11.00	\$11.00	\$11.00	\$11.00	\$11.00	
Refrigerator		\$12.00	\$12.00	\$12.00	\$12.00	\$12.00	\$12.00	\$12.00	
<b>Actual Family Allowances</b> - May be used by the family to compute allowance while searching for a unit.						Utility/Service/Appliance		Allowance	
Head of Household Name						Heating			
						Cooking			
Unit Address						Other Electric			
						Air Conditioning			
						Water Heating			
Number of Bedrooms						Water			
						Sewer			
						Trash Collection			
						Other			
						Range/Microwave			
						Refrigerator			
						Total			



# Utility Allowance Schedule

See Public Reporting and Instructions on back.

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing

OMB Approval No. 2577-0169  
(exp. 04/30/2026)

The following allowances are used to determine the total cost of tenant furnished utilities and appliances.

Locality/PHA <b>St Clair County Housing Authority, IL</b>		Unit Type: <b>Duplex, Townhouse or Row House</b>					Date (mm/dd/yyyy) 2/1/2024	
Utility of Service	Fuel Type	0 BR	1 BR	2 BR	3 BR	4 BR	5 BR	6 BR
Heating	Natural Gas	\$24.00	\$28.00	\$32.00	\$36.00	\$40.00	\$43.00	\$47.00
	Bottle Gas	\$54.00	\$65.00	\$73.00	\$84.00	\$92.00	\$100.00	\$109.00
	Electric	\$28.00	\$33.00	\$42.00	\$51.00	\$60.00	\$70.00	\$75.00
	Electric Heat Pump	\$20.00	\$24.00	\$29.00	\$32.00	\$36.00	\$39.00	\$42.00
	Fuel Oil	\$87.00	\$103.00	\$114.00	\$129.00	\$144.00	\$160.00	\$171.00
Cooking	Natural Gas	\$3.00	\$3.00	\$5.00	\$5.00	\$7.00	\$8.00	\$9.00
	Bottle Gas	\$6.00	\$6.00	\$10.00	\$13.00	\$17.00	\$19.00	\$21.00
	Electric	\$6.00	\$7.00	\$10.00	\$13.00	\$16.00	\$20.00	\$21.00
Other Electric		\$28.00	\$34.00	\$46.00	\$60.00	\$73.00	\$86.00	\$93.00
Air Conditioning		\$8.00	\$10.00	\$17.00	\$24.00	\$31.00	\$38.00	\$41.00
Water Heating	Natural Gas	\$7.00	\$9.00	\$13.00	\$16.00	\$20.00	\$24.00	\$26.00
	Bottle Gas	\$17.00	\$21.00	\$29.00	\$38.00	\$46.00	\$56.00	\$61.00
	Electric	\$19.00	\$22.00	\$28.00	\$34.00	\$40.00	\$46.00	\$50.00
	Fuel Oil	\$27.00	\$30.00	\$46.00	\$61.00	\$72.00	\$87.00	\$95.00
Water		\$64.00	\$66.00	\$82.00	\$98.00	\$115.00	\$131.00	\$142.00
Sewer		\$46.00	\$48.00	\$64.00	\$79.00	\$95.00	\$111.00	\$121.00
Sewer Treatment		\$24.00	\$25.00	\$35.00	\$44.00	\$54.00	\$64.00	\$71.00
Trash Collection	(avg)	\$21.00	\$21.00	\$21.00	\$21.00	\$21.00	\$21.00	\$21.00
Other specify: Electric Charge \$10.26		\$10.00	\$10.00	\$10.00	\$10.00	\$10.00	\$10.00	\$10.00
Other specify: Natural Gas Charge \$23.87		\$24.00	\$24.00	\$24.00	\$24.00	\$24.00	\$24.00	\$24.00
Range /Microwave		\$11.00	\$11.00	\$11.00	\$11.00	\$11.00	\$11.00	\$11.00
Refrigerator		\$12.00	\$12.00	\$12.00	\$12.00	\$12.00	\$12.00	\$12.00
<b>Actual Family Allowances</b> - May be used by the family to compute allowance while searching for a unit.						Utility/Service/Appliance	Allowance	
Head of Household Name						Heating		
Unit Address						Cooking		
						Other Electric		
						Air Conditioning		
						Water Heating		
Number of Bedrooms						Water		
						Sewer		
						Trash Collection		
						Other		
						Range/Microwave		
						Refrigerator		
						Total		



adapted from form HUD-52667  
(04/2023)

The Nelrod Company 9/2023 Update Revised Work 11/13/23

# Utility Allowance Schedule

See Public Reporting and Instructions on back.

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing

OMB Approval No. 2577-0169  
(exp. 04/30/2026)

The following allowances are used to determine the total cost of tenant-furnished utilities and appliances.

Locality/PHA St Clair County Housing Authority, IL		Unit Type <b>Single-Family House/Detached</b>						Date (mm/dd/yyyy) 2/1/2024	
Utility of Service	Fuel Type	0 BR	1 BR	2 BR	3 BR	4 BR	5 BR	6 BR	
Heating	Natural Gas	\$26.00	\$31.00	\$36.00	\$41.00	\$45.00	\$50.00	\$53.00	
	Bottle Gas	\$61.00	\$71.00	\$84.00	\$94.00	\$106.00	\$115.00	\$123.00	
	Electric	\$44.00	\$52.00	\$60.00	\$68.00	\$77.00	\$85.00	\$92.00	
	Electric Heat Pump	\$24.00	\$28.00	\$34.00	\$38.00	\$42.00	\$46.00	\$50.00	
	Fuel Oil	\$95.00	\$110.00	\$129.00	\$144.00	\$163.00	\$179.00	\$194.00	
Cooking	Natural Gas	\$3.00	\$3.00	\$5.00	\$5.00	\$7.00	\$8.00	\$9.00	
	Bottle Gas	\$6.00	\$6.00	\$10.00	\$13.00	\$17.00	\$19.00	\$21.00	
	Electric	\$6.00	\$7.00	\$10.00	\$13.00	\$16.00	\$20.00	\$21.00	
Other Electric		\$33.00	\$39.00	\$54.00	\$69.00	\$85.00	\$100.00	\$108.00	
Air Conditioning		\$7.00	\$8.00	\$18.00	\$27.00	\$37.00	\$47.00	\$50.00	
Water Heating	Natural Gas	\$7.00	\$9.00	\$13.00	\$16.00	\$20.00	\$24.00	\$26.00	
	Bottle Gas	\$17.00	\$21.00	\$29.00	\$38.00	\$46.00	\$56.00	\$61.00	
	Electric	\$19.00	\$22.00	\$28.00	\$34.00	\$40.00	\$46.00	\$50.00	
	Fuel Oil	\$27.00	\$30.00	\$46.00	\$61.00	\$72.00	\$87.00	\$95.00	
Water		\$64.00	\$66.00	\$82.00	\$98.00	\$115.00	\$131.00	\$142.00	
Sewer		\$46.00	\$48.00	\$64.00	\$79.00	\$95.00	\$111.00	\$121.00	
Sewer Treatment		\$24.00	\$25.00	\$35.00	\$44.00	\$54.00	\$64.00	\$71.00	
Trash Collection	(avg)	\$21.00	\$21.00	\$21.00	\$21.00	\$21.00	\$21.00	\$21.00	
Other specify: Electric Charge \$10.26		\$10.00	\$10.00	\$10.00	\$10.00	\$10.00	\$10.00	\$10.00	
Other specify: Natural Gas Charge \$23.87		\$24.00	\$24.00	\$24.00	\$24.00	\$24.00	\$24.00	\$24.00	
Range /Microwave		\$11.00	\$11.00	\$11.00	\$11.00	\$11.00	\$11.00	\$11.00	
Refrigerator		\$12.00	\$12.00	\$12.00	\$12.00	\$12.00	\$12.00	\$12.00	
<b>Actual Family Allowances</b> - May be used by the family to compute allowance while searching for a unit						Utility/Service/Appliance		Allowance	
Head of Household Name						Heating			
						Cooking			
Unit Address						Other Electric			
						Air Conditioning			
						Water Heating			
Number of Bedrooms						Water			
						Sewer			
						Trash Collection			
						Other			
						Range / Microwave			
						Refrigerator			
						Total			



adapted from form HUD-52667  
(04/2023)

# Utility Allowance Schedule

See Public Reporting and Instructions on back.

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing

OMB Approval No. 2577-0169  
(exp. 04/30/2026)

The following allowances are used to determine the total cost of tenant-furnished utilities and appliances.

Locality/PHA St Clair County Housing Authority, IL		Unit Type <b>Mobile Home</b>					Date (mm/dd/yyyy) 2/1/2024	
Utility of Service	Fuel Type	0 BR	1 BR	2 BR	3 BR	4 BR	5 BR	6 BR
Heating	Natural Gas	\$23.00	\$26.00	\$31.00	\$34.00	\$38.00		
	Bottle Gas	\$52.00	\$61.00	\$71.00	\$79.00	\$88.00		
	Electric	\$46.00	\$55.00	\$56.00	\$58.00	\$60.00		
	Electric Heat Pump	\$20.00	\$24.00	\$29.00	\$32.00	\$36.00		
	Fuel Oil	\$80.00	\$95.00	\$110.00	\$125.00	\$137.00		
Cooking	Natural Gas	\$3.00	\$3.00	\$5.00	\$5.00	\$7.00		
	Bottle Gas	\$6.00	\$6.00	\$10.00	\$13.00	\$17.00		
	Electric	\$6.00	\$7.00	\$10.00	\$13.00	\$16.00		
Other Electric		\$33.00	\$39.00	\$54.00	\$69.00	\$85.00		
Air Conditioning		\$8.00	\$9.00	\$16.00	\$23.00	\$30.00		
Water Heating	Natural Gas	\$7.00	\$9.00	\$13.00	\$16.00	\$20.00		
	Bottle Gas	\$17.00	\$21.00	\$29.00	\$38.00	\$46.00		
	Electric	\$19.00	\$22.00	\$28.00	\$34.00	\$40.00		
	Fuel Oil	\$27.00	\$30.00	\$46.00	\$61.00	\$72.00		
Water		\$64.00	\$66.00	\$82.00	\$98.00	\$115.00		
Sewer		\$46.00	\$48.00	\$64.00	\$79.00	\$95.00		
Sewer Treatment		\$24.00	\$25.00	\$35.00	\$44.00	\$54.00		
Trash Collection	(avg)	\$21.00	\$21.00	\$21.00	\$21.00	\$21.00		
Other specify: Electric Charge \$10.26		\$10.00	\$10.00	\$10.00	\$10.00	\$10.00		
Other specify: Natural Gas Charge \$23.87		\$24.00	\$24.00	\$24.00	\$24.00	\$24.00		
Range Microwave		\$11.00	\$11.00	\$11.00	\$11.00	\$11.00		
Refrigerator		\$12.00	\$12.00	\$12.00	\$12.00	\$12.00		
<b>Actual Family Allowances</b> - May be used by the family to compute allowance while searching for a unit						Utility/Service/Appliance		Allowance
Head of Household Name						Heating		
						Cooking		
						Other Electric		
						Air Conditioning		
Unit Address						Water Heating		
						Water		
						Sewer		
						Trash Collection		
						Other		
Number of Bedrooms						Range / Microwave		
						Refrigerator		
						Total		



**Attachment #B.1.D3 – 2024 Housing Choice Voucher Program Payment Standard**

To: Board of Commissioners

Fr: Larry McLean, Executive Director  
Pam Jackson, Program Director *dy*

Re: Payment Standards for the Housing Choice Voucher Program (HCVP)

Dt: December 27, 2023

**We are recommending the HCVP Payment Standard Schedule (PSS) be increased to 100% of the 2024 Fair Market Rents as shown below.**

The following amounts for all zip codes in St. Clair County except for 62208 (Fairview Heights) and 62269 (O'Fallon).

<u>0 B/R</u>	<u>1 B/R</u>	<u>2 B/R</u>	<u>3 B/R</u>	<u>4 B/R</u>	<u>5 B/R</u>
\$928 (+\$106)	\$972 (+\$21)	\$1,209 (+\$111)	\$1,565 (+\$142)	\$1,818 (+\$155)	\$2,091 (+\$179)

The following amounts for zip codes 62208 (Fairview Heights) and 62269 (O'Fallon).

<u>0 B/R</u>	<u>1 B/R</u>	<u>2 B/R</u>	<u>3 B/R</u>	<u>4 B/R</u>	<u>5 B/R</u>
\$1,080 (+\$123)	\$1,130 (+\$118)	\$1,410 (+\$134)	\$1,830 (+\$180)	\$2,120 (+\$184)	\$2,438 (+\$212)

*Note: All of the above amounts are based upon the landlord furnishing all utilities and the stove and refrigerator.*

Some explanation and background is warranted. HUD publishes the annual Fair Market Rents (FMRs) for the Housing Choice Voucher Program (HCVP) annually (usually in October).

Federal regulation provides a Housing Authority the discretion to establish the Payment Standard Schedule (PSS) at any level between 90% and 110% of the published FMRs.

The interim 2023 PSS update took the payment standards to 110% of the published 2023 FMRs effective August 9<sup>th</sup> for moves and new admissions and October 1, 2023 for annual recertifications.

We did not immediately recommend a change in the PSS based upon the release of the 2024 FMRs because we wanted to allow time to assess the impact the most recent increase had on "affordability" as gauged by proposed new Request for Tenancy Approvals (or RFTAs or new "Landlord Packets / Leases") received.

While we do not have statistical data to support the finding, anecdotal indicators suggest "affordability" remains a challenge for voucher holder lease up, especially when it comes to higher-quality rental units in more desirable locations.

Additionally, as you are aware, SCCHA remains well below the HUD targeted budget utilization rate of 98%.

Therefore, we are now recommending adoption of a PSS equivalent to (100% of) the published 2024 FMRs, which is significantly higher than the PSS currently in effect (as illustrated above).

**Our goal for the last several years has been to achieve increased HAP expenditures by increasing the number of assisted families.** However, despite a great deal of effort and a significant investment of time and other resources, the desired result has not been achieved (the number of units / tenants under contract has remained about the same overall, with relatively minor monthly fluctuations). We are hopeful that the higher PSS will facilitate increased lease-up ---we know that average HAP (housing assistance payment) will increase significantly. The goal is that both of these factors will combine to achieve budget utilization rates that meet or exceed the HUD target of 98%.

**Your approval of the increased payment standard schedules effective January 10, 2024 for moves and new admissions and March 1, 2024 for annuals is respectfully recommended.**

We also want to share with you that HUD notified SCCHA (along with a number of other housing authorities) of the mandatory use of Small Area Fair Market Rents (by zip code) in establishing HCVP Payment Standards no later than January 1, 2025 (see attached letter). We are in the process of analyzing the data and determining the most appropriate implementation methodology. It is possible we will make a follow-up recommendation to implement a 2024 interim PSS based upon the SAFMRs, but that is undetermined at this time.

We are pleased to respond to any questions and/or provide any additional information you may need related to this recommendation. Thank you.

**Attachment #B.1D4 – 2024 Public Housing Flat Rent Schedule (Based upon 2024 SAFMRs)**



**St. Clair County Housing Authority**

**Public Housing**

**Proposed Flat Rent Schedule - 2024 (Using Small Area FMRs)**

**Effective Date: May 1, 2024**

	0-BR	1-Br	2-Br	3-Br	4-Br	5-Br
Alorton - (Hawthorne - 011)		\$ 431	\$ 556	\$ 731	\$ 873	
Belleville (Amber Court - 027)		\$ 470	\$ 597			
Belleville (Bel-Plaza 1 - Church - 061)		\$ 524				
Belleville (Bel-Plaza 2 - N. 47th - 016)		\$ 492				
Brooklyn - Thomas Terry - 001		\$ 462	\$ 594	\$ 782	\$ 932	\$ 1,079
Brooklyn - TT - 009 (Gas Heat)		\$ 416	\$ 531	\$ 702		
Brooklyn - TT - 009 (Elec Heat)			\$ 495			
Brooklyn - TT - 012		\$ 411	\$ 528	\$ 698		
Cahokia Heights - ESS (006)		\$ 463	\$ 596	\$ 784	\$ 937	
Cahokia Heights - ESS (008)		\$ 460	\$ 592	\$ 780		\$ 1,076
Cahokia Heights - ESS (020)		\$ 455				
Cahokia Heights - PMM (010)		\$ 459	\$ 593	\$ 779	\$ 930	
Cahokia Heights - PMM (060)		\$ 461	\$ 593	\$ 781	\$ 931	
Cahokia Heights - PMM (080)			\$ 592	\$ 780		
Dupo	\$ 482	\$ 522	\$ 659	\$ 869	\$ 1,019	
Lebanon (Garden Ridge - 014)		\$ 506	\$ 629	\$ 829		
Lenzburg (019)		\$ 428	\$ 552			
Lenzburg (028)			\$ 594	\$ 758		
Marissa (002)			\$ 594	\$ 782	\$ 932	
Marissa (002 - C)			\$ 519			
Marissa (007)		\$ 459				
Millstadt		\$ 436	\$ 542	\$ 706		
New Athens (Phillips - 013)		\$ 431	\$ 542			
New Athens (South Clinton - 021)		\$ 433				
O'Fallon (024-A)			\$ 812			
O'Fallon (024-B)			\$ 738			
Smithton (005)		\$ 510		\$ 854	\$ 1,014	
Swansea (Fullerton Rd - 018)		\$ 404				
Washington Park - 017 Scattered		\$ 421	\$ 538			
Washington Park - 017 Scattered			\$ 524			

Effective Date: May 1, 2024

Resident Comment Period: 1/1/24 thru 2/29/24

Board Approval Date: April 10, 2024

**Attachment #B.1D5 – Anticipated Revisions to the HCVP Administrative Plan**

## Anticipated Policy Changes

### Notice of Upcoming Changes to the Public Housing ACOP and Housing Choice Voucher Program (HCVP) Administrative Plan as a Result of HOTMA Implementation

#### A. HUD Published HOTMA Final Rule in the *Federal Register*

The Department of Housing and Urban Development (HUD) officially published the final rule in the *Federal Register* on February 14, 2023 implementing Sections 102, 103, and 104 of the Housing Opportunity Through Modernization Act of 2016 (HOTMA). These sections make extensive changes to the United States Housing Act of 1937, particularly those affecting income calculation and reviews. Below are some highlights:

##### Section 102

- It applies mainly to public housing, HCV, and PBRA, but some of its provisions also apply to HOME, HTF, and HOPWA.
- It extensively modifies the definition of annual income.
- It makes changes to how income from financial aid and scholarships is determined.
- It creates a 10 percent adjusted income increase/decrease threshold for conducting interim reexaminations. In most cases, it requires that increases in earned income are not processed until the next annual reexamination.
- It allows for the use of annual income determinations from other programs.
- It increases standard deductions for families with a head, cohead, or spouse who is elderly or a person with a disability.
- It codifies additional income and asset exclusions, including amounts received from Medicaid or other state/local programs meant to keep a family member with a disability living at home.
- It increases the allowance for unreimbursed health and medical care expenses from three percent of annual income to 10 percent, phased in over two years.
- It raises the imputed asset threshold from \$5,000 to \$50,000, incentivizing families to build wealth without imputing income on those assets.
- It provides hardship relief for expense deductions, lessening the impact of the increased threshold for medical expenses.

##### Section 103

- It imposes continued program participation limits for families exceeding the statutory income limitation in the public housing program, also known as the “over-income” provision.
- In doing so, it modifies the definition of Total Tenant Payment (TTP) and changes requirements regarding preferences, family choice of rents, reexaminations, automatic lease renewals, and terminations.

#### Section 104

- It applies to public housing, HCV, PBRA, HOME, HTF, and HOPWA.
- It imposes a \$100,000 asset limit for eligibility and continued assistance. Families are also ineligible for assistance if they own real property suitable for occupancy. PHAs have the option of delaying enforcement/termination for up to six months if the family is over the asset threshold at the time of annual reexamination.
- It implements deductions and exceptions for certain investments. Retirement accounts and educational savings accounts will not be considered a net family asset.
- It allows self-certification of net assets if estimated to be at or below \$50,000.
- It requires that applicants for and recipients of assistance provide authorization to PHAs to obtain financial records.
- It changes the requirements for the signing of consent forms by family members.
- It removes the requirement to run the EIV Income Report at a family’s interim recertification.

HOTMA impacts rental assistance programs administered by HUD’s Offices of Public and Indian Housing (PIH), Multifamily Housing (MFH), and Community Development and Planning (CPD), including the Housing Choice Voucher (HCV), Public Housing, Section 8 Project-Based Rental Assistance (PBRA), Section 202/811, HOPWA, HOME, and the Housing Trust Fund programs.

Changes related to Section 103 (over-income provision) will become effective on **March 16, 2023** (30 days after publication in the *Federal Register*). PHAs have an additional 120 days after the effective date to fully implement the changes. Reference item #1 above for information as to how SCCHA will revise its Public Housing ACOP to comply with Section 103.

Changes related to Sections 102 and 104 will be effective **January 1, 2025**. HUD will be providing additional implementation guidance and training for these sections over the coming months. Therefore, SCCHA will wait to make specific changes to its PH ACOP and HCVP Administrative Plan until HUD implementation guidance has been issued and training

has been provided. Since the final rule makes the public aware of upcoming changes, SCCCHA's subsequent revisions to its PH ACOP and HCVP AP will not be considered a significant amendment to its Agency Plan and shall take effect upon approval by the Board of Commissioners..

For further information, refer to the [final rule](#) and the [HOTMA Resources](#) webpage.

#### **B. Compliance with Public Housing Access Bill (SB1980)**

Criminal history should not be considered in the case of the following:

1. Unless required by federal law
2. Arrest or charges did not lead to conviction.
3. Conviction has been vacated, expunged, sealed, etc.
4. Juvenile Court matters
5. Amount of time released from jail. (Rights are immediate)
6. Convictions are older than 180 days from submission of application.

Authority shall create a system for independent review of criminal history.

1. Reviewer should review criminal history and ONLY report history that does not interfere with the guidelines above to the decision maker.
2. Reviewer should not participate in final decision of application.

Authority can deny an applicant in the following cases:

1. Denied under federal law
2. Criminal conviction (of the past 180 days) jeopardizes safety, health and peaceful enjoyment of fellow tenants. "The mere existence of a criminal history record does not demonstrate such a risk."

Authority may file suit for repossession of the premises after 3 days written notice and w/o a hearing, if the tenant creates or maintains a threat that constitutes a clear and serious danger to fellow tenants and Authority Employees. This includes, but is not limited to any of the following actions by the tenant or guest of tenant on premises:

1. Physical assault or threat of physical assault
2. Gang membership
3. Illegal use or threat of illegal use of weapon
4. Illegal possession or use of drugs or allowing guests the illegal possession or use of drugs on premises.

Tenant shall be given the opportunity to contest the termination in the court proceedings.

Gang membership is defined in "Illinois Streetgang Terrorism Omnibus Prevention Act" as:

1. Any person who in fact belongs to a gang;
2. Acts as an accessory to a gang;
3. Has a course or pattern of gang related activity whether in preparatory, executory, or cover-up phase;
4. Knowingly performs, aids, or abets such activity.

SCCHA shall revise its PH ACOP and HCVP AP to incorporate the above provisions of State law. Since the public is aware of these upcoming changes, SCCHA's subsequent revision to its policies shall not be considered a significant amendment to its Agency Plan and shall take effect upon approval by the Board of Commissioners.

### **C. HUD FHEO Program Compliance Review**

SCCHA is in discussions with the Fair Housing & Equal Opportunity Division of HUD related to a Program Compliance Review of SCCHA's waiting lists and leasing operations. The review opened in early 2023. The parties are actively working on a Conciliatory Agreement that will, among other things, necessitate changes to SCCHA's Public Housing ACOP and the HCVP Administrative Plan. The corresponding policy revisions resulting from the agreed upon changes must be reviewed and approved by FHEO prior to adoption.

**Attachment #B.1D6 – Anticipated Revisions to the Public Housing ACOP  
(Admissions and Continued Occupancy Policy)**

**See Attachment #B-1D5**



**Attachment #B.1E – Asset Management Table**

**Asset Management**  
[24 CFR Part 903.7 9 (q)]

The St. Clair County Housing Authority (SCCHA) is engaging in activities that will contribute to the long-term asset management of its public housing stock, including how the SCCHA is planning for long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs. Those activities (that have **not** been addressed elsewhere in the PHA Plan document) include **Development-based Accounting and Comprehensive Stock Assessment**.

Reference is made to the Public Housing Asset Management Table that follows.

**Public Housing Asset Management Table - 2024**

Development Identification		Activity Description									
Name, Number, and Location	Number and Type of units	Capital Fund Program Parts II and III Component 7a	Development Activities Component 7b	Demolition / Disposition Component 8	Designated housing Component 9	Conversion Component 10	Home-ownership Component 11a	Other (describe) Component 171			
#1 – Brooklyn	100	\$0	RAD Conversion Assessment	Potential Demo / Disposition	None Planned	Potential	None Planned	DBA/CSA			
#2 – Marissa	18	\$1,000,000	RAD Conversion Assessment	None Planned	None Planned	None Planned	None Planned	DBA/CSA			
#3 – Dupo	20	\$0	RAD Conversion Assessment	None Planned	None Planned	None Planned	None Planned	DBA/CSA			
#5 – Smithton	10	\$0	RAD Conversion Assessment	None Planned	None Planned	None Planned	None Planned	DBA/CSA			
#6 & 60 – Cahokia Heights	178	\$5,220,984	RAD Conversion Assessment	Potential Demo / Disposition	None Planned	None Planned	None Planned	DBA/CSA			
#7 – Marissa	14	\$0	RAD Conversion Assessment	None Planned	None Planned	None Planned	None Planned	DBA/CSA			
#8 (80) – Cahokia Heights	16	\$0	None Considered Feasible	HUD approved Demolition-2024	None Planned	None Planned	None Planned	DBA/CSA			
#9 – Brooklyn	42	\$50,000	RAD Conversion Assessment	Potential Demo / Disposition	None Planned	None Planned	None Planned	DBA/CSA			
#10 – Cahokia Heights	110	\$3,902,184	RAD Conversion Assessment	Potential Demo / Disposition	None Planned	None Planned	None Planned	DBA/CSA			
#11 – Cahokia Heights	44	\$100,000	RAD Conversion Application	None Planned	None Planned	Conversion Planned	None Planned	DBA/CSA			
#12 – Brooklyn	16	\$0	RAD Conversion Assessment	Potential Demo / Disposition	None Planned	None Planned	None Planned	DBA/CSA			
#13 – New Athens	16	\$0	RAD Conversion Assessment	None Planned	4-1br disabled only	None Planned	None Planned	DBA/CSA			
#14 – Lebanon	24	\$0	RAD Conversion Assessment	None Planned	4-1br disabled only	Conversion Planned	None Planned	DBA/CSA			
#16 & #61 – Belleville	86	\$1,780,855	RAD Conversion	None Planned	86 units senior only	None Planned	None Planned	DBA/CSA			

<sup>1</sup> Development-based Accounting and Comprehensive Stock Assessment

#17 - Washington Park	32	\$230,000	Assessment RAD Conversion Assessment	Potential Demo / Disposition None Planned	20-1br disabled only	None Planned	None Planned	DBA/CSA
#18 - Swansea	16	\$0	RAD Conversion Assessment	None Planned	16 units senior only	None Planned	None Planned	DBA/CSA
#19 - Lenzburg	8	\$100,855	RAD Conversion Assessment	None Planned	4-1br disabled only	None Planned	None Planned	DBA/CSA
#20 - Cahokia Heights	8	\$0	RAD Conversion Assessment	Potential Demo / Disposition None Planned	None Planned	None Planned	None Planned	DBA/CSA
#21 - New Athens	16	\$212,200	RAD Conversion Assessment	None Planned	16 units senior only	None Planned	None Planned	DBA/CSA
#22 - Millstadt	18	\$241,855	RAD Conversion Assessment	None Planned	None Planned	None Planned	None Planned	DBA/CSA
#24 - O'Fallon	20	\$0	RAD Conversion In Process	None Planned	None Planned	Conversion Planned	None Planned	DBA/CSA
#27 - Belleville	64	\$947,447	RAD Conversion Assessment	None Planned	64 units senior only	None Planned	None Planned	DBA/CSA
#28 - Lenzburg	8	\$100,855	RAD Conversion Assessment	None Planned	None Planned	None Planned	None Planned	DBA/CSA

**Attachment #B.2A – Statement Regarding Use of Project-Based Vouchers Mixed Finance,  
Modernization or Development, Demolition and/or Disposition, and  
Conversion of Public Housing**

## Attachment #B.2A

### Part 1 - Statement Regarding Use of Project-Based Vouchers

The SCCHA established its discretionary authority to operate a project-based voucher (PBV) component of its Section 8 Housing Choice Voucher Program in 2006, exercising this option under the October 13, 2005 final rule. An updated Final Rule regarding PBV was issued June 25, 2014. Further, significant changes were made to the Project Based Voucher Program when the Housing Opportunity Through Modernization Act of 2016 (also known as HOTMA) was passed by Congress and implementation guidance was issued by HUD in PIH Notice 2017-21. The option to set-aside up to 20% of HCVP Consolidated Annual Contributions Contract (ACC) authorized units will permit the SCCHA to develop and maintain long-term safe, decent, and affordable housing that is accessible to its HCV applicants and program participants as determined necessary and appropriate. SCCHA has not set a specific goal for its unit authority it will dedicate to its PBA program; however, in any given calendar year, the SCCHA reserves the right to utilize up to 20% of its unit authority for its PBA program.

In 2014 SCCHA entered into a Housing Assistance Payments Contract (HAPC) for eight (8) Project Based Vouchers to support the Jazz @ Walter Circle senior housing development in the City of East St. Louis. HUD approval for the use of eight (8) project-based vouchers for this purpose was granted before the October 1, 2013 merger of the Section 8 Housing Choice Voucher Programs of the Housing Authority of East St. Louis and the St. Clair County Housing Authority.

SCCHA issued a Request for Proposals (RFP) for potential PBV projects in January 2015 establishing the possibility of issuing PBV HAPC for up to fifty (50) units. SCCHA reserved the right under the RFP to approve up to fifty (50) PBV units under the language in the RFP. SCCHA did not make an award of PBV units under the January 2015 RFP.

In July 2015 SCCHA issued another RFP for potential PBV projects establishing the possibility of issuing PBV HAPC for up to fifty (50) units. In April 2016 SCCHA entered into a HAPC for twenty-nine (29) PBV to support the Cottages at Cathedral Square senior housing development in the City of Belleville. The HAPC received HUD approval.

SCCHA issued another RFP for potential PBV projects in July 2016 and in September 2016 the Board of Commissioners conditionally awarded PBVs to two separate senior developments. Thirty (30) PBV units were awarded to the Lincoln Park Villas in O'Fallon and sixteen (16) PBV units were awarded to the Metro Landing @ Swansea development. The Lincoln Park Villas is now under HAPC. The Metro Landing development remains under A-HAP at this time, but is anticipated to proceed to HAPC in early 2019.

SCCHA also issued an RFP for potential PBV projects in July 2019 receiving five (5) proposals. The SCCHA Board of Commissioners approved award of PBVs to the following developments:

- 12 PBVs for the Lofts on the Square in Belleville
- 24 PBVs for the Tax Credit Family Development in Centreville
- 32 PBVs for the Tax Credit Elderly Development in Centreville
- 10 PBVs for the Winstanley Park Development in East St. Louis, and

**Part 2 - Statement Regarding Mixed Finance Modernization or Development, Demolition and / or Disposition, and Conversion of Public Housing**

SCCHA submitted to and received approval from HUD's Special Application Center an application for demolition of the Adeline James Building (AJB), a thirty-two (32) unit senior building in Centreville (part of the public housing development known as IL030-006) and five (5) family buildings in the Ernest Smith Sr. Apartments (ESSA), containing twenty (20) units, located on South 46<sup>th</sup> Street in Centreville (that are part of the public housing development #IL030-008 or #30-08). SCCHA also applied for and received fifty-two (52) Replacement Tenant Protection Vouchers (TPVs) to facilitate the relocation of the households displaced by the demolition action.

SCCHA submitted a second demolition application (in January 2022) targeting the one-hundred-two (102) family units in the ESSA development that are part of project #30-08. The application was approved, and the relocation of residents is now complete. SCCHA was eligible to apply for 59 TPVs and did, but because of limited funding was only awarded thirty-three (33) TPVs in 2022. SCCHA was eligible to apply for an additional twenty-six (26) TPVs in 2023 but did not do so because of long-term under-utilization in its traditional HCVP. SCCHA also submitted (in January 2022) an application for conversion of forty-four public housing units to project-based vouchers and/or project-based rental assistance. The application targeted the twenty (20) units in O'Fallon (#30-24) and twenty-four (24) units in Lebanon (#30-14). These units are part of AMP 5. A CHAP (Commitment to Enter into a Housing Assistance Payments Contract) has been executed and SCCHA has been and continues to work toward closing. It was hoped the closing would be completed in 2023 but various delays resulted in this goal not being obtained. SCCHA is now hoping to submit the Financing Plan in early 2024 and reach "conversion closing" later in 2024.

Additionally, as encouraged by Dominique Blom, General Deputy Assistant Secretary for Public and Indian Housing, reference letter dated 11/13/2018; SCCHA is in the preliminary planning phase of determining the need for and assessing the feasibility / desirability of converting parts of or even all of its public housing portfolio to the Rental Assistance Demonstration Program (RAD) or other asset re-positioning program (such as mixed-finance, low-income housing tax credits, etc.). SCCHA and its "Housing Development Partner" will utilize the results of the comprehensive physical needs assessment, the "Green Physical Needs Assessment (GPNA), and other tools and pertinent information available in making the assessments for potential conversion and/or re-positioning activity. SCCHA and its HDP are also engaged with IHDA (Illinois Housing Development Authority) to develop a Community Revitalization Strategy for Cahokia Heights (which is comprised of the communities formerly known as Cahokia, Centreville and Alorton).

In this regard, during the next plan period SCCHA will carefully assess the following.

- The long-term viability of the remaining portions of the ESSA development in Centreville (30-06 and 30-20). SCCHA hopes to develop a re-positioning plan that provides for the continued operation of these federally-assisted rental units. However, the area where these units are located is impacted by storm and sanitary sewer systems that are not functioning properly and result in frequent back-ups in the units. SCCHA hopes to work with the other stakeholders, which include but are not limited to the City of Cahokia Heights, Cahokia Heights Water and Sewer Department, St. Clair County, as well as State and Federal partners to develop a plan for the repair / upgrade of the storm and sanitary sewer system so that it is possible to keep these units viable in the future.
- The long-term viability of the Thomas Terry Apartments in Brooklyn, a public housing property that consists of a total of one-hundred-fifty-six (156) units comprised of three separate developments (100 family units known as 30-01, 44 family units known as 30-09, and 16 family units known as 30-12). The Village of Brooklyn has very high concentrations of poverty and minorities. There are almost no businesses or services available in the Village. Adult entertainment facilities represent the Village's most common commercial business concerns. This development will be extremely difficult to "re-position" using private equity and/or low-income housing tax credits because of the location factors mentioned. SCCHA must give serious and careful consideration to the possibility that demolition of these public housing units is the most logical and practical decision. SCCHA and its HDP are in the early stages of engaging with IHDA regarding the development of a Community Revitalization Strategy for Brooklyn (as of January 2024).
- The long-term viability of the thirty-two unit scattered site development located in the Village of Washington Park. This community is highly concentrated in terms of poverty and minority population. Washington Park is plagued by a high crime rate. Most of the city streets are in serious states of disrepair. There are many vacant, vandalized and burned-out structures through-out the community. SCCHA has to question if it is "fair and just" to continue to offer federally-assisted housing in this devastated community.
- SCCHA expects to submit a RAD conversion application during the upcoming plan period to convert the Hawthorne Terrace apartments (44 units) in Cahokia Heights (area formerly known as Alorton) from public housing to the Project-based Vouchers federal funding platform. RAD conversion applications are also possible for other public housing units. At this time, the most likely candidates for a RAD conversion are one or more of the properties known as AMP 2 (Centreville and Alorton), AMP 4 (Belleville / Swansea) and AMP 6 (Marissa, Lenzburg, New Athens, Smithton, Millstadt, and Dupo).



**Attachment #B.2B – Capital Fund Emergency Safety and Security Grants**

## **Attachment #B.2B – Capital Fund Emergency Safety and Security Grants**

SCCHA was successful in applying for and receiving emergency safety and security grants in prior years. Several consecutive years through 2018 SCCHA applied for these grants and was determined eligible based upon the extent of crime in the targeted developments but was not selected to receive the grant through the HUD random selection process. SCCHA applied to HUD in 2019 targeting the Belleville senior properties. The application was determined not to meet the “emergency” threshold because of the lack of recent criminal data in the immediate vicinity of the developments. However, SCCHA subsequently received notification the 2018 application was selected for funding because of the lack of eligible applicants in 2019 and 2020. The 2018 application included upgraded security cameras within the two Bel-Plaza senior buildings (#30-16/61) and perimeter fencing at the Bel-Plaza 2 site. Those surveillance system and other security enhancements have been completed (during calendar year 2022).

It is undetermined if SCCHA will apply for CFP emergency safety and security grants in future funding rounds. These grants are highly competitive with low odds of success. The main factor in deciding whether or not to apply in the future is the availability of criminal data from local law enforcement to support the application (i.e. to demonstrate the incidence of crime in and around the immediate vicinity of the development is sufficient to meet the emergency criteria established in the NOFA).

**Attachment #B.3A - Statement of Progress in Meeting Mission and Goals  
(5 Year Plan)**

## FIVE-YEAR PLAN STATUS REPORT – FEBRUARY 2024 – YEAR 4 OF 5

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**Goal:** Expand the supply of assisted housing by reducing public housing vacancies, accelerating Housing Choice Voucher Program (HCVP) lease-up, leveraging private or other public funds and/or supporting and encouraging the efforts of other developers to create additional housing opportunities.

**Status:** There were seventy-four (74) public housing vacancies on 1/2/2020. As of 1/4/2021 there were technically one hundred eighteen (118) vacant public housing units. However, this number included fifty-two (52) units already approved by HUD for demolition along with twenty (20) additional vacant units that are shuttered pending a second application for demolition to HUD. The number of vacant public housing units available to be leased was forty-six (46) in January 2021. As of 2/1/2022 there were ninety-six (96) public housing vacancies, with thirty-eight (38) of that number being shuttered pending approval of the demolition application, leaving fifty-eight (58) public housing units vacant and available for lease. As of 2/1/2023 there were sixty-seven (67) public housing vacant units available for lease. HUD approval was obtained for the demolition of the one-hundred-six (106) units in the #30-08 portion of AMP 3 the Ernest Smith Senior Apartments (ESSA). Seventy-two (72) of the units were vacant with thirty (30) residents remaining in occupancy pending relocation. Units approved for demolition do not count as vacancies. HUD approved “market exceptions” for vacant units in AMP 2 (Cahokia Heights) and AMP 1 (Brooklyn), which excludes vacant units in these AMPs from counting in the vacancy rate calculation for two years. As of 2/1/24, there were fifty (50) public housing vacancies, with more than half (27) in AMP 2. With the market exception and approved demolition, the recognized occupancy rate exceeds ninety-seven percent (97%).

The number of Section 8 HCVP participants / units under contract as of 1/2/2020 was 2,337. The number under contract as of 1/4/2021 dropped by 4% to 2,236, despite SCCHA receiving ACC budget authority in calendar year 2020 for up to fifty-two additional vouchers resulting from the award of Replacement Tenant Protection Vouchers (TPVs) for the units lost to demolition. There were 2,289 participants under lease / contract as of February 1, 2022. Many factors influence the HCVP lease-up rate in any given year, but the primary challenge starting in 2020 and continuing throughout 2021 and much of 2022 was the Covid-19 pandemic and its negative impact on SCCHA operations and the community. The lingering adverse impact of the pandemic continued to negatively influence SCCHA operations in 2023 and is expected to continue well into 2024. The “pandemic” may be considered as over and behind the nation, but the unfavorable effects on organizational operations have continued. The number of participants under lease as of 1/1/2023 dropped to 2209, with another drop to 2,196 by 1/1/2024 despite aggressive lease-up efforts. Demand and costs in the local rental market literally exploded in 2022 and 2023 reducing the inventory of available rental units, especially high-quality units, to voucher holders, which is reflected in the overall “success” rate of voucher utilization falling to under 50%.

At the start of the 5 Year Agency Plan (July 1, 2020) SCCHA had a total of eighty-three (83) units under Project-Based Voucher (PBV) Housing Assistance Payments Contract (HAPC). The PBV units include:

- 8 units at the Jazz @ Walter Circle in East St. Louis;
- 29 units at the Cottages @ Cathedral Square in Belleville;
- 30 units at the Lincoln Park Villas in O'Fallon;
- 16 units at the Metro Landing @ Swansea.

All eighty-three PBV units are designated for senior citizens.

In November 2019, the SCCHA Board approved the award of PBVs for the following developments:

- 12 PBVs for the Lofts on the Square in Belleville (Senior)
- 24 PBVs for the Tax Credit Family Development in Centreville
- 32 PBVs for the Tax Credit Senior Development in Centreville
- 10 PBVs for the Winstanley Park Development in East St. Louis (Family), and
- 50 PBVs for the New Broadview Development in East St. Louis (Senior)

As of this writing, the New Broadview and Winstanley Park developments have progressed to A-HAPC stage (Agreement to Enter into a HAPC).

In December 2020, the SCCHA Board approved the award of PBVs for forty-eight (48) units at the East of Eden proposed senior development located in Lebanon. However, the proposed development did not receive the zoning variance needed for multi-family development at the property, so the proposal did not move forward.

In February of 2022, the SCCHA Board conditionally approved the award of PBVs to two proposed developments. Fourteen (14) PBVs (seven 1-bedroom and seven 2-bedroom) were awarded to the Avalon at O'Fallon development. Development plans target a total of fifty-six (56) family units. Fifteen (15) PBVs (nine 1-bedroom and six 2-bedroom) were awarded to the North Bend Residences development in Fairview Heights, which will include a total of sixty (60) units designated for senior citizens. The developers submitted applications to IHDA for tax credit and other funding. The Avalon project was not selected for funding and is considered dead. The North Bend Residences Development is actively pursuing approval of the required environmental review (ER) with hopes of moving toward submission of the subsidy layering review (SLR) and IHDA closing during the second quarter of 2024. Both of these (ER & SLR) need to be approved at the local and HUD (or IHDA) level for the proposed development to move to PBV A-HAPC stage. The developer requested and SCCHA awarded additional PBVs to the project, to bring the total number of PBVs awarded to the project to forty (40) one-bedroom units.

In November 2022, the SCCHA Board conditionally approved the award of PBVs to the following developments.

- 19 PBVs (10 two-bedroom, 3 three-bedroom, 6 four-bedroom single family homes) to support the development of the Avalon at Swansea, located at or near 3212 Smelting Works Road, Swansea.
- 13 PBVs (11 one-bedroom and 2 two-bedroom units) to support the development of the Power of Change Senior Housing of Cahokia Heights, located at or near 2338 Jerome Lane, Cahokia Heights. Note: Senior defined as 55 and older
- 16 PBVs (16 one-bedroom units) at Vivian’s Village (Phase 1) located at or near 5708 Bond Avenue, Cahokia Heights. Note: This is a Permanently Supportive Housing development designated for single or two-person households with supportive housing needs related to health status)
- 9 PBVs (4 one-bedroom, 3 two-bedroom and 2 three-bedroom family units) at Vivian’s Village, located at or near 5710 Bond Avenue, Cahokia Heights)

The developer of the Avalon project notified SCCHA they suspended plans for the proposed development. The Permanent Supportive Housing (PSH) proposal was submitted to IHDA in December 2022. The remaining two developments submitted their applications to IHDA in February 2023. As of this writing, the only proposals actively moving forward through the IHDA process are the two Vivian Village projects. The PSH project is moving toward closing (needing to obtain approval of the ER and SLR) and is expected to reach A-HAPC stage during the second quarter of 2024. The Vivian Village family proposal (from the 2019 PBV award) received tentative acceptance in early 2024 and has been invited to submit a full application / proposal by March. The project now includes thirty-six (36) family units and requested and received an increase in the number of PBVs from nine (9) to twelve (12).

SCCHA did not issue a proposal for PBVs in 2023.

SCCHA’s past PBV activity has increased the supply of affordable senior housing in high-demand areas of St. Clair County. The recent PBV awards have the potential to increase the supply of not only new senior housing but also the supply of new affordable family units as well as units specifically targeting persons with behavioral challenges.

**Goal:** Improve the quality of assisted housing through improved public housing and voucher management and renovating or modernizing the public housing stock using Capital Fund program and/or other “re-positioning” strategies available, such as the Rental Assistance Demonstration (RAD) Program.

**Status:** Full obligation and expenditure of Capital Fund allocations within obligation and expenditure dates achieved for all grants received. SCCHA did take advantage of the obligation extensions granted by HUD due to the Covid-19 Pandemic. The 2017 CFP

grant (which was closed out 12/31/2020) funded street and parking lot resurfacing in AMP 2 (Private Mathison Manor in Cahokia Heights) and AMP 3 (Ernest Smith Sr. Apartments in Centreville) along with roof replacement, exterior building and site improvements at the Gardenwood Apartments in Lebanon (part of AMP 5). The 2018 CFP grant (which was fully expended by May 31, 2021) funded ADA accessibility work at various properties; parking lot and deck coating at the Bel-Plaza 1 building in Belleville (IL30-61); HV/AC and water heater replacement, and exterior lighting upgrades for Amber Court in Belleville (IL30-27, part of AMP 4); roofing and insulation work in Cahokia Heights [CH] (IL30-6), Millstadt (IL30-22), New Athens (IL30-21) and Lenzburg (IL30-28). Door renovations and window replacement in #30-9 as well as security lighting upgrades in #30-1 & #30-9 in Brooklyn (AMP 1); kitchen and bath renovation and wall repairs in #30-12 (also in Brooklyn); demolition of the Adeline James Building along with the five family buildings and electrical panel upgrades in #30-06 in AMP 3 in CH; hv/ac and other mechanical upgrades in #30-10 in AMP 2 (CH) [partially funded this work]; Boiler and other mechanical upgrades at the public housing properties in Belleville (Bel-Plaza 1 & 2 in AMP 4); installation of a playground in #30-60 CH (AMP 2); and HVAC replacement [partial] in Washington Park (#30-17 in AMP 5), and New Athens (#30-13 in AMP 6) [along with water heater replacement] is all work funded in full or part by the 2019 CFP grant. The 2020 CFP grant funded the completion of a fully ADA accessible one-bedroom unit in Dupo (AMP 6), HV/AC replacement and mechanical room renovations in #30-10 (AMP 2 CH); HVAC replacement in #30-08 (AMP 2 CH); kitchen and bath renovations along with floor replacement in #30-20 (both in AMP 3 CH); bathroom renovations at #30-18 Swansea (AMP 4); kitchen, bathroom and flooring improvements at #30-13 and #30-21 New Athens (AMP 6). Modernization program year 2021 funded or will fund AC and security camera upgrades in #30-09 Brooklyn; HVAC replacement and mechanical room renovation in #30-10 Centreville (neighborhood of Cahokia Heights) [continued work]; AC replacement in #30-14 Lebanon and #30-24 in O'Fallon; kitchen and bathroom renovation, flooring wall repair in #30-21 New Athens [continuation]; HVAC replacement in #30-05 Smithton; security camera upgrades in #30-60, 80 10 in PMM, #30-06 and 20 in ESSA, and #30-16, 61 and 27 in Belleville.

Work planned under the 2022 CFP grant funded or is funding building demolition in IL30-08 in Cahokia Heights; upgrades to the security system in IL30-06 Cahokia Heights; retirement of the security system in IL30-08 Cahokia Heights; RAD Rehabilitation Improvements in IL30-14 Lebanon and IL30-24 O'Fallon; parking lot drainage and resurfacing in IL30-19 Lenzburg and IL30-28 Lenzburg; remove and replace parking lot (Behind Jefferson and Oak Street units) in IL30-22 Millstadt; Parking and site improvements in IL30-10 Cahokia Heights.

For modernization program year 2023, work items completed, in progress or planned include: pump station pond driveway in IL30-09 in Brooklyn; resurface streets and reseal and stripe parking lots in IL30-10 in Cahokia Heights; Security Surveillance in IL30-60,10 in Cahokia Heights; RAD Rehabilitation in IL30-11 in Cahokia Heights; resurface and reseal parking lots in IL30-06 in Cahokia Heights; heat tape and insulate drain lines in IL30-61 in Belleville; elevator renovation, heating system shut-offs, bathroom

renovations and heat pump replacement in IL30-16 in Belleville; Resurface streets and reseal and stripe parking lots, siding and door replacement in IL30-27 in Belleville; Kitchen and bathroom renovations, wall repair, flooring replacement, domestic waterline replacement, site drainage, window replacement and temporary resident relocation in IL30-22 in Millstadt; Kitchen and bathroom renovations in IL30-17 in Washington Park (20 one bedroom units).

The CFP 5 Year Plan is based upon the significant presumption 2023 funding levels are maintained for the full five-year period. Although increased substantially in FFYs 2019 thru 2023, CFP funds allocated annually by Congress / and awarded by HUD remain insufficient to meet the long-term physical needs of SCCHA's public housing inventory, jeopardizing the long-term viability of some of the properties. Continued, long-term underfunding of capital funds for the national public housing stock was referenced in the General Deputy Assistant Secretary for Public and Indian Housing, Dominique Blom's, 11/13/18 letter to all PHA Executive Directors encouraging them to consider "re-positioning" their public housing assets using the Rental Assistance Demonstration (RAD) Program.

HUD did not issue Public Housing Assessment System (PHAS) scores for FYE-2018 through 2021. HUD issued a partial PHAS score for SCCHA's FYE 6/30/2022. SCCHA received a score of sixty-nine (69), one point less than the score of seventy (70) needed to achieve "standard performer" designation. HUD adjusted SCCHA's base score by one (1) point to remove the positive influence the O'Fallon and Lebanon properties, which are in the process of converting from public housing to RAD-PBV, had on SCCHA's overall score. This deduction resulted in an "adjusted" score of 69 and SCCHA being classified as "physically troubled." The low REAC inspection scores from 2022 and the high number of public housing vacancies combined to fully account for the "substandard" designation. SCCHA expects its public housing program to return to "standard performer" status when (and if) a PHAS score is released for the FYE 6/30/2023.

The future management assessment methodology to be used by HUD for the public housing program is undetermined at this time. Whatever assessment system is introduced by HUD is expected to rely heavily on the physical condition of the public housing properties. The lack of adequate resources to maintain the physical structures (insufficient CFP grant monies and under-funded operating subsidies) negatively impacts REAC physical assessment scores, making achievement of High Performer status under any public housing assessment system difficult.

Section Eight Management Assessment Program (SEMAP) score for FYE-2019 was 96%, resulting in "High Performer" status. Due to the Covid-19 pandemic SEMAP reporting was suspended for FYE-2020 and 2021 with the 2019 scores "rolling over" for 2020 and 2021. A SEMAP certification was required for FYE-6/30/2022 even though for more than half of the fiscal year (at least through February 2022) the pandemic was at its peak. SCCHA argued that it was unjust and unfair for HUD to require a SEMAP certification covering the period from 7/1/2021 through 6/30/2022 given the severe adverse impact of the covid pandemic on operations throughout most of the period. HUD



required and SCCHA submitted the certification. SCCHA received a “standard performer” rating for FYE 6/30/2022. SCCHA’s HCVP returned to “high performer” designation with the FYE 6/30/2023 score.

Regarding “re-positioning” its public housing assets, SCCHA obtained HUD approval for the demolition of fifty-two units of public housing in AMP 3 CH (Ernest Smith Sr. Apartments ---32 units in #30-06 [Adeline James Senior Building] and 20 units in #30-08). SCCHA also received HUD approval of a second demolition application for the remaining one-hundred-two (106) public housing units in the #30-08 portion of AMP 3 (ESSA). The first phase of demolition was completed in 2022. All residents involved in the second phase of demolition were relocated in 2023 and the demolition of the buildings is expected to be complete during the first quarter of 2024. Further, SCCHA has submitted HUD an application to convert the O’Fallon (20 units) and Lebanon (24 units) public housing properties to Project-based Vouchers (PBVs) through the RAD process. The application was approved, and the conversion is currently under a CHAP (Commitment to enter into a Housing Assistance Payments Contract). It was SCCHA’s goal to submit a second conversion application targeting the Hawthorne Terrace public housing development in the Alorton neighborhood of Cahokia Heights (#30-11) initially during calendar year 2022. Submission in calendar year 2022 as hoped was not possible for reasons beyond SCCHA’s control. SCCHA held off submitting the RAD application for Hawthorne Terrace (HT) because of the long delay in completing its first conversion attempt (O’Fallon and Lebanon). Also, there does not appear to be as much emphasis on RAD-PBV conversion of public housing at the HUD national level as there was in the past. At this point SCCHA still plans to submit a conversion application for HT during 2024 but will probably delay initiating the underlying required work (primarily the Capital Needs Assessment and resident meetings) needed to apply until the pending conversion reaches closing or at least shows signs of substantial progress. SCCHA will also monitor whether or not HUD remains committed to RAD conversions as the primary public housing replacement / retention tool in the future and make decisions and take actions accordingly.

**Goal:** Increasing assisted housing choices by providing voucher mobility counseling, conducting outreach efforts to potential voucher landlords, maintaining voucher payments standards at highest possible level (up to 100% of the FMR) after determining total units under contract needed to earn requisite administrative fee for program viability and continued utilization of site-based wait lists for the public housing program.

**Status:** All voucher recipients receive voucher mobility counseling at time of voucher issuance and there is considerable portability activity among the Section 8 HCVP participants. The payment standard was increased to 100% of FMRs in April 2021 (up from 95%). Additionally, in recognition of the high market demand (and resulting higher rental rates), SCCHA adopted a two-tier payment standard. There is one (higher) payment standard for rental units in zip codes 62208 (Fairview Heights) and 62269 (O’Fallon), with a lower payment standard for the rest of the county which is based on the area wide FMRs. The FMRs increased again in October 2021. SCCHA increased the payment standard to the 100% level effective 4/13/2022. The FMRs increased again in

October 2022 and SCCHA promptly implemented increased payment standards (at the 100% level) effective 10/12/2022. SCCHA increased the payment standard again in 2023 and January 2024 maintaining 100% of FMR levels for both the county-wide schedule and the 62208 & 62269 schedule. SCCHA will continue to monitor lease-up success rates and other factors and anticipates keeping the payment standard schedules at 100% of the FMRs, although the payment standards were increased dramatically in 2023 and 2024 and when fully implemented average monthly HAP is expected to follow suit. It may become necessary from a financial perspective to reduce the payment standards in the future to something less than 100% of FMRs. Only time will tell. Outreach efforts to recruit potential new landlords with properties located outside of income / minority concentrated areas are on-going.

The public housing program continues to maintain site-based wait lists which provide applicants with increased housing choice.

**Goal:** Provide an improved living environment by implementing income de-concentration strategies, implementing public housing security improvements, designation of developments (or parts thereof) for particular resident groups (senior citizens, persons with disability), and aggressive applicant screening and resident lease enforcement efforts.

**Status:** The income concentration analysis completed at the start of the current Five-Year Agency Plan (7/1/2020) determined that none of our public housing properties were disproportionately impacted by income level. The analysis applies to the three public housing developments with more than one hundred (100) units ---Thomas Terry Apartments (TTA) in Brooklyn (AMP 1), Private Mathison Manor (PMM) in Cahokia Heights [CH] (AMP 2) and the Ernest Smith Sr. Apartments (ESSA) in CH (AMP 3). The analysis completed for the Agency Plan Update (APU) 2021 and 2022 also found no income concentration issues. All three developments had weighted average household incomes within the 85% to 115% threshold of the overall weighted average household incomes for all public housing households. The analysis completed for the 2023 APU also found no income concentrations at the three developments (AMPs) with a hundred (100) units or more. With the demolition, the unit count in the ESSA development fell to fifty-one (51) units and was therefore dropped from the analysis. The analysis for 2024 resulted in the TTA being within the 85% - 115% range, but with PMM falling outside the upper range of 115% by \$52, which is not considered statistically significant.

Security improvements, at least in a physical sense, have for the most part been restricted to limited expansion of the existing network of surveillance cameras that are operational at the properties in Brooklyn, Belleville, and Centreville. SCCHA submitted an emergency security grant application to HUD in 2019 targeting the Belleville senior properties. The application was determined not to meet the “emergency” threshold because of the lack of recent criminal data in the immediate vicinity of the developments. However, SCCHA received notification that the 2018 application was selected for funding because of the lack of eligible applicants in 2020 and 2019. The 2018 application

included upgraded security cameras within the two Bel-Plaza senior buildings (#30-16/61) and perimeter fencing at the Bel-Plaza 2 site. The surveillance system enhancements and new fence installation have been completed.

SCCHA staff works diligently to maintain a cooperative and collaborative relationship with the local police departments in the communities in which the public housing properties are located. In addition, coordination is maintained at the county, state, and federal law enforcement levels through the services of SCCHA's Law Enforcement Liaison Officer.

SCCHA successfully obtained a designated housing plan, which reserves certain properties for senior citizens (age 62 and over), non-seniors with a disability, and mixed-population properties. The residents and resident organization leaders, including the Resident Advisory Board, strongly attest to the success of the designated housing plan in maintaining a positive living environment for those impacted by the designated housing plan. The designated housing plan was renewed by HUD in 2020 and 2022 and the resident leaders strongly support SCCHA's plans to seek another two-year renewal of the plan when it expires in May 2024.

SCCHA staff continues to dedicate tremendous efforts toward successful applicant screening and aggressive lease enforcement. Federal and state eviction moratoriums began in March 2020 (because of the Covid-19 pandemic) and have been extended through October 2021. Additionally, the local FE&D court has been closed for the same period ---making lease enforcement impossible during this extended period. While the court has re-opened, it is still not operating at full capacity due to pandemic precautions, hampering timely and effective lease enforcement. Also, the protections afforded residents under VAWA (the Violence Against Women Act) make lease termination / eviction efforts more difficult and challenging even in the absence of an eviction moratorium.

**Goal:** Promote self-sufficiency and asset accumulation among families and individuals through the Family Self-Sufficiency Program, establishing linkages with support service providers to improve the employability of public housing residents and HCVP participants.

**Status:** When data was being compiled for the Five-Year Agency Plan starting 7/1/2020 there were six (6) public housing families and forty-four (44) HCVP participants enrolled in the FSS Program. As of the end of December 2020 there were thirty-eight (38) active participants. There were three new program enrollees, three pending contracts, and two FSS program participants who graduated from the FSS program. Both graduates significantly increased household earnings, obtained full-time employment, and completed credit counseling. One participant graduated college, and another became an entrepreneur. The graduates received \$38,823 combined in escrow pay-outs. Several contracts expired without the participants achieving the goals set forth. As of January 2022, program enrollment included eighteen (18) active participants. Seven participants

successfully completed the program with a combined escrow payout of \$62,519.46. Additionally, there were twelve (12) negative contract terminations and one (1) other participant who ported with an escrow transfer balance of \$1,587.96. As of January 2023, program enrollment included fourteen (14) active participants. Two (2) participants successfully completed the program in 2022 with a combined escrow payout of \$16,397.10. Additionally, there were six (6) negative contract terminations. SCCHA is advancing in its efforts to recruit viable candidates to meet the minimum of twenty-five (25) enrollees to qualify for a renewal grant to fund a full-time Program Coordinator. Although new enrollment has been difficult in previous years due to Covid-19 pandemic safety precautions and attrition / turnover in the FSS Coordinator position, SCCHA's expanded outreach effort was expected to result in participant enrollment that exceeded the minimum enrollment by Summer 2023. FSS enrollment as of February 2024 was at twenty-seven (27) participants.

SCCHA maintains Board membership on the Mid-America Work Force Investment Board and its Youth Council. In addition, SCCHA maintains strong ties with the Employment and Training staff of Local Service Delivery Area 24 (St. Clair County Intergovernmental Grants Department) and other organizations that provide education and training services. SCCHA staff members serve on the Homeless Action Council (an affiliate of the Community Action Agency), the Advisory Board for AgeSmart Community Resources (formerly known as the Southwestern Illinois Area Agency on Aging), and other community-based service organizations. The primary purpose of the association with these organizations is to stay aware of employment trends and opportunities, job training / education programs and services available and to leverage increased participation of public housing residents and HCVP participants in these programs.

**Goal:** Allow senior citizens and/or families with disabilities to retain independent housing situations as long as practical / reasonable through the Senior Service Coordinator Program.

**Status:** The Public Housing Senior Service Coordinator works to meet the needs of the elderly and families with disabilities to increase independence. Considerable anecdotal evidence is available to support the success of this program in increasing the independence of the senior and disabled populations served. The Service Coordination Program does an outstanding job and has received numerous awards, recognitions, and commendations.

**Goal:** Ensure equal housing opportunity for all persons and/or families seeking to live or living in assisted housing regardless of race, color, religion, national origin, sex, familial status, disability, sexual orientation and/or gender identification.

**Status:** SCCHA continues to operate and/or administer all programs and services in a non-discriminatory manner.

Traditional fair housing trainings, conferences and workshops were cancelled in 2020 due to the Covid-19 pandemic ---resulting in SCCHA staff not completing any fair housing training in 2020. Fair housing training has become available in virtual formats and SCCHA staff received training in 2021, 2022 and 2023. Plans are for the staff to complete additional fair housing training during the final months of the current plan year.

SCCHA sought to have staff trained on HUD's Affirmatively Furthering Fair Housing Plan Final Rule published July 16, 2015 to ensure compliance. However, the Trump Administration suspended the AFFHP final rule and issued a replacement rule. The Biden administration rescinded the Trump-era rule and re-adopted the AFFHP established by the 2015 final rule but withheld implementation. In January 2023 HUD issued a Notice of Proposed Rulemaking (NPRM) in the Federal Register for Affirmatively Furthering Fair Housing (AFFH). When the AFFH rule is finalized, SCCHA will take the necessary steps to comply, including securing adequate training for the staff.

**Goal:** Continue implementation of and update (as needed) SCCHA's Section 504 Transition Plan for public housing program and other operations.

**Status:** SCCHA continues to increase the physical accessibility of its properties, including exterior common areas, building / facility common areas, and individual unit accessibility, consistent with the 504 Transition Plan which was updated in 2013. SCCHA converted nine (9) units in its public housing inventory in 2020 to make them fully accessible by current ADA standards. SCCHA monitors (or self-assesses) to ensure the accessibility of its programs and operations from a "soft side" perspective. SCCHA intends to contract for a professional needs assessment of the operational and administrative aspects of its programs during the current five-year plan period. However, this goal was not achieved as of this writing.

**Goal:** Update or complete new physical needs assessment for all public housing properties and use the information to determine future of the public housing portfolio. Potential options include but are not limited to keeping properties or parts thereof as traditional public housing; demolition when warranted by physical condition, functional obsolescence, neighborhood, or other factors; and conversion to Project Based Rental Assistance (PBRA).

**Status:** A physical needs assessment specific to the Adeline James Building and the 30-08 portion of the Ernest Smith Sr. Apartments (ESSA) located on South 46<sup>th</sup> Street was completed. The report served as the basis for SCCHA's request and HUD's approval of demolition of these properties based upon functional obsolescence. Resident relocation and demolition are both complete. A physical needs assessment covering the remaining portion of the #30-08 units in AMP 3 (ESSA) has been completed and supported the demolition application submitted to HUD in January 2022. SCCHA obtained HUD approval in May 2022. SCCHA applied for 59 Tenant Protection Vouchers but was awarded only 33 in 2022 with instructions to re-apply for the remaining 26 potential TPVs in 2023. Resident relocation was completed in 2023. The second round of

relocation was much more difficult than anticipated based upon the results of the initial round of relocation. SCCHA did not apply for the 26 potential additional TPVs given the long-term and persistent under-utilization of budget authority experienced in the HCVF.

Through its HDP SCCHA has arranged for a Capital Needs Assessment and Energy Audit for the public housing properties in O’Fallon and Lebanon. The CNA and EA were needed prior to submission of a RAD conversion application to HUD for these properties. The application was initially submitted in January 2022. Since the document is now more than a year old and update was required before moving the conversion toward closing. The update was completed in 2023. SCCHA is hopeful conversion closing will occur before the end of the current plan period but given the slow nature of the process it will not be surprising if the closing does not happen unit the upcoming plan period.

SCCHA also worked in partnership with Southern Illinois Healthcare Foundation (SIHF) and the Illinois Housing Development Authority (IHDA) to complete a Community Revitalization Strategy for the City of Cahokia Heights. The final document did not specifically address the issue of the long-term viability of the public housing units located in Cahokia Heights (Private Mathison Manor and Ernest Smith Sr. Apartments) in the Centreville neighborhood. However, the document is beneficial to the City of Cahokia Heights and its future development efforts and was essential to obtaining IHDA funding for new housing developments in the city. SCCHA’s housing partners have secured a tentative commitment from IHDA to develop sixteen (16) units of permanently supportive housing units in Cahokia Heights and has been invited to submit a detailed proposal in 2024 for an additional thirty-six (36) family development in the city. Further details regarding these initiatives were discussed elsewhere in this document.

Physical / capital needs assessments for these and other public housing properties in SCCHA’s inventory will be completed in the future as funds, staffing and other needed resources become available and are required for specific initiatives, such as RAD conversion, demolition, etc.

**Goal:** As indicated by the results of the physical needs assessments (traditional and/or new “green” concept), work with our Housing Development Partner, St. Clair County Housing Development, LLC, to plan and implement replacement housing options for public housing developments or portions thereof determined functionally obsolete or otherwise not physically viable in the long-term.

**Status:** The status of this goal has already been addressed in the goals / status narratives provided above.

**Goal:** Complete the HUD-approved demolition of the Adeline James Building (32-unit senior building) and the #30-08 portion of the Ernest Smith Sr. Apartments (ESSA) located on South 46<sup>th</sup> Street (consisting of 5 buildings and 20 family units) also known as AMP 3 in Cahokia Heights.

**Status:** Demolition was completed in 2021.

**Goal:** Provide relocation assistance to residents impacted by approved demolition activity.

**Status:** The first round of relocation was successfully completed in 2020 (the residents of the AJB and the 20 units on South 46<sup>th</sup> St.). The second phase of relocation of residents from the remaining #30-08 portion of AMP 3 ESSA in Cahokia Heights was completed in 2023. The demolition involved a total of 106 units.

**Goal:** Apply for and receive Replacement Tenant Protection Vouchers (TPV's) for the fifty-two public housing units approved for demolition.

**Status:** SCCHA received an award of fifty-two (52) TPVs in calendar year 2020.

**Goal:** Pursue second phase of #30-08 demolition involving the remaining 106 family units in the ESSA, AMP 3 Centreville, including providing the required resident relocation assistance / benefits and applying for Relocation Tenant Protection Vouchers.

**Status:** Approval received, relocation is complete, and the buildings have been demolished.

**Goal:** Pursuant to above stated goals SCCHA anticipates submission of one or more RAD or demolition application(s) involving all or portions of the properties included in AMP 1 (Brooklyn), AMP 2 (Private Mathison Manor – Cahokia Heights), AMP 3 (the #30-06 and #30-20) in Cahokia Heights, AMP 4 (Belleville and Swansea senior building), AMP 5 (Washington Park, O'Fallon, and Lebanon), and AMP 6 (Marissa, Lenzburg, New Athens, Smithton, Millstadt, and Dupo) during the five-year plan period.

**Status:** Status of this goal discussed in previous narratives

**Attachment #B.3B - Statement of Progress in Meeting Annual Goals  
(2023 - 2024)**



## 2024 ANNUAL PLAN UPDATE STATUS REPORT ON CURRENT YEAR GOALS AS OF FEBRUARY 2024

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**Goal #1** - Maintain “Standard Performer” designation under Public Housing Assessment System (PHAS) or replacement assessment program introduced by HUD. Potential for lower rating is increasingly possible due to the number of public housing vacancies resulting from approved and planned demolition activities.

**Status:** *Results Pending.* SCCHA was designated as “physically troubled” by HUD for the fiscal year ending 6/30/2022 based upon REAC inspection scores and the number of public housing vacancies. SCCHA received an overall score of 69 (a minimum score of 70 is needed for standard performer designation). The score for FYE 6/30/2023 has not yet been released by HUD.

**Goal #2** - Reduce the number of vacancies in Private Mathison Manor (AMP 2) to 12 or less and in Thomas Terry Apartments (AMP 1) to 6 or less by end of plan period (6/30/2024).

**Status:** - *Not on track to achieve goal.* As of 2/1/24 there were 27 vacant units in AMP 2. The maintenance staff has not been able to “catch up” the backlog of vacant units due to a variety of factors (move-outs, condition of vacancies, staffing levels, etc.). It is not likely that this goal will be obtained by the 6/30/2024 target date. However, best efforts will continue to be made.

**Goal #3** – Return to “High Performer” designation under the Section 8 Management Assessment Program (SEMAP), or any replacement assessment program introduced by HUD, for the Housing Choice Voucher Program (HCVP).

**Status:** *Goal achieved.* SCCHA received “High Performer” status under SEMAP for its HCVP for the FYE-6/30/2023.

**Goal #4** - Achieve net gain of at least 100 HCVP participants under contract by end of calendar year 2023 and additional 50 by end of plan period (6/30/2024). Starting count of participants under contract is 2209.

**Status:** *Not on track to achieve goal.* Participants / units under HAP contract as of December 1, 2023 was 2197 a net loss of 12 from the starting point. The reasons for not achieving this goal are many, including factors beyond SCCHA’s control (unexplained program exits, program terminations due to material non-compliance with family obligations, tight rental market conditions [rapidly increasing rents, high demand, low inventory], drastically lower “success” rates for new voucher holders [compared to prior

years], etc., etc.). The HCVP Leasing Staff continues to work to put as many vouchers as possible “on the streets” but has been unable to achieve any net gain in the number of units / participants under contract in the first six months of the fiscal year. Best efforts will continue, but it is not likely that this goal will be achieved by the 6/30/24 end of plan year.

**Goal #5** - Continue to utilize Capital Fund Program (CFP) and any other funds available to upgrade / modernize the public housing stock consistent with the Five-Year CFP Plan, the most current physical needs assessment (PNA) and the “Green” PNA covering all AMPs. *Note: Until and unless any of public housing properties or converted under RAD or other “re-positioning” program or strategy.*

**Status:** *In progress.* SCCHA continues to fully utilize allocated CFP funds to improve the condition of the public housing inventory. Reference Five-Year Progress report for details regarding recent physical improvements made (or planned) using allocated CFP grant monies.

**Goal #6** - Through partnerships with local law enforcement and prevention program service providers and other initiatives, keep the incidence of criminal activity at all public housing developments at a level less than or equal to the surrounding neighborhoods.

**Status:** *In progress* A formal way of assessing this goal has not been established. However, SCCHA is confident crime in its public housing developments is comparable to or less than the neighborhoods in which the properties are located.

**Goal #7** - Comply with statutory and any HUD regulatory requirements to maintain site-based wait lists for public housing program.

**Status:** *Notable progress achieved.* SCCHA continues to administer its public housing site-based waiting list in a non-discriminatory manner. Third-party review and testing have not been arranged to date.

**Goal #8** - Arrange for Fair Housing and Reasonable Accommodation Training for all staff involved in wait list, admissions and/or continued occupancy activities for all federal housing programs administered.

**Status:** *Achievement pending.* Goal not achieved for plan year ending 6-30-2024 as of the date of this status report. Management typically arranges and staff completes this training during the January – June portion of the plan year. SCCHA plans to achieve this goal through virtual training offerings prior to the end of the current fiscal / plan year (6/30/2024).

**Goal #13** - Continue to assess potential for RAD conversion applications and/or demolition applications for all or portions of the properties included in AMP 1 (Brooklyn), AMP 2 (Private Mathison Manor – Centreville), AMP 3 (the #30-06 and #30-20 portion of the ESSA property in Centreville), AMP 4 (Belleville and Swansea senior buildings), AMP 5 (Washington Park) and/or AMP 6 (Marissa, Lenzburg, New Athens, Smithton, Millstadt and Dupo) consistent with comprehensive strategic plan completed in conjunction with IHDA and local stakeholders.

**Status** – *Limited progress*. Refer to status of goal #10, 11 and 12. The Community Revitalization Plan for Cahokia Heights did not provide the direction that was hoped for related to the long-term viability of the public housing properties in Cahokia Heights. SCCHA will have to rely on its Housing Development Partner and further physical needs assessments for direction in addressing this very difficult and complex problem. Additionally, preservation of existing public housing through increased capital fund appropriations appears to be the focus of the current presidential administration (with less focus on RAD conversions as the primary solution to an aging and deteriorating public housing stock).

**Goal #14** - Work with the Illinois Department of Children and Family Services (IDCFS) to successfully administer Family Unification Program (FUP) Vouchers by maintaining the targeted 95 FUP households under contract.

**Status** – *Not on track to achieve goal*. There were only 82 FUP households under contract as of February 1, 2024, despite receiving dozens of referrals and issuing numerous vouchers. This is a very hard to serve population with less overall success rates (in terms of voucher utilization) compared to traditional vouchers (which also has a declining success rate as noted in the status narrative for goal #4). SCCHA will continue to work with IDCFS and other partners to achieve this goal, but it is not likely to be achieved by the end of the current plan period.

**Goal #15** - Successfully administer a Family Self-Sufficiency Program serving both Housing Choice Voucher Program participants and public housing residents, while meeting or exceeding HUD’s established performance measures and maintaining minimum participation level required to qualify for a full-time FSS Program Coordinator.

**Status** – *Goal achieved*. As of 2/2/2024 there are 27 FSS participants under contract (two more than the HUD minimum of 25 to qualify for a full-time coordinator).

**Goal #16** - Within budgetary and regulatory constraints, continue utilization of Project Based-Voucher Program to address the housing needs of special needs or at-risk populations (such as the elderly and/or persons with disabilities) and/or increase affordable housing options in non-impacted or opportunity communities (as defined by the Illinois Housing Development Authority).

**Status** – *Progress continues.* SCCHA has entered into two PBV-AHAPs (Agreement to Enter into a Housing Assistance Payments Contract) so far during the plan period. One for 50 PBV units for The New Broadview and 10 for Winstanley Park. SCCHA anticipates reaching A-HAP stage on two additional developments by the end of the current plan period ---40 PBVs for the North Bend Residences and 16 for Vivian’s Village.

**Goal #17** – Continue partnership work with the St. Clair County Coordinated Point of Entry to lease-up and successfully administer the 48 Emergency Housing Vouchers awarded in 2021 under the Cares Act.

**Status** – *Goal achieved.* The program peaked at 50 EHV households under HAP Contract during 2022. As of September 2023 the program’s “sunset” provisions kicked-in which prohibit the issuance of a voucher to a new participant upon the exit of a current participant. As of February 2024 there were 37 EHV’s under contract with an additional 7 participants searching with vouchers.

**Attachment #B.5 – Narrative Statement Regarding Financial Audit**

## **FISCAL YEAR AUDIT (FYE 6/30/23)**

The last final and complete Financial Audit is for the fiscal year ending June 30, 2023. The audit was accepted by HUD. The audit was performed by Rector, Reeder & Lofton, P.C. The audit report includes the following components:

- Independent Auditor's Report
- Management Discussion and Analysis
- Audited Financial Statements
- Supplemental Information
- Internal Control Compliance

The Auditor's Report indicates that no material weaknesses in internal control over financial reporting were identified, no noncompliance material to financial statements was noted, no material weaknesses in internal control over major programs were observed. There was one finding identified that is required to be reported in accordance with Generally Accepted Government Auditing Standards (GACAS). The auditor identified an unacceptably high error rate in the annual income projections for the Housing Choice Voucher Program (HCVP). A corrective action plan was developed in conjunction with the auditor. This is the second consecutive fiscal year this finding has been identified.

The Auditor's Report issued on financial statements was unmodified, but qualified on compliance for major programs.

The full Audit Report for FYE-6/30/23 is on file at the SCCHA Central Office and is available for review upon request.

Prepared by: Larry McLean Date: January 16, 2024  
Larry McLean, Executive Director

**Attachment #C.1 – Resident Advisory Board Comments**

# Resident Advisory Board Regular Meeting February 14, 2024 Minutes

The regular meeting of the Resident Advisory Board (RAB) for the St. Clair County Housing Authority's Agency Plan was convened on February 14, 2024 at the Central Office, Belleville, IL.

The meeting was called to order by Jewel Lewis, Chairman, with the members present recorded on the attached sign-in sheet. Ms. Lewis expressed her appreciation to those in attendance. Ms. Lewis requested that Larry McLean, Executive Director, present the agenda items. Mr. McLean also welcomed those in attendance.

A motion was made, seconded, and passed to approve the minutes of the January 24, 2024 meeting.

Mr. McLean provided an opportunity for the members to follow up, review and/or request additional clarity on any of the items covered at previous meetings. There were no questions regarding issues / matters / materials reviewed at previous meetings, although Ms. Ogle used the opportunity to comment on the continuing dismal situation with the laundry room at the Bel-Plaza 2 building (virtually none of the washers and dryers are working). Mr. McLean said that staff continues to pursue a service contract with another vendor and is committed to making a change as soon as possible.

The tracking report related to RFTAs (Request for Tenancy Approvals) for the Housing Choice Voucher Program (HCVP) was reviewed by the members. Significant "take aways" from the report include the following.

- Nearly 92% of all Landlord Packets (RFTAs) presented are approved.
- Of the RFTAs not approved most are because of affordability (43.9%).
- The success rate for all household types (family, senior, disabled) are all over 90% with no statistical difference.
- There is no difference in the success rate based on race. Both African American and Caucasian households had RFTA success rates of nearly 92%.
- On average it took 4.2 days from inspection authorization to inspection completion.
- The average time from receipt of the RFTA to inspection is 8.9 days.
- The average time from receipt of the RFTA to final decision is 10.9 days.

Applicant Accessibility Reports for the public housing and HCVP were provided, reviewed and discussed. The major "take-aways" were:

- The most common accessibility need is for a ground floor unit;



- The percentage of applicants who reported a disability requiring some level of “mobility” accommodation ranged from nearly 15% for the HCVP to slightly more than 17% for public housing;
- 13%+ of applicants who reported a disability indicated they used a wheelchair;
- About 3% of disabled applicants indicated a hearing impairment while about 6.5% indicated a vision impairment.

The Statement of Housing Needs (for the jurisdiction) and Strategy for Addressing the Housing Needs was reviewed. Mr. McLean reminded the members he anticipated having to undertake a major re-write of this document because he assumed the St. Clair County Consolidated Plan (CP) would have been updated to reflect the 2020 Census data. However, Mr. McLean said when he reviewed the County’s CP it had not yet been updated with the latest census information. Therefore, changes to this section of the APU were limited to minor updates reflecting current SCCHA wait list and program turnover information. There was minimal discussion regarding the document.

The Status Report for the 2023 – 2024 Annual Plan Goals was reviewed and discussed. Mr. McLean explained there is considerable overlap between the annual goals and the five-year goals. The need to add Brooklyn (Amp 1) to the narrative for goal #2 was noted, as was the need for a couple of minor edits / corrections in other portions of the document.

The Status Report for the Five-Year Plan Goals (through the first three years) as of February 2024 was the next document reviewed. Mr. McLean commented that the document was updated to include information and activities from the last year and explained how these impacted the progress toward the established goals. Mr. McLean acknowledged the document was lengthy with few, if any, major changes from last year. With just a couple of exceptions, Mr. McLean said the report is available for the members to review and he would be pleased to answer any questions they may have today or at a future meeting. He highlighted the following:

- Instead of decreasing, as was the goal, the number of public housing vacant units increased significantly during the first four years of the plan period.
- The number of households assisted by the HCVP decreased from the 2,337 at the starting point of the current Five-Year Plan (1/2/2020) to 2,186 as of 2/1/2024;
- SCCHA continued to use the Project-Based Voucher (PBV) program to increase the affordable housing options in new developments in attractive locations;
- The HUD approved demolition of an additional 106 units in the Centreville neighborhood of Cahokia Heights is substantially complete with all residents successfully being relocated during 2023;
- SCCHA continues to obligate and expend all Capital Fund Program grant monies available for physical improvements to the public housing portfolio, however, there remains a huge backlog in needed capital improvements;
- SCCHA’s Designated Housing Plan is up for renewal by HUD for another two-year period effective May 1, 2024;

- SCCHA staff completed additional fair housing and reasonable accommodation training in 2020, 2021, 2022 and 2023 with more planned in 2024, and;
- The application for conversion of the public housing developments in O’Fallon (20 units) and Lebanon (24 units) to Project-based vouchers is under a CHAP (Commitment to Enter into a Housing Assistance Payment Contract) and work continues, albeit slow, to complete the conversion.

The tentative draft Annual Goals for the period 2024 – 2025 were reviewed. Mr. McLean noted there is little change in the goals for the next year.

Noting, although it is not a required component of the Agency Plan documents, Mr. McLean stated SCCHA has been compiling a Racial Concentration Analysis as part of the annual planning process for a number of years. The results are summarized in the report included in the meeting packet as item #10. Mr. McLean said the report demonstrates most of SCCHA’s public housing properties are racially diverse having minority populations equal to or greater than the census tract in which they are located. He noted some of the Centreville (Cahokia Heights) and Brooklyn public housing developments at or nearly 100% African American while the census tracts for these areas are in the high nineties. He noted the Washington Park public housing units are also 100% occupied by African Americans while the census tract is at 92%. He commented applicants are free to apply for any and all locations regardless of race ---explaining the 100% figure is a result of applicant preference and not any actions on the part of SCCHA. He also noted the census tract data reflects the 2020 Census data.

The Income Concentration Analysis was presented by Mr. McLean. He noted the following:

- The average income for all public housing developments is determined and then adjusted using a weighted-average methodology based upon bedroom size;
- Thresholds are set at the 85% and 115% levels of the overall weighted average of household income;
- Only developments / locations with 100 or more units are considered, resulting in only two locations this year --- Thomas Terry Apartments [TTA] (AMP 1) in Brooklyn and Private Mathison Manor [PMM] (AMP 2) Cahokia Heights.
- The ESSA development dropped off the analysis this year because with the second phase of demolition there are only 59 units in the AMP;
- The TTA locations had weighted-average household incomes within the established thresholds meaning there is no indication of income concentrations (low or high) in this development;
- The PMM development had the highest weighted average annual income and it fell outside of the 115% range. The occurrence is considered an anomaly and not the result of any income targeting by SCCHA.

Mr. McLean provided the members with information documenting the status of the proposed rule regarding Affirmatively Furthering Fair Housing (AFFH). Basically, there

has been no action regarding this federal policy initiative since the proposed rule was published in February 2023.

Information regarding the impact the implementation of HOTMA (Housing Opportunity Through Modernization Act) will have on SCCHA and residents was distributed and discussed. Mr. McLean explained that major changes to the HCVP Administrative Plan and Public Housing Admissions and Continued Occupancy Plan (ACOP) will be needed to comply with HOTMA. He explained these policy changes will take considerable time and effort to make and he does not have an exact timeframe for when the changes will be complete. He explained it his intent to notate in the 2024 Agency Plan Update (APU) that the HOTMA policy changes will be forthcoming, will be subject to a resident comment period, but will not represent a substantial deviation of the Agency Plan, thereby eliminating the need for a public hearing.

Mr. McLean explained the members have now reviewed all of the content of the 2024 Agency Plan Update except for the pending policy revisions. The next meeting will be convened when the policy revisions are ready for review and comment.

The meeting adjourned at approximately 11:30 a.m., with the members being provided lunch to go, since the meeting room was booked for an 11:45 a.m. training session. Mr. McLean thanked the members for their dedicated service during the agency plan update process. The members presented Mr. McLean with a card to show their appreciation to him and his many years of serving as the SCCHA staff liaison to the RAB, noting his pending retirement at the end of April.

Prepared by: Larry McLean Date: March 4, 2024  
Larry McLean, Executive Director

Authorized by: Mary Skees Date: March 4, 2024  
Mary Skees, Secretary

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**Resident Advisory Board**  
**Regular Meeting**  
**January 24, 2024**  
**Minutes**

The regular meeting of the Resident Advisory Board (RAB) for the St. Clair County Housing Authority's (SCCHA's) Agency Plan was convened on January 24, 2024 at the Central Office, Belleville, IL.

The meeting was called to order by Jewel Lewis, Chairman, with the members present recorded on the attached sign-in sheet. Ms. Lewis expressed her appreciation to those in attendance and requested that Mr. McLean present the agenda items. Mr. McLean also welcomed those in attendance.

A motion was made, seconded, and passed to approve the minutes of the January 10, 2024 meeting.

An opportunity was provided for the members to follow up, review and/or obtain additional clarity on any of the items covered at previous meetings. There were no questions from the members.

Regarding membership issues, a copy of the letters mailed under the name of Chairman Judy Lewis to prospective new members were provided. As discussed at the last meeting, Don Willams from Amber Court received a letter thanking him for his interest but explaining he was not added to the board because Amber Court was already represented. Erica Floyd from Private Mathison Manor received a letter thanking her for her interest but explaining she was not selected for membership because she is not in "good standing" under the lease agreement as determined by SCCHA. Blaine Mineman was invited to today's meeting as an observer to allow him an opportunity to learn more about the purpose of the RAB and how the organization operates. Mr. Mineman was in attendance and introduced himself, noting he lived in Clayton Manor in Marissa, explained why he is interested in joining the RAB, and shared some other things about what he does or has done. Mr. McLean and the members welcomed Mr. Mineman to the meeting.

The members were provided with an advance copy of the letter and attachments to be mailed to all public housing residents, Housing Choice Voucher Program (HCVP) participants, local officials, and organizations regarding the 2024 Agency Plan Update (APU) that will be available for review and comment in draft form February 16, 2024. The date opens the 45-day comment period for the 2024 APU. Mr. McLean also explained HCVP participants receive only the cover letter and not the attachments applicable only to the public housing program.

The Annual Plan template, form HUD-50075-ST was reviewed by the members in its draft form. Mr. McLean explained this is standard form that is used by most housing authorities across the country and is designed to provide important information regarding different housing authorities in a consistent manner. Mr. McLean explained that any "yes" responses in Sections B.1 and B.2 must be accompanied by an explanatory narrative. Various other aspects of the form were reviewed and discussed, including Mr. McLean noting that as of now PHAs (public housing authorities) are not required to complete Section D which relates to Affirmatively Furthering Fair Housing requirements.

An unexecuted copy of form HUD-50077-SL Certification by State or Local Official of PHA Plans Consistency with the Consolidated Plan or State Consolidated Plan was included in the meeting packet. Mr. McLean said he included the form to remind the members of the need for SCCHA' planned housing activities to be consistent with St. Clair County's housing plans as stated in the county's Consolidated Plan. He said historically there has been no issue in obtaining the County sign-off because SCCHA works closely with the County staff responsible for the Consolidated Plan. He also noted the form is not presented to the County Official for signature until later in the Agency Plan Update process.

Form HUD-50077-ST-HCV-HP Certification of Compliance was reviewed. Mr. McLean emphasized the significance and importance of this certification which is formally adopted by the Board of Commissioners as part of the Agency Plan Update approval.

Plan Element – Part 1 – Policies Governing Eligibility, Selection and Admissions was reviewed by the members. Mr. McLean explained nothing has changed in this required document of the Agency Plan in several years. There were no questions or comments regarding this plan element.

Rent Determination Policies, Plan Element – Part 2 was reviewed by the members. Mr. McLean noted "ceiling rents" are no longer used by SCCHA, the proposed Flat Rent Schedule for 2024 is out for resident comment through February 29, 2024, as is the Public Housing Utility Allowance Schedule. He also mentioned SCCHA has adopted a \$50 Minimum Rent and clarified the term "Minimum Rent" is before any allowance is deducted for tenant-paid utilities. The need to update the narrative to reflect the current payment standards for the HCVP was noted.

Mr. McLean reviewed Plan Element – Part 3 - Operation and Management with the members. The updated counts for the number of families / households under lease in public housing and other developments and HCVP participants under contract as of January 2, 2024, along with estimated turnover rates for the programs, were incorporated into the document.

The Administrative Grievance Policies for the Public Housing Program and Housing Choice Voucher Program (HCVP), which are contained in Plan Element – Part 4 were presented by Mr. McLean. He noted that the Grievance Policies have not changed in several years. There was no further discussion of these policies.

The Community Service and Self-Sufficiency Programs of SCCHA discussed in Plan Element – Part 6 were reviewed. Mr. McLean reminded the members of his opinion that the Community Service Requirement is unfair to public housing residents and an unnecessary burden to SCCHA because it does not apply to any other federal housing program except for the Public Housing Program. He reported that the number of individuals having to complete community service went down significantly when HUD made the determination there is a "work requirement" to receive SNAP benefits (food stamps).

Plan Element – Part 7 – Safety and Crime Prevention Measures was presented by Mr. McLean. He noted the communities of Cahokia Heights (the portion previously known as Centreville), Brooklyn and Washington Park are the primary focus because of the high crime rate in these communities. There was discussion that crime impacts all the public housing locations. Mr. Mineman noted there is criminal activity in the Marissa development (and community). Mr. McLean shared one important goal of SCCHA's crime prevention strategy is to ensure SCCHA properties (i.e., residents) receive the same level of law enforcement services provided to the community in which they are located. Mr. McLean reported SCCHA has applied for an Emergency Safety and Security Grant through the Capital Fund Program allocation every year

from 2014 through 2019 with no success. All applications prior to the 2019 application were determined to meet the "emergency need threshold." The 2019 application did not meet the "emergency" definition because of the lack of crime data within proximity of the development within the most recent twelve-month period (from application date). The 2019 application targeted security improvements at Bel-Plaza 1 & 2 and Amber Court in Belleville. Mr. McLean said he knows there is a significant level of criminal activity near the developments, but SCCHA was unable to obtain the incident reports from the Belleville Police Department to substantiate a qualifying level of criminal activity. Mr. McLean said SCCHA chose not to apply in 2020 because of the highly competitive nature of the grant program and the inability to get up-to-date crime statistics from local police departments to substantiate the "emergency" need. Mr. McLean said surprisingly, SCCHA received notification in 2020 HUD had excess funds (from 2019 and 2020 funding periods) due to the lack of eligible applications resulting in SCCHA's 2018 application being selected for funding. He advised the members the 2018 application targeted an upgrade of existing and the addition of new interior surveillance cameras at the Bel-Plaza 1 & 2 buildings in Belleville, along with perimeter fencing at Bel-Plaza 2. Mr. McLean said while he is pleased SCCHA was awarded these grant funds, he shared he was not sure if SCCHA would continue to pursue this grant in the future given the resources needed to apply and the little chance of being selected as a grant recipient. The members expressed their understanding.

The Public Housing Pet Policy was reviewed as Plan Element Part 8. Mr. McLean explained federal law requires a federal housing provider to allow pets in any apartment community designated for occupancy by senior citizens (age 62 or older) or persons with disabilities. He explained a senior citizen who resides in a family or general occupancy development does not have the legal right to a pet. He further explained another factor contributing to more dogs and cats being present in public housing is what he considers to be the abuse of the law requiring housing providers to allow companion or emotional support animals to a person with a disability as a reasonable accommodation. It was noted that animals qualifying as service, companion or emotional support animals are not considered pets and are not governed by the Pet Policy. There was considerable discussion regarding the issue of pets in public housing with the consensus among the members representing the public housing locations being support for SCCHA's Pet Policy serving as a deterrent to residents having pets in public housing communities using pet deposits, monthly fees, and other allowable means.

Plan Element – Part 9 – Narrative Statement Regarding Last Fiscal Year Audit was reviewed by the members. Mr. McLean reported that there was a repeat finding from the prior year related to what the auditors consider to be an excessively high error rate in projecting household income and making tenant rent determinations in the Housing Choice Voucher Program (HCVP). Mr. McLean said that he disagrees with the auditor's determination that an error rate of 6% - 7% is excessive and warrants a "finding." He noted that HUD awards some points under SEMAP (Section Eight Management Assessment Program) as long as the error rate is less than 20%. He added that the auditors were undeterred by his argument and SEMAP comparison and held to their "finding" level determination. Mr. McLean explained that an updated Correction Action Plan was submitted, and he is hopeful, but not overly so, that the finding will not be repeated in the next audit.

The members reviewed Plan Element – Part 10 – Violence Against Women Act (VAWA) Policies for admission and continued occupancy for the Public Housing and the HCV Programs. Mr. McLean reported there has been a significant increase in the number of residents / participants seeking VAWA protections and remedies. He noted the most recent re-authorization legislation provides for "self-certification" of being a victim of domestic violence and other situations covered under VAWA. He shared his concern the VAWA rules may discourage landlords from

participating in the HCV Program because he has heard landlords complain they cannot hold tenants to lease obligations once a tenant claims they are a victim under VAWA. Mr. McLean and the members expressed understanding and support for the intent of VAWA but also acknowledged the law is subject to abuse.

The Smoke-Free Public Housing Policy, Plan Element – Part II was reviewed. Several members commented regarding the lack of enforcement of the non-smoking provisions in the lease agreement by SCCHA management. Mr. McLean explained it is a matter of limited resources, noting Property Managers do not go out looking for violators, but rather only respond to complaints. He added even then enforcement is difficult. The damage to units caused by heavy smokers along with the difficulty and high cost of restoration at time of turnover were discussed.

The Narrative Statement Regarding Compliance with the Illinois Carbon Monoxide Alarm Detector (CMAD) act of January 1, 2007, a required attachment to the Agency Plan was reviewed. Mr. McLean confirmed SCCHA's compliance with this Illinois statute.

The Statement Regarding the Use of Project-Based Vouchers & Other Development Activities was reviewed and discussed by the members. Mr. McLean reported that SCCHA has a total of eighty-three (83) senior units under PBV Housing Assistance Payments Contracts; twenty-nine (29) at the Cottages at Cathedral Square in Belleville, eight (8) at Jazz at Walter Circle in East St. Louis, thirty (30) at the Lincoln Park Villas in O'Fallon and sixteen (16) at the Metro Landing @ Swansea.

Mr. McLean reported there are currently two developments under A-HAPC ( Agreement to Enter into a Housing Assistance Payments Contract):

- 50 units for The New Broadview, a senior development in East St. Louis, and;
- 10 units for Winstanley Park a family development in East St. Louis.

He also shared that SCCHA is actively working with developers representing two proposed tax-credit developments to A-HAP stage:

- 40 units for the North Bend Residences, a senior development in Fairview Heights, and;
- 16 units for Vivian's Village, a permanently supportive housing development in Cahokia Heights.

Mr. McLean reported SCCHA staff successfully relocated all the residents from the #30-08 portion of the Ernest Smith Sr. Apartments in Cahokia Heights which was approved for demolition by HUD in early 2023. Actual demolition of the buildings is underway.

The proposed conversion of the public housing units in O'Fallon and Lebanon from the public housing program to project-based vouchers is at CHAP (Commitment to enter into a Housing Assistance Payments Contract) stage with HUD but has been stuck awaiting a financing commitment letter from the lending institution. Once the commitment letter is received, SCCHA will submit the proposed "Finance Plan" which will make it one step closer to completing the conversion transaction. Mr. McLean said he expected the conversion process to take considerable time, but even he has been surprised and disappointed in how long it is taking.

Mr. McLean mentioned the statement references SCCHA's intent to do the following during the upcoming plan period.

- To submit a conversion application from public housing to PBV for the Hawthorne Terrace development in Cahokia Heights (formerly Alorton).
- Assess the potential for and possibly submitting additional RAD conversion applications in the upcoming plan period to convert additional public housing properties to the PBV or PBRA federal funding platform.
- Assessing the long-term viability of the public housing properties in Cahokia Heights (Private Mathison and Ernest Smith Sr. Apts.) and Brooklyn (Thomas Terry Apartments).

The members review an unexecuted copy of the Certification of No Challenged Elements that will be included in the draft 2024 APU. Mr. McLean commented that there have never been any challenged elements as long as the agency plan process has been in existence, and he hopes this year will be no different.

The recent frigid weather (with temperatures at or below zero for several days) was discussed. Mr. McLean said when the weather is that cold it is not a matter of "if" but "where" frozen water and/or sewer lines will occur. He said the most serious and most expensive to repair problems occurred in the Bel-Plaza 1 and 2 senior buildings with both sprinkler systems freezing up and having damaged parts. There were problems in several other locations, mostly caused by residents not cooperating by keeping the heat turned on, not keeping kitchen and bathroom cabinet doors open, and not keeping water trickling in bathroom and kitchen water faucets. Mr. McLean said it will take the maintenance staff a considerable time to recover from the incident, noting the extensive amount of wall and other repairs needed.

Upon discussion, a motion was made, seconded and passed to approve Blaine Mineman as a new RAB member representing the Marissa public housing location.

It was noted that the next meeting is scheduled for 10:00 a.m., Wednesday, February 14, 2024.

The meeting adjourned at approximately 12:00 noon, with the members being provided lunch. This time allowed for the opportunity for discussion of other issues of interest to the members.

Prepared by: Larry McLean Date: February 5, 2024  
Larry McLean, Deputy Director

Authorized by: Mary Skees Date: February 5, 2024  
Mary Skees, Secretary

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**Resident Advisory Board**  
**Regular Meeting**  
**January 10, 2024**  
**Minutes**

The regular meeting of the Resident Advisory Board (RAB) for the St. Clair County Housing Authority's (SCCHA's) Agency Plan was convened on January 10, 2024 at the Central Office, Belleville, IL.

The meeting was called to order by Jewel Lewis, Chairman, with the members present recorded on the attached sign-in sheet. Ms. Lewis expressed her appreciation to those in attendance. Ms. Lewis requested Mr. McLean to present the agenda items. Mr. McLean also welcomed those in attendance.

A motion was made, seconded, and passed to approve the minutes of the December 13, 2023 meeting. For the sake of expedience, Mr. McLean requested and was granted flexibility in discussion of the agenda items (by the various department directors). The minutes capture the order of discussion and do not follow the meeting agenda.

Tracy Jones, Asset Management Director and Orlando Rucker, Maintenance Supervisor, discussed the REAC inspection process and maintenance issues with the members. Ms. Jones reported the last public housing REAC inspections were completed in 2022 with all AMPs being subject to inspection. This issue was discussed at prior meetings, so discussion related to REAC inspections was limited. Ms. Jones explained that based upon the 2022 scores it was anticipated all AMPs would be inspected again in 2023, but no public housing properties were inspected by REAC in 2023. Gwendolene Court and Townhouse Court, both Multi-Family Housing properties, were the only properties inspected in 2023. She also noted the 2023 inspections were completed under the old inspection protocol, but future inspections to be completed using the new NSPIRE protocol that HUD has been developing and refining through field testing for years. Ms. Jones and Mr. Rucker explained that SCCHA conducts internal REAC inspections on its properties in an effort to prepare for the HUD REAC inspections. The REAC inspection discussion concluded with the notation that the NSPIRE inspection protocol puts more weight on the condition of unit interiors (compared to the existing protocol) and SCCHA will have to wait until the first round of inspections is completed and then do what is necessary to comply and maximize scores. Mr. McLean noted the potential of SCCHA having to divert significant funding from currently planned physical improvements to other work items to comply with the new inspection standards.

A variety of maintenance issues were discussed. The on-going challenge of completing vacant unit preparation, routine and preventive maintenance work orders, and conducting the internal REAC inspections and making the needed repairs / improvements was emphasized.

David Wright, Modernization Director, briefed the RAB members on the Capital Fund Program (CFP). Mr. Wright reported SCCHA does a good job of spending CFP monies on a timely basis, reporting to the members that the majority of monies for program year 2022 have been obligated, substantial progress has been made in obligating 2023 monies and in-house planning and / or A&E services are in progress for the remainder of 2023 monies. Mr. Wright recapped the major work items funded under the 2022 and 2023 CFP grants.

For modernization program year **501-22**: Work items completed or in progress are: Building demolition in IL30-08 in Cahokia Heights; Upgrade security system in IL30-06 Cahokia Heights; Retire security system in IL30-08 Cahokia Heights; RAD Rehabilitation Improvements in IL30-14 Lebanon and IL30-24 O’Fallon; Parking lot drainage and resurfacing in IL30-19 Lenzburg and IL30-28 Lenzburg; Remove and replace parking lot (Behind Jefferson and Oak Street units) in IL30-22 Millstadt; Parking and site improvements in IL30-10 Cahokia Heights.

For modernization program year **501-23**: Work items completed or in progress are: Pump station pond drive in IL30-09 in Brooklyn; Resurface streets and reseal and stripe parking lots in IL30-10 in Cahokia Heights; Security Surveillance in IL30-60,10 in Cahokia Heights; RAD Rehabilitation in IL30-11 in Cahokia Heights; Resurface and reseal parking lots in IL30-06 in Cahokia Heights; Heat tape and insulate drain lines in IL30-61 in Belleville; Elevator renovation, heating system shut-offs, bathroom renovations and heat pump replacement in IL30-16 in Belleville; Resurface streets and reseal and stripe parking lots, siding and door replacement in IL30-27 in Belleville; Kitchen and bathroom renovations, wall repair, flooring replacement, domestic waterline replacement, site drainage, window replacement and temporary resident relocation in IL30-22 in Millstadt; Kitchen and bathroom renovations in IL30-17 in Washington Park (20 one bedroom units).

Mr. Wright presented the draft 5 Year CFP Plan (herein after referred to as the “Plan”), noting the presumptive funding amount for each year of the plan available for physical work items to be \$2,777,447, the same as 2023. Mr. McLean cautioned this amount is subject to change with annual federal budget appropriations.

The draft Plan was included in the meeting packet provided to the members and there was considerable discussion.

The proposed year one of the plan was reviewed in detail. It includes the following work items.

AMP	PROPERTY	WORK ITEMS	DOLLAR AMOUNT
	<b>YEAR 1-2024</b>		
002	IL30-10 Cahokia Heights	Resurface Streets Reseal and Stripe Unit Parking Lots	\$200,000
	IL30-11 Cahokia Heights	RAD Rehabilitation Improvements	\$50,000
004	IL30-16 Belleville	Bathroom Renovations	\$450,000

	IL30-27 Belleville	Bathroom Renovations	\$797,447
	IL30-61 Belleville	Bathroom Renovations	\$700,000
	IL30-61 Belleville	Individual Heat Pump Replacement	\$300,000
	IL30-61 Belleville	Mechanical Upgrades	\$50,000
005	IL30-17 Washington Park	Kitchen and Bathroom Renovations-Family (10 units)	\$180,000
	IL30-17 Washington Park	Temporary Resident Relocation	\$50,000
	<b>Year 1-2024 Total</b>		<b>\$2,777,447</b>

Ms. Lewis commented that she and the other residents of the Fullerton Road Apartments in Swansea were very pleased with the bathroom renovations. Ms. Skees expressed her pleasure in seeing the Amber Court bathroom renovations planned for year one, noting it has been a long time coming.

The members were encouraged by Mr. McLean to have discussions of the Plan with the residents of the developments they represent. He also noted the members were receiving an "advance" copy of what will be mailed to residents with the February rent statements. The February mailing will open the sixty (60) day comment period on the CFP and will announce the forty-five (45) day comment period on the 2024 Agency Plan Update will start February 16, 2024.

Mr. McLean emphasized that with each out year the Plan becomes increasingly tentative and subject to change based upon unanticipated needs, actual funding levels, and other factors. Mr. Wright concluded his presentation by answering a variety of questions and listening to comments from the members regarding capital fund work and plans. Mr. Wright invited the members to contact him if they had any further questions and/or comments regarding the content of the Plan.

Nancy Schmidt, Finance Director, reported on SCCCHA finances matters, including budgets for the public housing and Section 8 Housing Choice Voucher Program (HCVP). The financial briefing started with a comparison of the total actual financial resources received for fiscal year ending (FYE) 6/30/23 and budgeted amounts for FYE 6/30/24 (reference the reports Ms. Schmidt distributed to the members).

Public Housing Operating Fund Subsidy is budgeted at a slightly lower amount for 2024 (\$3,733,645 compared to \$3,772,467 actual for FYE 6/30/23); monies available under the Capital Fund Program (grant year 2024 monies) is budgeted at \$3,427,375 for fiscal year 2024 compared to actual available at the close of FYE 6/30/23 of \$4,340,119 (which included all open CFP grants); the public housing dwelling rental income (resident payments) budget decreased (from \$2,177,446 to \$2,079,000); along with nominal changes in interest income (budgeted at \$12,600 for FYE-2024, down from actual interest income of \$13,071 in FYE-6/30/23) and other income (budgeted lower at \$104,500, down from \$123,446). It was noted that the budget for the Section 8 HCVP increased to \$14,904,000 from \$14,639,090 actual for FYE 6/30/23. Section

8 HCVP Administrative Fees are budgeted lower at \$1,671,796 for FY 2024, down from \$1,777,825.

A brief overview of the budgets for the Section 8 Program, Central Office Cost Center (COCC) and the Asset Management Property Groupings (AMPs) was provided. The need to budget for use of operating reserves to support certain AMPs was noted. It was noted that all AMPs reflect an operating loss (before applying operating reserves and with some monetary transfers among the AMPs).

Ms. Schmidt and/or Mr. McLean responded to a variety of questions from the members regarding the financial information presented.

The members expressed their appreciation to Ms. Jones, Mr. Rucker, Mr. Wright and Ms. Schmidt for the insightful presentations and ensuing discussions.

Mr. McLean provided additional information regarding the Housing Choice Voucher Program (HCVP) to supplement the information shared at the last meeting. The current income limits for the program were provided with an explanation that 75% of annual admissions to the HCVP are required to come from the extremely low-income category (not more than 30% of county median income adjusted by the number of family members).

A Payment Standard Schedule (PSS) that was approved by the SCCHA Board of Commissioners at their meeting earlier today was shared with the members. A dual PSS was maintained, one for zip codes 62208 and 62269 and another for the remainder of the county. Mr. McLean noted this is the second significant increase in the PSS in as many years and when fully implemented will increase average HAP (housing assistance payments) cost substantially, resulting in fewer families served by the HCVP unless there is a corresponding increase in federal HAP funding.

Mr. McLean advised the members SCCHA is required to establish a PSS based upon HUD's published Small Area Fair Market Rents (SAFMRs) by January 1, 2025, explaining the SAFMRs are based on zip codes. He said that he and the staff are researching viable options to limit the number of different PSS that have to be adopted to comply with the mandate, noting that as the number of PSSs increase so does the potential for misapplication (errors in determining tenant rent determinations). He shared that SCCHA's HCVP has had a financial audit finding the last two audit periods for an excessive error rate in tenant rent determinations and increasing the number of PSSs will make it more difficult to resolve this finding.

The members were provided with two Voucher Management Tracking (VMT) reports ---one covering the period from 2010 – 2023 and another covering 2019 - 2023. Important "take-aways" include:

- Almost 50% of applicants contacted to begin the screening process for the HCVP are withdrawn from the wait list;
- Only about one-third of those applicants contacted for HCVP eligibility screening are issued a voucher;
- The "success rate" (or utilization) has decreased dramatically in recent years ---from over 70% for all bedroom categories to less than 44% overall.
- Surprisingly, one bedroom voucher holders have the lowest success rate, with two- and three-bedroom voucher holders having the highest success rates.

- The average time it takes SCCHA to issue an applicant a voucher (from the date they are pulled from the waiting list) is improving (down from 111 to 105 days).
- Average time for voucher holders to “lease up” has increased from 90 to 118 days, providing another indication of the difficulty voucher holders face in finding a suitable unit and landlords willing to participate in the program.

Mr. McLean explained many of those who are unsuccessful in utilizing their vouchers within the 120-day term have either no or a poor prior rental housing history, do not have the funds to pay a security deposit and/or have large unpaid utility balances resulting in their inability to get utility services activated in their name.

Admissions Reports covering the period from July 1, 2023 to December 31, 2023 and just the month of December 2023 were provided to the members. The reports show that fiscal year to date 77% (89 of 115) of new admissions to the HCVP were from the extremely low-income (ELI) category, while in just the month of December only 67% were from this income category. Mr. McLean reminded the members of the requirement that 75% of annual admissions must come from the ELI category and staff must monitor this closely.

The members asked various questions regarding the information presented related to the HCVP with Mr. McLean providing a response.

SCCHA’s “Designated Housing Plan” was reviewed. Mr. McLean reported that the plan was originally adopted and approved by HUD in 2005 for a five-year term, with seven (7) two-year renewals being received in 2010, 2012, 2014, 2016, 2018, 2020 and most recently in 2022. With the most recent extension, the plan will expire April 30, 2024. Applying for and obtaining periodic two-year renewals of the Designated Housing Plan are stated goals in the 2020 (Five Year) Agency Plan (AP). The members expressed their strong support for the plan, noting that the senior citizen and younger disabled populations do not mix well in high density locations / environments.

The latest approved rent and utility allowance schedules for Gwendolene Court, Townhouse Court (both Multi-family Project-based Assistance properties) and Cedar Ridge (a Rural Development property) were provided to and reviewed with the members. Mr. McLean noted each federally assisted housing program has a separate method by which utility allowance schedules (and in some cases rent levels) are established.

Mr. McLean reviewed the Asset Management Table (AMT) with the members. The AMT reflects planned expenditures from the CFP over the five-year period and denotes those developments that are targeted for demolition and/or possible conversion under RAD (HUD’s Rental Assistance Demonstration program). The draft AMT denotes the HUD-approved demolition of 102 units in #30-08 in AMP 3 the Ernest Smith Sr. Apartments (AMP 3). Mr. McLean also noted #30-24 (O’Fallon) and #30-14 (Lebanon) both in AMP 5, along with 44 units in #30-11 (Hawthorne Terrace in Amp 2) are identified as “RAD Conversion Anticipated” during the next fiscal year.

The remaining portion of Amp 3, the part known as #30-6, Amp 2 (Cahokia Heights) and Amp 1 (Brooklyn) are identified for both potential RAD conversion and potential demolition. Every other public development is listed as under assessment for potential RAD conversion.

The Management Needs Assessment and 5 Year Plan were reviewed with Mr. McLean noting that the number of budgeted work items are down to three —professional development for the public housing management staff, resident council development and training, and computer

hardware and software and other electronic equipment. Mr. McLean explained that while the need remains for resident service coordination and technical support, drug prevention / elimination activities, that any funds budgeted for these purposes will be done so in the AMP operating budgets and not CFP Management Improvements. The continued challenge of meeting HUD's occupancy and unit turnaround time goals was noted, but again, no CFP monies are budgeted for this purpose. Mr. McLean noted that the sources of information that result in the management needs assessment include, but are not limited to, HUD reporting systems (PHAS, REAC inspections, etc.), RAB input, resident feedback, and financial and management audits.

Mr. McLean mentioned the federal government is operating under a continuing budget resolution that ends January 19<sup>th</sup>. He also noted that party leaders have agreed on a "top level" budget expenditure, but the difficult work of both houses of Congress hammering out a specific line-item budget remains. Hope that another federal government shutdown can be avoided was expressed by Mr. McLean and echoed by the members.

It was noted that the next meeting is scheduled for 10:00 a.m., Wednesday, January 24, 2024.

The meeting adjourned at approximately 12:00 noon, with the members being provided lunch. This time allowed for the opportunity for discussion of other issues of interest to the members.

Prepared by: *Larry McLean* Date: January 16, 2024  
Larry McLean, Deputy Director

Authorized by: *Mary Skees* Date: January 16, 2024  
Mary Skees, Secretary

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**Resident Advisory Board Annual Meeting  
December 13, 2023  
Minutes**

The **annual meeting** of the Resident Advisory Board of the St. Clair County Housing Authority was convened on December 13, 2023, at the SCCHA Central Office, Belleville, Illinois.

The meeting was called to order by Jewel Lewis, Chairman. Those members present are recorded on the attached sign-in sheet.

Ms. Lewis welcomed those in attendance and requested that Mr. McLean present the agenda items.

Mr. McLean also welcomed the members and thanked them for attending.

A motion was made, seconded, and passed to approve the minutes of the April 11, 2023 meeting.

Mr. McLean reported that the 2023 Agency Plan Update was submitted to HUD by the April deadline and SCCHA did not receive any notices of a technical deficiency, which means the plan was approved as presented. Mr. McLean reminded the members that HUD no longer issues letters of official approval. If HUD does not notify a PHA of a deficiency in the Agency Plan or Annual Update within seventy-five (75) days of submission it is considered approved.

The Administrative Plan for the RAB was reviewed in detail. No needed changes / updates were identified. The members were reminded that the purpose of the RAB is "To assist the Housing Authority and make recommendations regarding the development of the Public Housing Agency Plan..."

Regarding membership, it was noted that consistent with the Administrative Plan, the Belleville / Swansea Senior Resident Organization (BSSRO) needs to appoint residents from each location represented to serve on the RAB. Judy Lewis reported that she will continue to represent Swansea, Mary Skees will continue to represent Amber Court, Jacqueline Johnson will continue to represent Gwendolene Court, and Judith Ogle will continue to represent Bel-Plaza 2.

Upon discussion, it was mutually agreed (between Mr. McLean and the RAB members) that additional members should be solicited. Letters will be mailed to all public housing households, except for areas represented by the BSSRO, and to Housing Choice Voucher Program (HCVP) participants.

The election of officers for the 2024 term was completed. A motion was made by Jacqueline Johnson and seconded by Lillie Smith to nominate the same slate of officers for the 2024 agency plan cycle. Mr. McLean made three inquiries if there were any additional nominations, with none being heard. The motion passed unanimously by voice vote, resulting in Judy Lewis elected as President, Jacqueline Johnson as Vice-President, and Mary Skees as Secretary.

Mr. McLean advised the members the Section Eight Management Assessment Program (SEMAP) certification for the Housing Choice Voucher Program (HCVP) for the period ending 6/30/23 was submitted and SCCHA returned to "High Performer" status with a score of 96%.

Mr. McLean reported SCCHA received a "Substandard Performer Notification" related to the Public Housing Assessment System (PHAS) for fiscal year ending 6/30/2022. He explained the most points were lost in the "physical" (condition) category, with SCCHA receiving only 23 of a possible 40 points in this category. Mr. McLean noted SCCHA missed "standard" performer status by one point, scoring a 69 (while 70 is needed for a standard rating). He explained most points were lost in the management category (15 out of a possible 20 points) and the Capital Fund category (7 out of a possible 10 points) because of the high number of vacant units. He further explained that HUD made a one-point discretionary adjustment downward to account for the two public housing properties (Lebanon and O'Fallon) being officially in "conversion" status. That one-point adjustment resulted in the "substandard" designation. Mr. McLean said that he anticipates SCCHA will return to "standard" performer status for the public housing program for the period ending 6/30/2023 because vacant units in Amps 1, 2 and 3 will not be considered when determining overall occupancy rates because of the "market conditions" exemption granted by HUD in November 2022. The exemption period lasts for two years.

Mr. McLean reported that no public housing properties have undergone a REAC inspection to date in calendar year 2023. Only two non-public housing properties were inspected, Gwendolene Court (GC) and Townhouse Court (TC) and the scores were not great. TC scored 73 and GC scored an 80. Mr. McLean explained that TC is an eight-unit family development funded under the multi-family housing program. He said by all accounts the property is in good shape and should have scored higher. The members are familiar with GC, a 14-unit elderly property that is in very good condition. With a score of 80, GC will be inspected again in 2 years. TC will be inspected next year based upon the score of 73. Mr. McLean said these scores concern him because the two properties are in good physical condition and if they score this low, then there is virtually no chance the public housing properties will score well given the extent of the needed physical improvements. Additionally, Mr. McLean noted that these two inspections were completed using the UPCS which has been phased out by the NSPIRE standards which are expected to result in lower scores because of the emphasis on the interior condition of the units inspected.

Mr. McLean provided an update on the status of the second phase of demolition, totaling 102 units, in the Ernest Smith Sr. Apartments. He reported that all residents have been successfully relocated and all units are vacant. He said SCCHA has awarded a contract for the demolition work with the first phase of the work, hazardous material remediation, now underway. According to Mr. McLean the demolition work is scheduled to be completed by April 2024.

Mr. McLean provided an update on the RAD (Rental Assistance Demonstration) Program application to convert the public housing units in O'Fallon (20 units) and Lebanon (24 units) from public housing to project-based vouchers. He reported that the process has turned out to be slower and more cumbersome than even he anticipated. He said HUD has issued the CHAP (Commitment to enter into a Housing Assistance Payment Contract) and the "Concept Call" has taken place. The next milestone is submission of the "Financing Plan (FP)." He explained submission of the FP is considerably past due, but there are many factors in play that are beyond SCCHA's control. An example is how much the real estate mortgage market has changed since the conversion effort began. He explained that Commerce Bank, which initially indicated there would be no problem in providing the \$1 million plus rehabilitation loan, seems to have become very hesitant to make a binding commitment to the project. He said the project is not dead and he still hopes to bring it to closing during the first half of 2024.



The same reports under “Tenant Matters” provided to the Board of Commissioners at their regular monthly meetings were provided to the RAB members for review. The following reports were included in the RAB meeting packet:

- Public Housing Vacancy Report & Upcoming Vacancy Report
- Tenant Accounts Receivable (TARs) Report
- Public Housing and HCVP Tenant / Member Statistics
- Public Housing Move-in Report and Move-out Report
- HCVP Move-in Report and Move-out Report
- Waiting List Statistics Report.

There was discussion regarding the relatively large number of vacant public housing units, the high level of tenant accounts receivable, the demographic breakdown of the households in the public housing and HCV programs and on the wait lists. The consistency in the demographics from the waiting lists to both the public housing and HCV programs was noted.

The members also reviewed the reports of all the various site-based wait lists, including the four project-based voucher locations (Jazz @ Walter Circle, Cottages at Cathedral Square, Lincoln Park Villas and Metro Landing @ Swansea). The most significant observation was that in total there are more applicants on the one-bedroom list than any other list.

Mr. McLean shared with the members that SCCHA was under a HUD Fair Housing & Equal Opportunity Program Compliance Review stemming from its use of a jurisdiction admission selection preference. More specifically, the FHEO representatives expressed concern that SCCHA defined its “jurisdiction” for the public housing program as “all of St. Clair County, except for the City of East St. Louis (which has its own housing authority). The HUD representatives indicated that the jurisdiction definition discriminates against the residents of ESL which are overwhelming African American. Mr. McLean said that SCCHA has since changed the definition to include all of St. Clair County and it has been several months with no further contact from HUD FHEO.

The next item on the agenda was the Payment Standard Schedule (PSS) for the HCVP. Mr. McLean reminded the members of SCCHA’s April 2021 move to dual payment standards, one for zip codes 62208 (Fairview Heights), 62269 (O’Fallon) and one for the remainder of St. Clair County. He noted SCCHA increased the payment standard schedules to reflect 100% of the most recently issued (at the time) Fair Market Rents (FMRs) effective for August 9, 2023 for new admissions and moves and October 1, 2023 for annual recertifications. Mr. McLean explained that HUD has issued FMRs for 2024 and another update to the PSS during the APU cycle is possible.

The Utility Allowance Schedule (UAS) adopted for the HCVP effective February 1, 2024 was presented to the members for review. Mr. McLean explained there is no required resident / participant comment period for the HCVP UAS, although SCCHA tries to provide advance notice to participants and owners by putting the proposed UAS on its website prior to approval by the Board of Commissioners. Mr. McLean noted the UAS schedule decreased marginally based upon a reported decrease in Ameren Illinois electric rates in 2023 (compared to the same period in 2022).

An advanced copy of the proposed UAS for the public housing program for 2024 was provided and reviewed by the members. Mr. McLean noted the required sixty (60) day comment period

will run from January 1, 2024 to February 29, 2024 and the Board of Commissioners is scheduled to consider the UAS at their meeting on March 13, 2024 with an effective date of May 1, 2024. Similar to the HCVP UAS, there was a decrease in some parts of the public housing UAS, most notably for locations that are all-electric.

Mr. McLean reviewed a copy of the proposed Flat Rent Schedule for the public housing program. He noted the "resident comment," and implementation period will run concurrent with that of the UAS resulting in an effective date of May 1, 2024. He provided an overview of how the FRS is developed / calculated. Reports indicating that there are 76 "family" and 46 "senior" households at flat rent were provided and reviewed.

Citing information contained in a National Low-Income Housing Coalition (NLIHC) newsletter, Mr. McLean shared that HUD is currently funded under a continuing resolution (CR) that is scheduled to expire January 19, 2024. Mr. McLean said there is no immediate threat of an interruption of funding for the public housing and HCVP programs because HUD has authorized funding disbursements for January and February 2024.

Mr. McLean said that SCCHA would renew the membership of RAB members in the NLIHC.

The Tentative Calendar of Events for the 2024 Agency Plan Update was distributed to the members.

The meeting was adjourned at approximately 12:00 p.m.

The members were provided with lunch following the meeting, providing the opportunity for discussion of other issues of interest to the members.

Prepared by: Larry McLean Date: January 2, 2024  
Larry McLean, Executive Director

Authorized by: Mary Skees Date: January 2, 2024  
Mary Skees, Secretary

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**Attachment #C.2 – Certification by State or Local Official**

**Certification by State or Local  
Official of PHA Plans Consistency  
with the Consolidated Plan or  
State Consolidated Plan  
(All PHAs)**

U. S Department of Housing and Urban Development  
Office of Public and Indian Housing  
OMB No. 2577-0226  
Expires 3/31/2024

**Certification by State or Local Official of PHA Plans  
Consistency with the Consolidated Plan or State Consolidated Plan**

I, Richard Stubblefield, the Executive Director  
*Official's Name* *Official's Title*

certify that the 5-Year PHA Plan for fiscal years 2021-2025 and/or Annual PHA Plan for fiscal year 2025 of the St. Clair County Housing Authority is consistent with the  
*PHA Name*

Consolidated Plan or State Consolidated Plan including the Analysis of Impediments (AI) to Fair Housing Choice or Assessment of Fair Housing (AFH) as applicable to the

St. Clair County, IL  
*Local Jurisdiction Name*

pursuant to 24 CFR Part 91 and 24 CFR §§ 903.7(o)(3) and 903.15.

Provide a description of how the PHA Plan's contents are consistent with the Consolidated Plan or State Consolidated Plan.

*Addresses the need for affordable housing for low-income households on a non-discriminatory basis.*

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official:

Richard Stubblefield

Title:

Executive Director

Signature:

Date:

The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. This information is collected to ensure consistency with the consolidated plan or state consolidated plan.

Public reporting burden for this information collection is estimated to average 0.16 hours per year per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

**Attachment #C.3 – Form HUD-50077, PHA Certifications of Compliance with the PHA  
Plans and Related Regulations (Civil Rights Certification)  
(Form HUD-50077-ST-HCV-HP)**

## RESOLUTION #24-02

### **Certifications of Compliance with PHA Plan and Related Regulations (Standard, Troubled, HCV-Only, and High Performer PHAs)**

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
OMB No. 2577-0226  
Expires 3/31/2024

### **PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations including PHA Plan Elements that Have Changed**

*Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the 5-Year and/or X Annual PHA Plan, hereinafter referred to as "the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the PHA fiscal year beginning 7/1/2024, in connection with the submission of the Plan and implementation thereof:*

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located (24 CFR § 91.2).
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments (AI) to Fair Housing Choice, or Assessment of Fair Housing (AFH) when applicable, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan (24 CFR §§ 91.2, 91.225, 91.325, and 91.425).
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the RAB (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
4. The PHA provides assurance as part of this certification that:
  - (i) The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
  - (ii) The changes were duly approved by the PHA Board of Directors (or similar governing body); and
  - (iii) The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.
5. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
6. The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), title II of the Americans with Disabilities Act (42 U.S.C. 12101 et seq.), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program.
7. The PHA will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR § 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR § 903.7(o)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintains records reflecting these analyses and actions.
8. For PHA Plans that include a policy for site-based waiting lists:

- The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2011-65);
  - The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
  - Adoption of a site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
  - The PHA shall take reasonable measures to assure that such a waiting list is consistent with affirmatively furthering fair housing; and
  - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR 903.7(o)(1).
9. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
  10. In accordance with 24 CFR § 5.105(a)(2), HUD's Equal Access Rule, the PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
  11. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
  12. The PHA will comply with the requirements of Section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
  13. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
  14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
  15. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
  16. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
  17. The PHA will keep records in accordance with 2 CFR 200.333 and facilitate an effective audit to determine compliance with program requirements.
  18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
  19. The PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Financial Assistance, including but not limited to submitting the assurances required under 24 CFR §§ 1.5, 3.115, 8.50, and 107.25 by submitting an SF-424, including the required assurances in SF-424B or D, as applicable.
  20. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
  21. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
  22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

St. Clair County Housing Authority

IL030

PHA Name

X Annual PHA Plan for Fiscal Year 2025

PHA Number/HA Code

5-Year PHA Plan for Fiscal Years 20 - 20

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).

Name of Executive Director: Larry McLean

Name Board Chairman: Dan Barger

Signature

Date

Signature

Date

The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. This information is collected to ensure compliance with PHA Plan, Civil Rights, and related laws and regulations including PHA plan elements that have changed.

Public reporting burden for this information collection is estimated to average 0.16 hours per year per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.



**Attachment #C.4 – Certification of No Challenged Elements**

## Attachment #C.4 – Certification of No Challenged Elements

The St. Clair County Housing Authority certifies and attests that during and after the close of the **45-day Resident Comment Period and the Public Hearing held on April 3, 2024** no elements of the 2024 Annual Plan Update were challenged.

Certified by: Larry McLean Date: April 10, 2024  
Larry McLean, Executive Director

**Exhibit #1 – Carbon Monoxide Detector Law Compliance Statement**

## **CARBON MONOXIDE DETECTORS**

The St. Clair County Housing Authority has conformed the policies and practices of both the Public Housing and Section 8 Housing Choice Voucher Program (HCVP) Programs to comply with the requirements of the Illinois Carbon Monoxide Alarm Detector (CMAD) Act, which went into effect January 1, 2007.

Compliance activities completed on or before January 1, 2007 included but were not necessarily limited to the installation of Carbon Monoxide Detectors where required by law in all units owned / operated by SCCHA, revision of appropriate public housing (ACOP) and Section 8 HCVP (Administrative Plan) policies and sending a summary version of the Illinois Carbon Monoxide Alarm Detector (CMAD) Act to all residents.

**Exhibit #2 – Annual Plan Goals for Agency Plan 2024 - 2025**

## ANNUAL PLAN

### GOALS FOR JULY 1, 2024 – JUNE 30, 2025

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- 1) Return to or maintain “Standard Performer” designation under Public Housing Assessment System (PHAS) or replacement assessment program introduced by HUD. SCCHA was designated as “Physically troubled” for FYE 6/30/2022 based upon REAC Inspection Scores and the number of public housing vacancies. SCCHA anticipates a return to “Standard Performer” status when the assessments for FYE 6-30-23 are released based upon the vacancy exemption due to market conditions granted by HUD in November 2022.
- 2) Reduce the number of vacancies in Private Mathison Manor (AMP 2) to 12 or less and in Thomas Terry Apartments (AMP 1) to 6 or less by end of plan period (6/30/2025).
- 3) Retain “High Performer” designation under the Section 8 Management Assessment Program (SEMAP), or any replacement assessment program introduced by HUD, for the Housing Choice Voucher Program (HCVP).
- 4) Achieve net gain of at least 50 HCVP participants under contract by end of calendar year 2024 and additional 25 by end of plan period (6/30/2025). Starting count of participants under contract is 2193 as of 1/1/2024.
- 5) Continue to utilize Capital Fund Program (CFP) and any other funds available to upgrade / modernize the public housing stock consistent with the Five-Year CFP Plan, the most current physical needs assessment (PNA) and the “Green” PNA covering all AMPs. *Note: This will remain a goal until and unless any of public housing properties are converted under RAD or other “re-positioning” program or strategy, including demolition.*
- 6) Through partnerships with local law enforcement and prevention program service providers and other initiatives, keep the incidence of criminal activity at all public housing developments at a level less than or equal to the surrounding neighborhoods.
- 7) Comply with statutory and any HUD regulatory requirements to maintain site-based wait lists for public housing program.
- 8) Arrange for Fair Housing and Reasonable Accommodation Training for all staff involved in wait list, admissions and/or continued occupancy activities for all federal housing programs administered.
- 9) Dispose or determine re-use of approximately nine (9) acres of land that prior to demolition was the location of the one-hundred-twenty-six (126) public housing units that was the #30-08 portion of the Ernest Smith Sr. Apartments in Cahokia

Heights. Tenant relocation and building demolition was completed in the FYE-6/30/24.

- 10) Complete conversion of O'Fallon and Lebanon public housing properties to Project-Based Vouchers or Project-based Rental Assistance.
- 11) Submit RAD conversion application for Hawthorne Terrace in Alorton (44 family units) to Project-Based Vouchers.
- 12) Continue partnership with the Illinois Housing Development Authority (IHDA) and Southern Illinois Healthcare Foundation (SIHF) to complete Community Revitalization Plan for the Village of Brooklyn. This is the second location. A CRP was completed for Cahokia Heights during the FYE 6/30/2024.
- 13) Continue to assess potential for RAD conversion applications and/or demolition applications for all or portions of the properties included in AMP 1 (Brooklyn), AMP 2 (Private Mathison Manor – Centreville), AMP 3 (the #30-06 and #30-20 portion of the ESSA property in Centreville), AMP 4 (Belleville and Swansea senior buildings), AMP 5 (Washington Park) and/or AMP 6 (Marissa, Lenzburg, New Athens, Smithton, Millstadt and Dupo) consistent with comprehensive strategic plan completed in conjunction with IHDA and local stakeholders.
- 14) Continue work with the Illinois Department of Children and Family Services (IDCFS) to successfully administer Family Unification Program (FUP) Vouchers by achieving and maintaining the targeted 95 FUP households under contract.
- 15) Successfully administer a Family Self-Sufficiency Program serving both Housing Choice Voucher Program participants and public housing residents, while meeting or exceeding HUD's established performance measures and maintaining minimum participation level required to qualify for a full-time FSS Program Coordinator.
- 16) Within budgetary and regulatory constraints, continue utilization of Project Based-Voucher Program to address the housing needs of special needs or at-risk populations (such as the elderly and/or persons with disabilities) and/or increase affordable housing options in non-impacted or opportunity communities (as defined by the Illinois Housing Development Authority).
- 17) Continue administering the Emergency Housing Voucher (EHV) Program through "sunset." Federal regulations prohibited the issuance of an EHV to a new applicant after 9/30/2023. The EHVP was originally funded at forty-eight (48) vouchers. As of 2/1/2024 there were forty-three (43) with 36 under HAP contract and seven in the process of searching with a voucher.

**Exhibit #3 – Policy Excerpts Related to VAWA  
(Violence Against Women Act)**



## **VIOLENCE AGAINST WOMEN'S ACT POLICIES**

### **Narrative Statement**

In accordance with the Violence Against Women's Act (VAWA), the St. Clair County Housing Authority (SCCHA) will refer any applicant or program participant who indicates that they are a victim of domestic violence, dating violence, or stalking to the Violence Prevention Center located in Belleville, IL, (618) 235-0892. The Violence Prevention Center provides services for the following:

- a) Women and children affected by any form of abuse;
- b) Emergency Shelter;
- c) Counseling and
- d) Has a court advocate to assist in filing Orders of Protection on the client's behalf.

SCCHA has adopted policies for both its Public Housing Program (Admissions and Continued Occupancy Policy) and Section 8 Housing Choice Voucher Program (Administrative Plan) that are compliant with the requirements of VAWA (see attached excerpts).

**Part 1 --- Policy Provisions Related to Eligibility (Part 8 of Public Housing Admissions and Continued Occupancy Policy)**

***PROHIBITION AGAINST DENIAL OF ASSISTANCE TO VICTIMS OF DOMESTIC VIOLENCE, DATING VIOLENCE, AND STALKING [PUB.L. 109-162]***

The Violence Against Women Reauthorization Act of 2005 (VAWA) prohibits denial of admission to an otherwise qualified applicant on the basis that the applicant is or has been a victim of domestic violence, dating violence, or stalking. Specifically, Section 606(1) of VAWA adds the following provision to the U. S. Housing Act of 1937:

- A. That an applicant or participant who is or has been a victim of domestic violence, dating violence, or stalking is not an appropriate reason for denial of program assistance or for denial of admission, if the applicant otherwise qualifies for assistance or admission.

**Definitions**

As used in VAWA:

1. The term domestic violence includes felony or misdemeanor crimes of violence committed by a current or former spouse of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, or by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction.
2. The term *dating violence* means violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim; and where the existence of such a relationship shall be determined based on a consideration of the following factors:
  - a. The length of the relationship
  - b. The type of relationship
  - c. The frequency of interaction
3. The term *stalking* means:
  - a. To follow, pursue, or repeatedly commit acts with the intent to kill, injure, harass, or intimidate; or
  - b. To place under surveillance with the intent to kill, injure, harass, or intimidate another person; and
  - c. In the course of, or as a result of, such following, pursuit, surveillance, or repeatedly committed acts, to place a person in reasonable fear of the

death of, serious bodily injury to, or to cause substantial emotional harm to (1) that person, (2) a member of the immediate family of that person, or (3) the spouse or intimate partner of that person.

4. The term *immediate family member* means, with respect to a person:
  - a. A spouse, parent, brother or sister, or child of that person, or an individual to whom that person stands in the position or place of a parent; or
  - b. Any other person living in the household of that person and related to that person by blood and marriage.

### **Notification and Victim Documentation**

SCCHA acknowledges that a victim of domestic violence, dating violence, or stalking may have an unfavorable history that would warrant denial under the SCCHA's policies. Therefore, if the SCCHA makes a determination to deny admission to an applicant family, SCCHA will issue a written notice of denial, which will include notice of the applicant's right to appeal the decision through the established appeal process. The applicant will be offered the opportunity to provide documentation affirming that the cause of the unfavorable history is that a member of the applicant family is or has been a victim of domestic violence, dating violence, or stalking.

The documentation must include two elements:

- a. A signed statement by the victim that provides the name of the perpetrator and certifies that the incidents in question are bona fide incidents of actual or threatened domestic violence, dating violence, or stalking, and
- b. One of the following:
  1. A police or court record documenting the actual or threatened abuse, or
  2. A statement signed by an employee, agent, or volunteer of a victim service provider, an attorney, a medical professional, or another knowledgeable professional from whom the victim has sought assistance in addressing the actual or threatened abuse. The professional must attest under penalty of perjury that the incidents in question are bona fide incidents of abuse, and the victim must sign or attest to the statement.

The applicant must submit the required documentation within 10 days of the informal review or must request an extension in writing at that time. If the applicant so requests, the SCCHA will grant an extension of 10 business days, and will delay issuance of the informal review determination until after it has received the documentation or the extension period has elapsed. If after reviewing the documentation provided by the applicant the

SCCHA determines the family is eligible for assistance, a favorable decision notice will be issued and SCCHA will proceed with admission of the applicant family. If SCCHA determines the family is not eligible for assistance, an adverse decision notice will be issued.

### **Perpetrator Removal or Documentation of Rehabilitation**

In cases where an applicant family includes the perpetrator as well as the victim of domestic violence, dating violence, or stalking, SCCHA will proceed as above but will require, in addition, either (a) that the perpetrator be removed from the applicant household and not reside in the assisted housing unit or (b) that the family provide documentation that the perpetrator has successfully completed, or is successfully undergoing rehabilitation or treatment.

If the family elects the second option, the documentation must be signed by an employee or agent of a domestic violence service provider or by a medical or other knowledgeable professional from whom the perpetrator has sought or is receiving assistance in addressing the abuse. The signer must attest under penalty of perjury to his or her belief that the rehabilitation was successfully completed or is progressing successfully. The victim and perpetrator must also sign or attest to the documentation. This additional documentation must be submitted within the same time frame as the documentation required from the victim.

### **Confidentiality Requirements**

All information provided to SCCHA regarding domestic violence, dating violence, or stalking, including the fact that an individual is a victim of such violence or stalking, must be retained in confidence and may neither be entered into any shared database nor provided to any related entity, except to the extent that the disclosure (a) is requested or consented to by the individual in writing, (b) is required for use in an eviction proceeding, or (c) is otherwise required by applicable law.

## **Part 2 --- Policy Provisions Related to Terminating Tenancy (Part 20 of Public Housing Admissions and Continued Occupancy Policy)**

### **20.3 *TERMINATING THE TENANCY OF DOMESTIC VIOLENCE, DATING VIOLENCE, OR STALKING VICTIMS AND PERPETRATORS [PUB.L. 109-162, PUB.L. 109-271]***

The Violence Against Women Reauthorization Act of 2005 (VAWA) provides that “criminal activity directly relating to domestic violence, dating violence, or stalking, engaged in by a member of a tenant’s household or any guest or other person under the tenant’s control shall not be a cause for termination of assistance, tenancy, or occupancy rights if the tenant or an immediate member of the tenant’s family is the victim or threatened victim of that domestic violence, dating violence, or stalking.”

VAWA also gives SCCHA the authority to “terminate tenancy of any individual who is a tenant or lawful occupant and who engages in criminal acts of physical violence against family members or others, without evicting, removing, terminating assistance to, or otherwise penalizing the victim of such violence who is also a tenant or lawful occupant.”

VAWA does not limit the authority of SCCHA to terminate the assistance of any participant if SCCHA “can demonstrate an actual and imminent threat to other tenants or those employed at or providing service to the property if that tenant is not evicted or terminated from assistance.”

#### **1. Victim Documentation**

When a participant family is facing lease termination because of the actions of a participant, household member, guest, or other person under the participant’s control and a participant or immediate family member of the participant’s family claims that she or he is the victim of such actions and that the actions are related to domestic violence, dating violence, or stalking, SCCHA will require the individual to submit documentation affirming that claim.

The documentation must include two elements:

- a. A signed statement by the victim that provides the name of the perpetrator and certifies that the incidents in question are bona fide incidents of actual or threatened domestic violence, dating violence, or stalking, and
- b. One of the following:
  1. A police or court record documenting the actual or threatened abuse, or
  2. A statement signed by an employee, agent, or volunteer of a victim service provider, an attorney, a medical professional, or another knowledgeable professional from whom the victim has sought assistance in addressing the actual or threatened abuse. The

professional must attest under penalty of perjury that the incidents in question are bona fide incidents of abuse, and the victim must sign or attest to the statement.

The required certification and supporting documentation must be submitted to SCCHA within 14 business days after SCCHA issues its written request. The 14-day deadline may be extended at SCCHA's discretion. If the individual does not provide the required certification and supporting documentation within 14 business days, or the approved extension period, SCCHA may proceed with lease termination.

If SCCHA can demonstrate an actual and imminent threat to other participants or those employed at or providing service to the property if the participant's tenancy is not terminated, SCCHA will bypass the standard process and proceed with the immediate termination of the family's tenancy.

## **2. Terminating the Lease of a Domestic Violence Perpetrator**

Although VAWA provides lease termination protection for victims of domestic violence, it does not provide protection for perpetrators. VAWA gives SCCHA the explicit authority to "terminate assistance to any individual who is a tenant or lawful occupant and who engages in criminal acts of physical violence against family members or others...without terminating assistance to, or otherwise penalizing the victim of such violence who is a tenant or lawful occupant." This authority supersedes any local, state, or federal law to the contrary. However, if SCCHA chooses to exercise this authority, it must follow any procedures prescribed by HUD or applicable local, state, or federal law regarding termination of assistance [Pub.L. 109-271].

When the actions of a participant or other family member result in SCCHA's decision to terminate the family's lease and another family member claims that the actions involve criminal acts of physical violence against family members or others, SCCHA will request that the victim submit the above required certification and supporting documentation in accordance with the stated time frame. If the certification and supporting documentation are submitted within the required time frame, or any approved extension period, SCCHA will terminate the perpetrator's lease right. If the victim does not provide the certification and supporting documentation, as required, SCCHA will proceed with termination of the family's lease.

If SCCHA can demonstrate an actual and imminent threat to other tenants or those employed at or providing service to the property if the participant's tenancy is not terminated, SCCHA will bypass the standard process and proceed with the immediate termination of the family's lease.

## **3. PHA Confidentiality Requirements**

All information provided to SCCHA regarding domestic violence, dating violence, or stalking, including the fact that an individual is a victim of such violence or stalking,

must be retained in confidence and may neither be entered into any shared data base nor provided to any related entity, except to the extent that the disclosure (a) is requested or consented to by the individual in writing, (b) is required for use in an eviction proceeding, or (c) is otherwise required by applicable law.

**St. Clair County Housing Authority's (SCCHA's)**

**Public Housing Program's Emergency Transfer Plan for Victims of Domestic Violence,  
Dating Violence, Sexual Assault, or Stalking**

**Appendix S to the Admissions and Continued Occupancy Policy**

**Emergency Transfers**

The **St. Clair County Housing Authority (SCCHA)** is concerned about the safety of its tenants, and such concern extends to tenants who are victims of domestic violence, dating violence, sexual assault, or stalking. In accordance with the Violence Against Women Act (VAWA),<sup>1</sup> SCCHA allows tenants who are victims of domestic violence, dating violence, sexual assault, or stalking to request an emergency transfer from the tenant's current unit to another unit. The ability to request a transfer is available regardless of sex, gender identity, or sexual orientation.<sup>2</sup> The ability of SCCHA to honor such request for tenants currently receiving assistance, however, may depend upon a preliminary determination that the tenant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, and on whether SCCHA has another dwelling unit that is available and is safe to offer the tenant for temporary or more permanent occupancy.

This plan identifies tenants who are eligible for an emergency transfer, the documentation needed to request an emergency transfer, confidentiality protections, how an emergency transfer may occur, and guidance to tenants on safety and security. This plan is based on a model

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<sup>1</sup> Despite the name of this law, VAWA protection is available to all victims of domestic violence, dating violence, sexual assault, and stalking, regardless of sex, gender identity, or sexual orientation.

<sup>2</sup> Housing providers cannot discriminate on the basis of any protected characteristic, including race, color, national origin, religion, sex, familial status, disability, or age. HUD-assisted and HUD-insured housing must be made available to all otherwise eligible individuals regardless of actual or perceived sexual orientation, gender identity, or marital status.



emergency transfer plan published by the U.S. Department of Housing and Urban Development (HUD), the Federal agency that oversees that **SCCHA's Public Housing Program** is in compliance with VAWA.

### **Eligibility for Emergency Transfers**

A tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking, as provided in HUD's regulations at 24 CFR part 5, subpart L is eligible for an emergency transfer, if: the tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant remains within the same unit. If the tenant is a victim of sexual assault, the tenant may also be eligible to transfer if the sexual assault occurred on the premises within the 90-calendar-day period preceding a request for an emergency transfer.

A tenant requesting an emergency transfer must expressly request the transfer in accordance with the procedures described in this plan.

Tenants who are not in good standing may still request an emergency transfer if they meet the eligibility requirements in this section.

### **Emergency Transfer Request Documentation**

To request an emergency transfer, the tenant shall notify SCCHA's Property Management Office and submit a written request for a transfer to the **Property Manager with a copy submitted to the Asset Management Director at SCCHA's Central Office located at 1790 South 74<sup>th</sup> St., Belleville, IL 62223**. SCCHA shall provide reasonable accommodations to this policy for individuals with disabilities. The tenant's written request for an emergency transfer should include either:

1. A statement expressing that the tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant were to remain in the same dwelling unit assisted under SCCHA's program; OR
2. A statement that the tenant was a sexual assault victim and that the sexual assault occurred on the premises during the 90-calendar-day period preceding the tenant's request for an emergency transfer.

### **Confidentiality**

SCCHA will keep confidential any information that the tenant submits in requesting an emergency transfer, and information about the emergency transfer, unless the tenant gives SCCHA written permission to release the information on a time limited basis, or disclosure of the information is required by law or required for use in an eviction proceeding or hearing regarding termination of assistance from the covered program. This includes keeping confidential the new location of the dwelling unit of the tenant, if one is provided, from the person(s) that committed an act(s) of domestic violence, dating violence, sexual assault, or stalking against the tenant. See the Notice of Occupancy Rights under the Violence Against Women Act For All Tenants for more information about SCCHA's responsibility to maintain the confidentiality of information related to incidents of domestic violence, dating violence, sexual assault, or stalking.

### **Emergency Transfer Timing and Availability**

SCCHA cannot guarantee that a transfer request will be approved or how long it will take to process a transfer request. SCCHA will, however, act as quickly as possible to move a tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking to another unit, subject to availability and safety of a unit. If a tenant reasonably believes a proposed transfer

would not be safe, the tenant may request a transfer to a different unit. If a unit is available, the transferred tenant must agree to abide by the terms and conditions that govern occupancy in the unit to which the tenant has been transferred. SCCHA may be unable to transfer a tenant to a particular unit if the tenant has not or cannot establish eligibility for that unit.

If SCCHA has no safe and available units for which a tenant who needs an emergency is eligible, SCCHA will assist the tenant in identifying other housing providers who may have safe and available units to which the tenant could move. At the tenant's request, SCCHA will also assist tenants in contacting the local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, or stalking that are attached to this plan.

### **Safety and Security of Tenants**

Pending processing of the transfer and the actual transfer, if it is approved and occurs, the tenant is urged to take all reasonable precautions to be safe.

Tenants who are or have been victims of domestic violence are encouraged to contact the National Domestic Violence Hotline at 1-800-799-7233, or a local domestic violence shelter, for assistance in creating a safety plan. For persons with hearing impairments, that hotline can be accessed by calling 1-800-787-3224 (TTY).

Tenants who have been victims of sexual assault may call the Rape, Abuse & Incest National Network's National Sexual Assault Hotline at 800-656-HOPE, or visit the online hotline at <https://ohl.rainn.org/online/>.

Tenants who are or have been victims of stalking seeking help may visit the National Center for Victims of Crime's Stalking Resource Center at <https://www.victimsofcrime.org/our-programs/stalking-resource-center>.

**Attachment:** Local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, or stalking.

**Attachment: Local Assistance Organizations**

- Violence Prevention Center of Southwest Illinois – 618-236-2531

## **Part 1 --- Policy Provisions Related to Eligibility (Chapter 3 of Administrative Plan)**

### **3-III.G. PROHIBITION AGAINST DENIAL OF ASSISTANCE TO VICTIMS OF DOMESTIC VIOLENCE, DATING VIOLENCE, AND STALKING [Pub.L. 109-162]**

The Violence Against Women Reauthorization Act of 2005 (VAWA) prohibits denial of admission to an otherwise qualified applicant on the basis that the applicant is or has been a victim of domestic violence, dating violence, or stalking. Specifically, Section 606(1) of VAWA adds the following provision to Section 8 of the U.S. Housing Act of 1937, which lists contract provisions and requirements for the housing choice voucher program:

- That an applicant or participant is or has been a victim of domestic violence, dating violence, or stalking is not an appropriate reason for denial of program assistance or for denial of admission, if the applicant otherwise qualifies for assistance or admission.

#### **Definitions**

As used in VAWA:

- The term domestic violence includes felony or misdemeanor crimes of violence committed by a current or former spouse of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, or by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction.
- The term *dating violence* means violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim; and where the existence of such a relationship shall be determined based on a consideration of the following factors:
  - The length of the relationship
  - The type of relationship
  - The frequency of interaction between the persons involved in the relationship
- The term *stalking* means:
  - To follow, pursue, or repeatedly commit acts with the intent to kill, injure, harass, or intimidate; or
  - To place under surveillance with the intent to kill, injure, harass, or intimidate another person; and
  - In the course of, or as a result of, such following, pursuit, surveillance, or repeatedly committed acts, to place a person in reasonable fear of the death of, or serious bodily injury to, or to cause substantial emotional harm to (1) that person, (2) a member of the immediate family of that person, or (3) the spouse or intimate partner of that person.

- The term *immediate family member* means, with respect to a person:

- A spouse, parent, brother or sister, or child of that person, or an individual to whom that person stands in the position or place of a parent; or - Any other person living in the household of that person and related to that person by blood and marriage.

### **Notification and Victim Documentation**

The SCCHA acknowledges that a victim of domestic violence, dating violence, or stalking may have an unfavorable history that would warrant denial under the SCCHA's policies. Therefore, if the SCCHA makes a determination to deny admission to an applicant family, the SCCHA will include in its notice of denial a statement of the protection against denial provided by VAWA and will offer the applicant the opportunity to provide documentation affirming that the cause of the unfavorable history is that a member of the applicant family is or has been a victim of domestic violence, dating violence, or stalking.

The documentation must include two elements:

A signed statement by the victim that provides the name of the perpetrator and certifies that the incidents in question are bona fide incidents of actual or threatened domestic violence, dating violence, or stalking, and

One of the following:

A police or court record documenting the actual or threatened abuse, or A statement signed by an employee, agent, or volunteer of a victim service provider; an attorney; a medical professional; or another knowledgeable professional from whom the victim has sought assistance in addressing the actual or threatened abuse. The professional must attest under penalty of perjury that the incidents in question are bona fide incidents of abuse, and the victim must sign or attest to the statement.

The applicant must submit the required documentation with her or his request for an informal review (see section 16-III.D) or must request an extension in writing at that time. If the applicant so requests, the SCCHA will grant an extension of 10 business days, and will postpone scheduling the applicant's informal review until after it has received the documentation or the extension period has elapsed. If after reviewing the documentation provided by the applicant the SCCHA determines the family is eligible for assistance, no informal review will be scheduled and the SCCHA will proceed with admission of the applicant family.

### **Perpetrator Removal or Documentation of Rehabilitation**

In cases where an applicant family includes the perpetrator as well as the victim of domestic violence, dating violence, or stalking, the SCCHA will proceed as above but will require, in addition, either (a) that the perpetrator be removed from the applicant household and not reside in the assisted housing unit or (b) that the family provide documentation that the perpetrator has successfully completed, or is successfully undergoing, rehabilitation or treatment.

If the family elects the second option, the documentation must be signed by an employee or agent of a domestic violence service provider or by a medical or other knowledgeable professional from whom the perpetrator has sought or is receiving assistance in addressing the abuse. The signer must attest under penalty of perjury to his or her belief that the rehabilitation was successfully completed or is progressing successfully. The victim and perpetrator must also sign or attest to the documentation. This additional documentation must be submitted within the same time frame as the documentation required above from the victim.

### **SCCHA Confidentiality Requirements**

All information provided to the SCCHA regarding domestic violence, dating violence, or stalking, including the fact that an individual is a victim of such violence or stalking, must be retained in confidence and may neither be entered into any shared database nor provided to any related entity, except to the extent that the disclosure (a) is requested or consented to by the individual in writing, (b) is required for use in an eviction proceeding, or (c) is otherwise required by applicable law.

## **Part 2 – Policy Provisions Related to Terminating Assistance (Chapter 12 of Administrative Plan)**

### **12-III.E. TERMINATING THE ASSISTANCE OF DOMESTIC VIOLENCE, DATING VIOLENCE, OR STALKING VICTIMS AND PERPETRATORS [Pub.L. 109-162, Pub.L. 109-271]**

The Violence Against Women Reauthorization Act of 2005 (VAWA) provides that “criminal activity directly relating to domestic violence, dating violence, or stalking, engaged in by a member of a tenant’s household or any guest or other person under the tenant’s control shall not be a cause for termination of assistance, tenancy, or occupancy rights if the tenant or an immediate member of the tenant’s family is the victim or threatened victim of that domestic violence, dating violence, or stalking.” VAWA also gives SCCHA the authority to “terminate assistance to any individual who is a tenant or lawful occupant and who engages in criminal acts of physical violence against family members or others, without evicting, removing, terminating assistance to, or otherwise penalizing the victim of such violence who is also a tenant or lawful occupant.” VAWA does not limit the authority of the SCCHA to terminate the assistance of any participant if the SCCHA “can demonstrate an actual and imminent threat to other tenants or those employed at or providing service to the property if that tenant is not evicted or terminated from assistance.”

#### **Victim Documentation**

When a participant family is facing assistance termination because of the actions of a participant, household member, guest, or other person at the unit as a result of the participant’s occupancy and a participant or immediate family member of the participant’s family claims that she or he is the victim of such actions and that the actions are related to domestic violence, dating violence, or stalking the SCCHA will require the individual to submit documentation affirming that claim. The documentation must include two elements:

A signed statement by the victim that provides the name of the perpetrator and certifies that the incidents in question are bona fide incidents of actual or threatened domestic violence, dating violence, or stalking, and

One or more of the following:

A police or court record documenting the actual or threatened abuse (includes but is not limited to restraining orders and/or orders of protection), or

A statement signed by an employee, agent, or volunteer of a victim service provider; an attorney; a medical professional; or another knowledgeable professional from whom the victim has sought assistance in addressing the actual or threatened abuse. The professional must attest under penalty of perjury that the incidents in question are bona fide incidents of abuse, and the victim must sign or attest to the statement.



The required certification and supporting documentation must be submitted to the SCCHA within 14 business days after the SCCHA issues their written request. The 14-day deadline may be extended at the SCCHA's discretion. If the individual does not provide the required certification and supporting documentation within 14 business days, or the approved extension period, the SCCHA may proceed with assistance termination. The individual must take all actions within their control to prevent future incidents, including but not limited to cooperating with law enforcement, seeking court-issued orders of protection/restraining orders, and not granting the violator permission to visit the premises.

If the SCCHA can demonstrate an actual and imminent threat to other participants or those employed at or providing service to the property if the participant's tenancy is not terminated, the SCCHA will bypass the standard process and proceed with the immediate termination of the family's assistance.

### **Terminating the Assistance of a Domestic Violence Perpetrator**

Although VAWA provides assistance termination protection for victims of domestic violence, it does not provide protection for perpetrators. VAWA gives the SCCHA the explicit authority to "terminate assistance to any individual who is a tenant or lawful occupant and who engages in criminal acts of physical violence against family members or others...without terminating assistance to, or otherwise penalizing the victim of such violence who is also a tenant or lawful occupant." This authority supersedes any local, state, or other federal law to the contrary.

However, if the SCCHA chooses to exercise this authority, it must follow any procedures prescribed by HUD or by applicable local, state, or federal law regarding termination of assistance [Pub.L. 109-271].

When the actions of a participant or other family member result in a SCCHA decision to terminate the family's assistance and another family member claims that the actions involve criminal acts of physical violence against family members or others, the SCCHA will request that the victim submit the above required certification and supporting documentation in accordance with the stated time frame. If the certification and supporting documentation are submitted within the required time frame, or any approved extension period, the SCCHA will terminate the perpetrator's assistance. If the victim does not provide the certification and supporting documentation, as required, the SCCHA will proceed with termination of the family's assistance.

If the SCCHA can demonstrate an actual and imminent threat to other tenants or those employed at or providing service to the property if the participant's tenancy is not terminated, the SCCHA will bypass the standard process and proceed with the immediate termination of the family's assistance.

## **SCCHA Confidentiality Requirements**

All information provided to the SCCHA regarding domestic violence, dating violence, or stalking, including the fact that an individual is a victim of such violence or stalking, must be retained in confidence and may neither be entered into any shared data base nor provided to any related entity, except to the extent that the disclosure (a) is requested or consented to by the individual in writing, (b) is required for use in an eviction proceeding, or (c) is otherwise required by applicable law.

**Part 3 --- Policy Provisions Related to Notification of Applicants and Participants  
(Chapter 16 of Administrative Plan)**

**PART IX: NOTIFICATION REGARDING APPLICABLE PROVISIONS OF THE  
VIOLENCE AGAINST WOMEN REAUTHORIZATION ACT OF 2005 (VAWA)  
16-IX.A. NOTIFICATION TO APPLICANTS AND PARTICIPANTS [Pub.L. 109-162]**

VAWA requires SCCHA to notify public housing program participants of their rights under this law, including their right to confidentiality and the limits thereof.

The SCCHA will have available for all applicants and program participants flyers and/or informational brochures containing information regarding their protections and rights under VAWA at the time of admission and at annual reexamination.

The printed information will explain the protections afforded under the law, inform the participant of SCCHA confidentiality requirements, and provide contact information for local victim advocacy groups or service providers.

**16-IX.B. NOTIFICATION TO OWNERS AND MANAGERS [Pub.L. 109-162]**

VAWA requires SCCHA to notify owners and managers of their rights and responsibilities under this law.

Inform property owners and managers of their screening and termination responsibilities related to VAWA. The SCCHA may utilize any or all of the following means to notify owners of their VAWA responsibilities:

- As appropriate in day to day interactions with owners and managers
- Inserts in HAP payments, 1099s, owner workshops, classes, orientations, and/or newsletters
- Signs in the SCCHA lobby and/or mass mailings which include model VAWA certification forms

## **St. Clair County Housing Authority's (SCCHA's)**

### **Section 8 Housing Choice Voucher Program's (HCVP's) Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking**

#### **Exhibit #10-1, Chapter 10 of the Section 8 HCVP Administrative Plan**

#### **Emergency Transfers / Moves**

The **St. Clair County Housing Authority (SCCHA)** is concerned about the safety of its Section 8 HCVP participants, and such concern extends to participants who are victims of domestic violence, dating violence, sexual assault, or stalking. In accordance with the Violence Against Women Act (VAWA),<sup>3</sup> SCCHA allows participants who are victims of domestic violence, dating violence, sexual assault, or stalking to request an emergency transfer / move from the participant's current unit to another unit. The ability to request a transfer / move is available regardless of sex, gender identity, or sexual orientation.<sup>4</sup> The ability of SCCHA to honor such requests for participants currently receiving assistance, may depend upon a preliminary determination that the participant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, and on whether the participant meets or can meet other current SCCHA requirements regarding transfers / moves.

This plan identifies participants who are eligible for an emergency transfer / move, the documentation needed to request an emergency transfer / move, confidentiality protections, how an emergency transfer / move may occur, and guidance to participants on safety and security. This plan is based on a model emergency transfer plan published by the U.S. Department of Housing and Urban Development (HUD), the Federal agency that oversees that **SCCHA's Section 8 HCVP is compliant** with VAWA.

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<sup>3</sup> Despite the name of this law, VAWA protection is available to all victims of domestic violence, dating violence, sexual assault, and stalking, regardless of sex, gender identity, or sexual orientation.

<sup>4</sup> Housing providers cannot discriminate on the basis of any protected characteristic, including race, color, national origin, religion, sex, familial status, disability, or age. HUD-assisted and HUD-insured housing must be made available to all otherwise eligible individuals regardless of actual or perceived sexual orientation, gender identity, or marital status.

### **Eligibility for Emergency Transfers / Moves**

A participant who is a victim of domestic violence, dating violence, sexual assault, or stalking, as provided in HUD's regulations at 24 CFR part 5, subpart L is eligible for an emergency transfer / move, if the participant reasonably believes that there is a threat of imminent harm from further violence if the participant remains within the same unit. If the participant is a victim of sexual assault, the participant may also be eligible to transfer / move if the sexual assault occurred on the premises within the 90-calendar-day period preceding a request for an emergency transfer / move.

A participant requesting an emergency transfer / move must expressly request the transfer/ move in accordance with the procedures described in this plan.

Participants who are not in good standing may still request an emergency transfer / move if they meet the eligibility requirements in this section. However, being approved for an emergency transfer / move does not relieve the family of any financial obligations of the original lease.

### **Emergency Transfer / Move Request Documentation**

To request an emergency transfer / move, the participant shall notify and submit a written request for an emergency transfer / move to the **Section 8 HCVP Director at SCCHA's Central Office located at 1790 South 74<sup>th</sup> St., Belleville, IL 62223**. SCCHA shall provide reasonable accommodations to this policy for individuals with disabilities. The participant's written request for an emergency transfer / move should include either:

1. A statement expressing that the participant reasonably believes that there is a threat of imminent harm from further violence if the participant were to remain in the same dwelling unit assisted under SCCHA's program; OR
2. A statement that the participant was a sexual assault victim and that the sexual assault occurred on the premises during the 90-calendar-day period preceding the participant's request for an emergency transfer.

**Confidentiality**

SCCHA will keep confidential any information that the participant submits in requesting an emergency transfer / move and information about the emergency transfer / move, unless the participant gives SCCHA written permission to release the information on a time limited basis, or disclosure of the information is required by law or required for use in an eviction proceeding or hearing regarding termination of assistance from the covered program. This includes keeping confidential the new location of the dwelling unit of the participant (if the participant does transfer / moves to another unit) from the person(s) that committed an act(s) of domestic violence, dating violence, sexual assault, or stalking against the participant. See the Notice of Occupancy Rights under the Violence Against Women Act For All Participants for more information about SCCHA's responsibility to maintain the confidentiality of information related to incidents of domestic violence, dating violence, sexual assault, or stalking.

**Emergency Transfer / Move Timing and Availability**

SCCHA cannot guarantee that a transfer/ move request will be approved or how long it will take to process a transfer / move request. SCCHA will however, act as quickly as possible to issue a Section 8 HCVP Voucher to a participant who is a victim of domestic violence, dating violence, sexual assault, or stalking. If a participant reasonably believes a move to another unit within SCCHA's jurisdiction would not be safe, the participant may request that their voucher be approved for portability to the jurisdiction of another PHA where the participant believes she would be safe. If a participant determines that there are no safe and available units in SCCHA's jurisdiction and does not want to pursue portability at the time, the participant may request SCCHA assistance and SCCHA shall provide assistance in identifying other housing providers who may have safe and available units to which the participant could move. At the participant's request, SCCHA will also assist participants in contacting the local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, or stalking that are attached to this plan.

## **Safety and Security of Participants**

Pending processing of the transfer / move request and the actual transfer / move, if it is approved and occurs, the participant is urged to take all reasonable precautions to be safe.

Participants who are or have been victims of domestic violence are encouraged to contact the National Domestic Violence Hotline at 1-800-799-7233, or a local domestic violence shelter, for assistance in creating a safety plan. For persons with hearing impairments, that hotline can be accessed by calling 1-800-787-3224 (TTY).

Participants who have been victims of sexual assault may call the Rape, Abuse & Incest National Network's National Sexual Assault Hotline at 800-656-HOPE, or visit the online hotline at <https://ohl.rainn.org/online/>.

Participants who are or have been victims of stalking seeking help may visit the National Center for Victims of Crime's Stalking Resource Center at <https://www.victimsofcrime.org/our-programs/stalking-resource-center>.

**Attachment** - A list of local organizations that assist victims of domestic violence, dating violence, sexual assault, or stalking.

### **Attachment: Local Assistance Organizations**

- Violence Prevention Center of Southwest Illinois – 618-236-2531