

**St. Clair County  
Housing Authority's  
2025 Agency Plan  
Update**

**February 03, 2025**

## **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 – Proposed Changes in Operation and Management Policies**

- 2025 Public Housing Utility Allowance Schedule (B.1D1)
- 2025 Housing Choice Voucher Program Utility Allowance Schedule (B.1D2)
- 2025 Housing Choice Voucher Program Payment Standard (B.1D3)
- 2025 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 – 2025 Public Housing Utility Allowance Schedule**

**Attachment #B.1D2 – 2025 HCVP Utility Allowance Schedule**

**Attachment #B.1.D3 – 2025 Housing Choice Voucher Program Payment Standard**

**Attachment #B.1D4 – 2025 Public Housing Flat Rent Schedule (Based upon 2025 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 (2024 - 2025)**

**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 7/1/2025 – 6/30/2026**

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

<b>Annual PHA Plan</b> <i>(Standard PHAs and Troubled PHAs)</i>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 03/31/2024
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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.

A. PHA Information.						
A.1	PHA Name: <u>St. Clair County Housing Authority</u> <span style="float: right;">PHA Code: <u>11.030</u></span> PHA Type: <input checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA PHA Plan for Fiscal Year Beginning (MM/YYYY): <u>07/2025</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units <u>843</u> Number of Housing Choice Vouchers (HCVs) <u>2,165</u> Total Combined Units/Vouchers _____ PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission					
<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.						
<input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below)						
Participating PHAs		PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program	
					PHI	HCV
Lead PHA:						

**B. Plan Elements**

**B.1 Revision of Existing PHA Plan Elements.**

(a) Have the following PHA Plan elements been revised by the PHA?

Y N

- Statement of Housing Needs and Strategy for Addressing Housing Needs
- Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.
- Financial Resources.
- Rent Determination.
- Operation and Management.
- Grievance Procedures.
- Homeownership Programs.
- Community Service and Self-Sufficiency Programs.
- Safety and Crime Prevention.
- Pet Policy.
- Asset Management.
- Substantial Deviation.
- Significant Amendment/Modification

(b) If the PHA answered yes for any element, describe the revisions for each revised element(s):

(c) The PHA must submit its Deconcentration Policy for Field Office review.

**B.2 New Activities.**

(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?

Y N

- Hope VI or Choice Neighborhoods.
- Mixed Finance Modernization or Development.
- Demolition and/or Disposition.
- Designated Housing for Elderly and/or Disabled Families.
- Conversion of Public Housing to Tenant-Based Assistance.
- Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD.
- Occupancy by Over-Income Families.
- Occupancy by Police Officers.
- Non-Smoking Policies.
- Project-Based Vouchers.
- Units with Approved Vacancies for Modernization.
- Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

(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.

SCCHA awarded 85+/- 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, East St. Louis, and Swansea. Only one of these developments is being considered by IHDA (16 units in CH).

The above activities are consistent with the SCCHA Annual Plan because they either maintain existing or promote the development of new affordable housing opportunities.

**B.3 Progress Report.**

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.A

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 Actions Plan has been submitted and awaiting HUD approval.</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"/></p> <p>(b) If yes, please describe: Auditors determined the error rate in projecting annual income for participants in the HCVP and Low Rent Public Housing 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 type="checkbox"/> <input checked="" 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><i>Form HUD 50077-SL, 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><i>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,</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></p> <p>(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?</p> <p>Y N N/A  <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p>

<b>D.</b>	<b>Affirmatively Furthering Fair Housing (AFFH).</b>						
<b>D.1</b>	<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="177 678 1465 1137"> <tr> <td data-bbox="177 678 1465 723"><b>Fair Housing Goal:</b></td> </tr> <tr> <td data-bbox="177 723 1465 768"><u>Describe fair housing strategies and actions to achieve the goal</u></td> </tr> <tr> <td data-bbox="177 768 1465 1137">SCCHA is not required to submit an Assessment of Fair Housing at this time.</td> </tr> </table> <table border="1" data-bbox="177 1160 1465 1581"> <tr> <td data-bbox="177 1160 1465 1205"><b>Fair Housing Goal:</b></td> </tr> <tr> <td data-bbox="177 1205 1465 1249"><u>Describe fair housing strategies and actions to achieve the goal</u></td> </tr> <tr> <td data-bbox="177 1249 1465 1581">SCCHA is not required to submit an Assessment of Fair Housing at this time.</td> </tr> </table>	<b>Fair Housing Goal:</b>	<u>Describe fair housing strategies and actions to achieve the goal</u>	SCCHA is not required to submit an Assessment of Fair Housing at this time.	<b>Fair Housing Goal:</b>	<u>Describe fair housing strategies and actions to achieve the goal</u>	SCCHA is not required to submit an Assessment of Fair Housing at this time.
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**Fair Housing Goal:**

Describe fair housing strategies and actions to achieve the goal

SCCHA is not required to submit an Assessment of Fair Housing at this time.

**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)(e))

**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 IICV. (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 I 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(i)(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(h)).

**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-IICV-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-IIP, 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.

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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**

**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 2025)**

**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	5,775	100%
Extremely Low Income	4,843	84%
Very Low Income	639	9%
Low Income	246	4%
Singles	2,289	40%
Couples	1,463	25%
Families	2,023	35%
Elderly Families (62+)	767	13%
Families’ w/ disability	949	16%
White households	1,010	17%
Black households	4,542	79%
Other – race / ethnicity *	223	4%
Hispanic households	75	1%
Non-Hispanic households	5,543	96%

\*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 2025).

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	21,847	100%
Extremely Low Income	19,002	86%
Very Low Income	2,238	10%
Low Income	534	4%
Singles	11,272	51%
Couples	5,261	24%
Families	5,306	25%
Elderly Families (62+)	3,307	15%
Families’ w/ disability	4,987	23%
White households	3,737	17%
Black households	17,299	79%
Other – race / ethnicity *	9,720	44%
Hispanic households	225	1%
Non-Hispanic households	21,200	97%
Non-declared	408	2%
*Or none declared		
0 & 1 Bedroom	11,985	54%
2 Bedroom	6,562	30%
3 Bedroom	2,840	13%
4 Bedroom	450	2%
5+ Bedroom	10	1%

All public housing waiting lists remain open and the annual turnover is estimated at fifteen percent (17%) based upon the number of move-outs annually compared to the number of units occupied at the beginning of the calendar year 2025.

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 2025 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 vacant 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.



INCOME DE-CONCENTRATION WORKSHEET - APU 2025  
(Occupancy Data as of 3/10/25)

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 (2010 Census)
30-1	99	92	59	64%	5045.00	27.4%
30-9	40	39	28	72%		
30-12 Brooklyn	16	15	8	53%		
30-19	8	8	8	100%	5040.02	9.4%
30-28 Lenzberg	8	8	8	100%		
30-2	18	18	10	56%		
30-7 Marissa	14	13	12	92%		
30-3 Dupo	19	15	12	80%	5031.00	19.1%
30-5 Smithton	10	9	9	100%	5039.06	5.1%
30-6	51	47	30	64%	5027.00	43.3%
30-20 Cahokia Heights	8	8	8	100%		
30-10	110	100	60	60%	5028.00	42.4%
30-60	87	74	52	70%		
30-80 Cahokia Heights	16	12	7	58%		
30-11 Cahokia Heights	44	41	25	61%	5025.00	45.2%
30-13	16	16	9	56%	5040.01	4.6%
30-21 New Athens	16	16	11	69%		
30-14 Lebanon	24	22	11	50%	5043.02	11.2%
30-16	38	38	29	76%	5016.05	2.9%
30-27 Belleville	64	64	52	81%		
30-17 Washington Park	32	31	27	87%	5022.00	47.7%
30-18 Swansea	16	15	8	53%	5033.01	14.9%
30-22 Millstadt	18	18	13	72%	5032.03	14.9%
30-24 O'Fallon	20	19	12	63%	5043.51	4.6%
30-61 Belleville	48	46	38	83%	5019.00	12.4%

\* 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 06/30/2025

Public Housing Operating Fund Subsidy		\$4,057,500
Public Housing Capital Fund 2024 CFP Grant		\$3,497,483
Public Housing Dwelling Rental		\$2,185,000
Interest Income		\$32,700
Other Income-Maintenance Chrgs, Legal Fees, Laundry		\$78,800
Annual Contributions for Section 8	HAP	\$18,612,000
	Admin Fee	\$1,805,868
		\$30,269,351

## Summary of Financial Resources Actually Received for FYE 06/30/2024

Public Housing Operating Fund Subsidy		\$3,955,049
Public Housing Capital Fund---		
	2020	\$2,218
	2021	\$111,329
	2022	\$1,832,069
	2023	\$1,471,931
		\$3,417,547
Public Housing Dwelling Rental		\$2,170,137
Interest Income		\$37,160
Other Income-Maintenance Chrgs, Legal Fees, Laundry, Misc		\$89,999
Annual Contributions for Section 8	HAP	\$15,259,499
	Admin Fee	\$1,927,658

\*As of 02/01/2025

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

- 2025 Public Housing Utility Allowance Schedule (B.1D1)
- 2025 Housing Choice Voucher Program Utility Allowance Schedule (B.1D2)
- 2025 Housing Choice Voucher Program Payment Standard (B.1D3)
- 2025 PH Flat Rent Schedule (Based upon 2024SAFMRs) [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 – 2025 Public Housing Utility Allowance Schedule**

St. Clair County Housing Authority  
Public Housing Utility Allowance Sched  
Proposed Effective Date: May 1, 2025

Development		Bedroom Size					
		0	1	2	3	4	5
30-1	Brooklyn		90	104	116	127	138
30-2	Marissa			104	116	127	
30-2C <sup>1</sup>	Marissa			187			
30-3	Dupo	77	77	90	103	113	
30-5	Smithton		90		116	126	
30-6	Cahokia Heights		88	101	114	122	
30-60	Cahokia Heights		91	105	118	129	
30-7	Marissa		94				
30-80	Cahokia Heights			106	119		
30-9 Gas Heat	Brooklyn		136	166	194		
30-9A Electric Heat <sup>2</sup>	Brooklyn			200			
30-10	Cahokia Heights		92	104	118	129	
30-11	Cahokia Heights		118	138	165	184	
30-12	Brooklyn		141	168	198		
30-13	New Athens		158	195			
30-14	Lebanon		145	182	223		
30-16 (North 47th)	Belleville Bel-Plaza 2		72				
30-61 (S. Church)	Belleville Bel-Plaza 1		68				
30-17	Washington Park		139	167			
30-17A S/F House <sup>3</sup>	Washington Park			183			
30-18	Swansea		160				
30-19	Lenzburg		121	142			
30-20	Cahokia Heights		97				
30-21	New Athens		157				
30-22	Millstadt		163	212	264		
30-24A <sup>4</sup>	O'Fallon			120			
30-24B <sup>4</sup>	O'Fallon			198			
30-27	Belleville- Amber Ct		94	112			
30-28	Lenzburg			104	145		

Proposed Effective Date: 05/01/2025

Resident Comment Period: 11/01/2024-12/30/2024

Anticipated Board Approval Date: 02/18/2025

<sup>1</sup>Units = A11, 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 – 2025 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 <b>St Clair County Housing Authority, IL</b>		Unit Type: <b>Apartment (3 or More Units)</b>						Date (mm/dd/yyyy)	
Utility of Service	Fuel Type	0 BR	1 BR	2 BR	3 BR	4 BR	5 BR	6 BR	
Heating	Natural Gas	\$22.00	\$26.00	\$30.00	\$34.00	\$38.00	\$42.00	\$46.00	
	Bottle Gas	\$41.00	\$49.00	\$58.00	\$64.00	\$71.00	\$80.00	\$86.00	
	Electric	\$19.00	\$23.00	\$30.00	\$38.00	\$45.00	\$52.00	\$57.00	
	Electric Heat Pump	\$17.00	\$20.00	\$24.00	\$26.00	\$29.00	\$32.00	\$35.00	
	Fuel Oil	\$57.00	\$67.00	\$76.00	\$86.00	\$95.00	\$105.00	\$114.00	
Cooking	Natural Gas	\$3.00	\$3.00	\$5.00	\$7.00	\$9.00	\$10.00	\$11.00	
	Bottle Gas	\$6.00	\$6.00	\$9.00	\$13.00	\$17.00	\$19.00	\$21.00	
	Electric	\$6.00	\$7.00	\$10.00	\$13.00	\$17.00	\$20.00	\$21.00	
Other Electric		\$23.00	\$27.00	\$37.00	\$47.00	\$58.00	\$68.00	\$74.00	
Air Conditioning		\$9.00	\$10.00	\$14.00	\$18.00	\$22.00	\$26.00	\$28.00	
Water Heating	Natural Gas	\$8.00	\$9.00	\$12.00	\$15.00	\$20.00	\$23.00	\$25.00	
	Bottle Gas	\$15.00	\$17.00	\$22.00	\$28.00	\$37.00	\$43.00	\$47.00	
	Electric	\$15.00	\$18.00	\$22.00	\$27.00	\$32.00	\$37.00	\$40.00	
	Fuel Oil	\$19.00	\$22.00	\$29.00	\$38.00	\$48.00	\$57.00	\$60.00	
Water	<i>(Illinois American)</i>	\$63.00	\$64.00	\$80.00	\$96.00	\$111.00	\$127.00	\$137.00	
Sewer	<i>(Illinois American)</i>	\$65.00	\$68.00	\$94.00	\$120.00	\$146.00	\$172.00	\$190.00	
Sewer	<i>(City of Belleville)</i>	\$50.00	\$52.00	\$69.00	\$86.00	\$103.00	\$120.00	\$131.00	
Sewer	<i>(Sewer Treatment)</i>	\$26.00	\$27.00	\$38.00	\$48.00	\$59.00	\$70.00	\$77.00	
Trash Collection	<i>(avg)</i>	\$21.00	\$21.00	\$21.00	\$21.00	\$21.00	\$21.00	\$21.00	
<b>Other specify: Electric Charge \$14.61</b>		\$15.00	\$15.00	\$15.00	\$15.00	\$15.00	\$15.00	\$15.00	
<b>Other specify: Natural Gas Charge \$23.07</b>		\$23.00	\$23.00	\$23.00	\$23.00	\$23.00	\$23.00	\$23.00	
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 - May be used by the family to compute allowance while searching for a unit.</b>						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			



# 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)	
Utility of Service	Fuel Type	0 BR	1 BR	2 BR	3 BR	4 BR	5 BR	6 BR	
Heating	Natural Gas	\$28.00	\$34.00	\$38.00	\$44.00	\$48.00	\$52.00	\$57.00	
	Bottle Gas	\$52.00	\$64.00	\$71.00	\$82.00	\$90.00	\$97.00	\$107.00	
	Electric	\$28.00	\$33.00	\$42.00	\$51.00	\$60.00	\$69.00	\$75.00	
	Electric Heat Pump	\$20.00	\$24.00	\$29.00	\$32.00	\$36.00	\$39.00	\$42.00	
	Fuel Oil	\$73.00	\$86.00	\$95.00	\$108.00	\$120.00	\$133.00	\$143.00	
Cooking	Natural Gas	\$3.00	\$3.00	\$5.00	\$7.00	\$9.00	\$10.00	\$11.00	
	Bottle Gas	\$6.00	\$6.00	\$9.00	\$13.00	\$17.00	\$19.00	\$21.00	
	Electric	\$6.00	\$7.00	\$10.00	\$13.00	\$17.00	\$20.00	\$21.00	
Other Electric		\$29.00	\$34.00	\$47.00	\$60.00	\$73.00	\$86.00	\$93.00	
Air Conditioning		\$9.00	\$10.00	\$17.00	\$24.00	\$32.00	\$39.00	\$42.00	
Water Heating	Natural Gas	\$9.00	\$11.00	\$15.00	\$20.00	\$24.00	\$29.00	\$32.00	
	Bottle Gas	\$17.00	\$21.00	\$28.00	\$37.00	\$45.00	\$54.00	\$60.00	
	Electric	\$19.00	\$22.00	\$28.00	\$34.00	\$40.00	\$46.00	\$50.00	
	Fuel Oil	\$22.00	\$25.00	\$38.00	\$51.00	\$60.00	\$73.00	\$79.00	
Water	<i>(Illinois American)</i>	\$63.00	\$64.00	\$80.00	\$96.00	\$111.00	\$127.00	\$137.00	
Sewer	<i>(Illinois American)</i>	\$65.00	\$68.00	\$94.00	\$120.00	\$146.00	\$172.00	\$190.00	
Sewer	<i>(City of Belleville)</i>	\$50.00	\$52.00	\$69.00	\$86.00	\$103.00	\$120.00	\$131.00	
Sewer	<i>(Sewer Treatment)</i>	\$26.00	\$27.00	\$38.00	\$48.00	\$59.00	\$70.00	\$77.00	
Trash Collection	<i>(avg)</i>	\$21.00	\$21.00	\$21.00	\$21.00	\$21.00	\$21.00	\$21.00	
<b>Other specify: Electric Charge \$14.61</b>		\$15.00	\$15.00	\$15.00	\$15.00	\$15.00	\$15.00	\$15.00	
<b>Other specify: Natural Gas Charge \$23.07</b>		\$23.00	\$23.00	\$23.00	\$23.00	\$23.00	\$23.00	\$23.00	
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			



The Nelrod Company 9/2024 Update-Addl Work 2/18/25

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: <b>St Clair County Housing Authority, IL</b>		Unit Type: <b>Single-Family House/Detached</b>						Date (mm/dd/yyyy)	
Utility of Service	Fuel Type	0 BR	1 BR	2 BR	3 BR	4 BR	5 BR	6 BR	
Heating	Natural Gas	\$32.00	\$37.00	\$44.00	\$49.00	\$54.00	\$60.00	\$64.00	
	Bottle Gas	\$60.00	\$69.00	\$82.00	\$92.00	\$103.00	\$112.00	\$120.00	
	Electric	\$44.00	\$51.00	\$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	\$79.00	\$92.00	\$108.00	\$120.00	\$136.00	\$149.00	\$162.00	
Cooking	Natural Gas	\$3.00	\$3.00	\$5.00	\$7.00	\$9.00	\$10.00	\$11.00	
	Bottle Gas	\$6.00	\$6.00	\$9.00	\$13.00	\$17.00	\$19.00	\$21.00	
	Electric	\$6.00	\$7.00	\$10.00	\$13.00	\$17.00	\$20.00	\$21.00	
Other Electric		\$33.00	\$39.00	\$54.00	\$70.00	\$85.00	\$100.00	\$108.00	
Air Conditioning		\$7.00	\$8.00	\$18.00	\$28.00	\$37.00	\$47.00	\$51.00	
Water Heating	Natural Gas	\$9.00	\$11.00	\$15.00	\$20.00	\$24.00	\$29.00	\$32.00	
	Bottle Gas	\$17.00	\$21.00	\$28.00	\$37.00	\$45.00	\$54.00	\$60.00	
	Electric	\$19.00	\$22.00	\$28.00	\$34.00	\$40.00	\$46.00	\$50.00	
	Fuel Oil	\$22.00	\$25.00	\$38.00	\$51.00	\$60.00	\$73.00	\$79.00	
Water	<i>(Illinois American)</i>	\$63.00	\$64.00	\$80.00	\$96.00	\$111.00	\$127.00	\$137.00	
Sewer	<i>(Illinois American)</i>	\$65.00	\$68.00	\$94.00	\$120.00	\$146.00	\$172.00	\$190.00	
Sewer	<i>(City of Belleville)</i>	\$50.00	\$52.00	\$69.00	\$86.00	\$103.00	\$120.00	\$131.00	
Sewer	<i>(Sewer Treatment)</i>	\$26.00	\$27.00	\$38.00	\$48.00	\$59.00	\$70.00	\$77.00	
Trash Collection	<i>(avg)</i>	\$21.00	\$21.00	\$21.00	\$21.00	\$21.00	\$21.00	\$21.00	
<b>Other specify: Electric Charge \$14.61</b>		\$15.00	\$15.00	\$15.00	\$15.00	\$15.00	\$15.00	\$15.00	
<b>Other specify: Natural Gas Charge \$23.07</b>		\$23.00	\$23.00	\$23.00	\$23.00	\$23.00	\$23.00	\$23.00	
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 - May be used by the family to compute allowance while searching for a unit.</b>						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>Mobile Home</b>					Date (mm/dd/yyyy)	
Utility of Service	Fuel Type	0 BR	1 BR	2 BR	3 BR	4 BR	5 BR	6 BR
Heating	Natural Gas	\$27.00	\$32.00	\$37.00	\$41.00	\$46.00		
	Bottle Gas	\$50.00	\$60.00	\$69.00	\$77.00	\$86.00		
	Electric	\$46.00	\$54.00	\$56.00	\$58.00	\$59.00		
	Electric Heat Pump	\$20.00	\$24.00	\$29.00	\$32.00	\$36.00		
	Fuel Oil	\$67.00	\$79.00	\$92.00	\$105.00	\$114.00		
Cooking	Natural Gas	\$3.00	\$3.00	\$5.00	\$7.00	\$9.00		
	Bottle Gas	\$6.00	\$6.00	\$9.00	\$13.00	\$17.00		
	Electric	\$6.00	\$7.00	\$10.00	\$13.00	\$17.00		
Other Electric		\$33.00	\$39.00	\$54.00	\$70.00	\$85.00		
Air Conditioning		\$8.00	\$10.00	\$17.00	\$23.00	\$30.00		
Water Heating	Natural Gas	\$9.00	\$11.00	\$15.00	\$20.00	\$24.00		
	Bottle Gas	\$17.00	\$21.00	\$28.00	\$37.00	\$45.00		
	Electric	\$19.00	\$22.00	\$28.00	\$34.00	\$40.00		
	Fuel Oil	\$22.00	\$25.00	\$38.00	\$51.00	\$60.00		
Water	<i>(Illinois American)</i>	\$63.00	\$64.00	\$80.00	\$96.00	\$111.00		
Sewer	<i>(Illinois American)</i>	\$65.00	\$68.00	\$94.00	\$120.00	\$146.00		
Sewer	<i>(City of Belleville)</i>	\$50.00	\$52.00	\$69.00	\$86.00	\$103.00		
Sewer	<i>(Sewer Treatment)</i>	\$26.00	\$27.00	\$38.00	\$48.00	\$59.00		
Trash Collection	<i>(avg)</i>	\$21.00	\$21.00	\$21.00	\$21.00	\$21.00		
<b>Other specify: Electric Charge \$14.61</b>		\$15.00	\$15.00	\$15.00	\$15.00	\$15.00		
<b>Other specify: Natural Gas Charge \$23.07</b>		\$23.00	\$23.00	\$23.00	\$23.00	\$23.00		
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 - May be used by the family to compute allowance while searching for a unit.</b>						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		
Number of Bedrooms						Range / Microwave		
						Refrigerator		
						Total		



**Attachment #B.1D3-2025 Housing Choice Voucher Program Payment Standard**

To: Board of Commissioners

Fr: Vera Jones, Executive Director  
Pam Jackson, Program Director



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

Dt: August 29, 2024

**We are recommending the Housing Choice Voucher Program (HCVP) Payment Standard Schedules (PSS) as shown below.**

The following amounts for all zip codes in St. Clair County except for 62208 (Fairview Heights), 62254 (Lebanon), 62265 (New Baden), 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>
\$924 (-\$4)	\$968 (-\$4)	\$1,199 (-\$10)	\$1,551 (-\$14)	\$1,804 (-\$14)	\$2,074 (-\$16)

The following amounts for zip codes 62208 (Fairview Heights), 62254 (Lebanon), 62265 (New Baden) 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>
\$1,130 (+\$50)	\$1,170 (+\$40)	\$1,440 (+\$30)	\$1,860 (+\$30)	\$2,140 (+\$20)	\$2,461 (+\$23)

*Notes: 1) All of the above amounts are based upon the landlord furnishing all utilities and the stove and refrigerator. 2) The numbers in parentheses indicate the change in the amount of the payment standard proposed compared to the existing payment standards.*

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

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.

We received notice early this year from HUD that we were mandated to start using Small Area Fair Market Rents (SAFMRs), which are zip code based, no later than January 1, 2025. This could have resulted in as many as thirty-three (33) different payment standards. Fortunately, the SAFMRs implementation guidance provides for the "grouping" of various zip codes into one payment standard to "minimize the administrative burden of managing multiple payment standard areas."

Payment standards are an integral part of the tenant rent determination process. As you are aware, the HCVP is currently operating under a corrective action plan as a result of two consecutive years of an audit finding of too high of an error rate in tenant rent determinations. This was our primary consideration in recommending the continued use

of two payment standard schedules. The more payment standard schedules there are the more opportunity to make an error in the rent determination process.

**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 actually dropped over the last few years due to a variety of factors). You approved a recommendation to significantly increase the payment standard schedules effective January 10<sup>th</sup>, 2024 for new admissions and moves and March 1, 2024 for annual recertifications. The intent was to improve housing options for participating families (so they could afford better quality units with higher rents) and to reach at least 98% utilization of HAP budget authority.

We knew that average HAP (housing assistance payment) would increase significantly as higher payment standards were implemented. The goal was and remains for these two factors (increased lease up and higher average HAP cost) to combine to achieve budget utilization rates that meet or exceed the HUD target of 98%.

It is noted that the recommended PSS for most of the county is slightly lower than the current PSS. However, as mentioned, all payment standards increased significantly earlier this year, and we do not anticipate the nominal decrease will adversely affect lease-up in these municipalities. Also, the more notable increases for zip codes 62208, 62254, 62265 and 62269 is anticipated to increase lease-up in these more desirable areas (especially Fairview Heights and O'Fallon) and further push average HAP upward.

**Therefore, your approval of the new payment standard schedules effective September 11, 2024 for moves and new admissions and November 1, 2024 for annuals is respectfully recommended.**

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 – 2025 Public Housing Flat Rent Schedule (Based upon 2025 SAFMRs)**



To: Board of Commissioners

Fr: Vera Jones, Executive Director   
Meisha Kerby, Asset Management Director 

Re: Proposed 2025 Flat Rent Schedule for the Public Housing Program

Dt: February 11, 2025

Board approval of the attached "2025 Public Housing Flat Rent Schedule" at the February 18, 2025 meeting is requested. Some brief comments are warranted.

The proposed 2025 Flat Rent Schedule includes flat rents that for all locations are substantially higher than the flat rents currently in effect. The increases range from a low of \$165 (for a one-bedroom unit in Swansea ---62226 zip code) to \$467 (for a three-bedroom single family home in Lebanon ---zip code 62254. The increase is the direct result of the substantial increase in the HUD published Fair Market Rents.

The basic formula for calculating flat rents is:

**Fair Market Rents x 80% (HUD maximum reduction) – Utility Allowance = Flat Rent**

As stated above, flat rents are determined by the HUD-issued Fair Market Rents [FMRs] and the utility allowance for each property. Both FMRs and utility allowances will increase this year, but the increase in the FMRs is much greater, offsetting the increase in utility allowances across the board.

It is also worth noting that the Small Area Fair Market Rent (by zip code) was used, compared to the area wide FMR, because for most public housing locations the SMFMR is less than the area-wide FMR ---which results in a lower Flat Rent. This is a benefit to most residents.

Lebanon, Millstadt and O'Fallon have SAFMRs much higher than the area wide FMR.

Higher flat rents has an adverse impact on the number of vacant units annually. As residents' rents increase, they are more likely to move-out to the private sector unit.

We are pleased to answer any questions you may have.

## Public Housing Flat Rent Schedule

### Bedroom Size

	<u>Efficiency</u>	<u>1 Br.</u>	<u>2 Br.</u>	<u>3 Br.</u>	<u>4 Br.</u>	<u>5 Br.</u>	<u>Comments</u>
Cahokia Heights - (Hawthorne-011)		\$ 586	\$ 734	\$ 963	\$ 1,128		
Belleville (Amber Court- 027)		\$ 610	\$ 760				
Belleville (Bel-Plaza 1 - Church - 061)		\$ 644					
Belleville (Bel-Plaza 2 - N. 47 <sup>th</sup> - 016)		\$ 632					
Brooklyn -Thomas Terry - 001		\$ 614	\$ 768	\$ 1,012	\$ 1,185	\$ 1,371	
Brooklyn -TT - 009 (Gas Heat)		\$ 568	\$ 706	\$ 934			
Brooklyn -TT - 009(Elec Heat)			\$ 672				
Brooklyn -TT - 012		\$ 563	\$ 704	\$ 930			
Cahokia Heights - ESS (006)		\$ 616	\$ 771	\$ 1,014	\$ 1,190		
Cahokia Heights - ESS (008)		\$ 611	\$ 766	\$ 1,009		\$ 1,368	
Cahokia Heights - ESS (020)		\$ 607					
Cahokia Heights - PMM (010)		\$ 612	\$ 768	\$ 1,010	\$ 1,183		
Cahokia Heights - PMM (060)		\$ 613	\$ 767	\$ 1,010	\$ 1,183		
Cahokia Heights - PMM (080)			\$ 766	\$ 1,009			
Dupo	\$ 595	\$ 627	\$ 782	\$ 1,025	\$ 1,199		
Lebanon (Garden Ridge - 014)		\$ 727	\$ 890	\$ 1,161			
Lenzburg (019)		\$ 583	\$ 730				
Lenzburg (028)			\$ 768	\$ 983			
Marissa (002)			\$ 768	\$ 1,012	\$ 1,185		
Marissa (002 - C)			\$ 685				
Marissa (007)		\$ 610					
Millstadt		\$ 677	\$ 828	\$ 1,080			
New Athens (Phillips - 013)		\$ 578	\$ 709				
New Athens (South Clinton - 021)		\$ 579					
O'Fallon (024-A)			\$ 1,032				(garden / flats)
O'Fallon (024-B)			\$ 954				(TH tenant pays wtr/swr)
Smithton (005)		\$ 614		\$ 1,012	\$ 1,186		
Swansea (Fullerton Rd - 018)		\$ 544					
Washington Park (017- Scattered)		\$ 565	\$ 705				(2-BR-four plex)
Washington Park (017- Scattered)			\$ 689				(2-BR-SF home)

**Proposed Effective Date: 05/01/2025**  
**Resident Comment Period: 11/01/2024-12/30/2024**  
**Anticipated Board Approval Date: 02/18/2025**

**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, SCCHA'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 11c				
#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 (\$0) - 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 In Process	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	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	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

- 50 PBVs for the New Broadview Development in East St. Louis

The New Broadway and the Winstanley Park developments progressed to PBV A-HAP stage in 2023. The “Lofts” request for PBVs was denied because it would have replaced existing housing subsidies being received by the City of Belleville. The two Centreville (now Cahokia Heights) proposals were not selected by IHDA for tax-credit funding.

In 2020 SCCHA issued an RFP for PBVs and as a result conditionally awarded 48 PBVs to support the development of the East of Eden senior project in Lebanon. The project did not obtain the local zoning changes needed to move forward.

SCCHA issued another RFP for PBVs in December 2021 with proposals due February 2, 2022. Two proposals received conditional PBV awards. The Avalon at O’Fallon a proposed fifty-six (56) unit family development (two and three-bedroom units) which requested fourteen (14) PBVs. The North Bend Residences, a proposed sixty (60) unit elderly development which requested fifteen (15) PBVs. Neither of these projects were awarded tax-credits by IHDA and did not move forward.

SCCHA issued another RFP for PBVs in October 2022 with proposals due November 16, 2022. Five proposals were received and four were conditionally awarded PBVs, including:

- **Nineteen (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.
- **Thirteen (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
- **Sixteen (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)
- **Nine (24) PBVs (4 one-bedroom, 2 two-bedroom, 6 three-bedroom family units, 5 five two-bedroom and 7 seven 3 three bedroom) at Vivian’s Village (Phase 2)**, located at or near 5710 Bond Avenue, Cahokia Heights)

The only proposal selected for potential IHDA tax credit funding was the Permanently Supportive Housing development (Vivian’s Village – Phase 1). This project is expected to reach A-HAP stage and IHDA financial closing during the first half of 2024.

SCCHA desires to support the affordable housing initiatives of St. Clair County and other municipalities in its jurisdiction using the PBV program and anticipates issuing an RFP during the during the upcoming agency plan period.



**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 that 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. The surveillance system and other security enhancements have been completed (during calendar year 2022).

SCCHA is seeking funding through the CFP emergency safety and security grants for the year 2025. If awarded, these funds will be allocated to improve the security measures at Pvt. Mathison Manor. Planned enhancements include the installation of fiber optic cables to ensure more reliable Wi-Fi connectivity, the addition of night vision cameras for improved surveillance capabilities, the implementation of speed bumps to reduce vehicular speeds, and necessary repairs to existing security infrastructure. Collaborating with two local police departments, we were able to obtain relevant crime data from law enforcement to substantiate our application, demonstrating that the crime rates in the vicinity of the development meet the emergency criteria outlined in the Notice of Funding Availability (NOFA). This collaboration is part of a broader interagency agreement aimed at supporting the community by addressing crime and providing resources for families, including trauma support and conflict resolution training.

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

## FIVE-YEAR PLAN STATUS REPORT – FEBRUARY 2025 – YEAR 5

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

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 (2024 – 2025)**

**2025 ANNUAL PLAN UPDATE  
STATUS REPORT ON CURRENT YEAR GOALS  
AS OF FEBRUARY 2025**

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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 ratings is increasingly possible due to the number of public housing vacancies resulting from approved and planned demolition activities.

**Status:** *Goal Achieved.* SCCHA returned to “Standard Performer” status when the 00assessments for FYE 6-30-24 were released based upon the vacancy exemption due to market conditions granted by HUD in November 2022. SCCHA has continued to maintain “Standard Performer” as of March 2025.

**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, the 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:** *Not on track to achieve goal.* SCCHA did not achieve "High Performer" status in SEMAP for its HCVP for the fiscal year ending June 30, 2023. Nevertheless, with the implementation of additional measures, including an external consultant's review of our processes, we are confident about attaining success in the 2024 audit.

**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). The starting count of participants under contract is 2209.

**Status:** *On track to achieve goals* Participants / units under HAP contract starting at 2209 as of February 2025, we have a total of 2090 under contract. The monthly fluctuations in this number can be attributed to various factors, some of which are outside the control of SCCHA. These include unexplained program exits, terminations due to significant non-compliance with family obligations, and challenging rental market conditions characterized by rapidly rising rents, high demand, and limited inventory. Additionally, there has been a notable decline in the success rates for new voucher

holders compared to previous years. Nevertheless, we remain optimistic that the target will be met by June 2025.

**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* Interagency agreements have been formed with various law enforcement agencies to enhance collaboration. The SCCHA team is actively partnering with local police departments to implement strategies aimed at crime deterrence and to develop prevention programs for the community residents. Additionally, SCCHA is in the process of applying for a safety and security grant to support these initiatives.

**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. The agency worked with an outside contractor to review the process. The agency is progressing well towards achieving its objectives, with a target completion date set for June 30, 2025.

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

**Status:** *Notable progress achieved.* The SCCHA team has successfully concluded the Fair Housing Training, and the session on Reasonable Accommodation is set to take place in May 2025. The agency is progressing well and is on schedule to achieve its objective by June 30, 2025.

**Goal #9** - Complete relocation of residents impacted by the HUD approved demolition of the remaining #30-08 units in AMP 3 Ernest Smith Sr. Apartments in Cahokia Heights. Complete demolition of buildings.

**Status: *Goal Achieved.*** All residents were relocated, and the buildings have been demolished. The demolition contractor completed all the assigned work in May 2024.

**Goal #10** – Complete RAD conversion of O’Fallon and Lebanon public housing properties to Project-based Vouchers.

**Status: *Notable progress achieved.*** SCCHA has submitted conversion applications to HUD for the public housing units in O’Fallon (20 units) and Lebanon (24 units) and was awarded a CHAP (Commitment to Enter into a Housing Assistance Payments Contract). The conversion is set to occur within the final 90 days of the closing process. The objective is to finalize conversion by June 2025.

**Goal #11** – Submit RAD conversion application for Hawthorne Terrace in Alorton (44 family units) to Project-based Vouchers.

**Status – *No progress to date.*** The SCCHA 2-person Modernization Staff is working at capacity. Additionally, SCCHA’s engineering firm is working at capacity. There simply have not been the staffing resources on multiple levels to accomplish this task. Additionally, given the much longer than anticipated time frame in completing the RAD conversion for SCCHA’s two other properties, management is reassessing the best approach to (and even whether or not it should) pursue tackling a second RAD conversion.

**Goal #12** – Continue partnership with the Illinois Housing Development Authority (IHDA) and Southern Illinois Healthcare Foundation (SIHF) to complete Community Revitalization Plan (CRP) for Cahokia Heights and potentially move on to second community, probably the Village of Brooklyn.

**Status – *Phase one completed.*** The CRP for Cahokia Heights has been completed. SCCHA, SIHF and IHDA have entered into an agreement for the next CRP which will be for the Village of Brooklyn. The CRP for Brooklyn is not expected to be completed until the final quarter of 2024 (into the next plan year).

**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** – *On track to achieve goal.* There were only 91 FUP households under contract as of February 1, 2025. SCCHA will continue to work with IDCFS and other partners to achieve this goal. The agency is progressing well and is on schedule to achieve its objective by June 30, 2025.

**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 made significant progress with entering 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, 10 for Winstanley Park, 40 PBVs for the North Bend Residences and 24 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. By February 2024, all EHV contracts were finalized. The program is considered a success.

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

## **FISCAL YEAR AUDIT (FYE 6/30/24)**

The last final and complete Financial Audit is for the fiscal year ending June 30, 2024. 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 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 Low Rent Public Housing Tenant Files Eligibility. A corrective action plan was developed in conjunction with the auditor. This is the first 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-6/30/24 is on file at the SCCHA Central Office and is available for review upon request.

Prepared by: Vera Jones Date: January 03, 2025  
Vera Jones, Executive Director



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

Resident Advisory Board  
Regular Meeting  
January 15, 2025  
Minutes

The monthly meeting of the Resident Advisory Board (RAB) for the St. Clair County Housing Authority (SCCHA) was convened on January 16, 2025, at the Central Office, Belleville, IL.

**Attendees:**

- **RAB:** Jewel Lewis (Chairman), Mary Skees (Secretary), Blaine Mineman
- **SCCHA:** Vera Jones (Executive Director), Pam Jackson (Programs Director), Nancy Schmidt (Director of Finance), Nick Urban (Director of Modernization), Meisha Kerby (Director of Asset Management), Melissa Zurbrugg (Property Manager), Erika Shelton (Office Manager), Orlando Rucker (Supervisor of Maintenance)

The meeting commenced at 10:00 AM, led by Vera Jones, Executive Director.

The meeting was called to order by Jewel Lewis, Chairman, with the members present recorded on the attached sign-in sheet. Ms. Lewis requested Ms. Dabbs to present the agenda items.

The meeting commenced with a discussion centered on the critical need for diversification and the recruitment of new members. There was a strong emphasis on the significance of ensuring representation from all AMPs, as this is essential for accurately identifying the challenges that residents encounter. Furthermore, this initiative serves as a valuable opportunity for all sites to gain insights into issues that they may not be fully aware of, thereby fostering a more comprehensive understanding of the residents' needs.

Orlando Rucker, Supervisor of Maintenance, discussed the importance of cooperation from the tenants during inspections so that SCCHA can receive good scores, which increases our chances of being raised to a standard PHA instead of the substandard PHA status we currently hold. Good inspection scores will also get us more grants, which will better equip us for site repairs. Ms. Jones suggested we have biannual community meetings at all sites to better prepare the tenants for these inspections. This will also give them a chance to be more involved. Ms. Jones addressed the current substandard rating of SCCHA, emphasizing the agency's commitment to restoring its status to standard. Ms. Jones highlighted that this rating does not reflect the dedication and effort of the entire team. To enhance the overall scores, the agency plans to implement more frequent inspections throughout the year, ensuring continuous improvement and accountability in their operations.

Mr. Blaine Mineman, RAB member, asked about the placement of properties in the Cap Fund 5-year plan, specifically why Marissa had not moved up to the funding list from previous years. Mr. Urban explained the general way the funding list worked and how properties are prioritized based on several different factors, including funding estimates, inspection results, and unforeseen occurrences, which was ultimately the reason Marissa was pushed back.

Jewel Lewis, RAB Chairman, raised the question: at what point do we knock down properties and rebuild instead of the constant repairs since we're spending so much money anyway? Ms. Jones explained that as appealing as that sounds, it's easier said than done. The amount of funds needed to renovate one unit is indeed high; however, it pales in comparison to the amount of funds needed for the demo process, relocation of tenants, and a whole new site build. If the bones of the property are good, we can only maintain the property.

Pam Jackson, Programs Director, asked if anyone knew what the voucher program was, and the members of the board did not. Ms. Jackson explained what the voucher program was and that it was slightly underutilized with the numbers being around 2100 out of 2120 utilization. This was because of numerous factors such as safety of credit, the afforded area, affordability, and availability. There are over 8,000 families on the waiting list, which seems unusual compared to other PHAs, but this is because other PHAs close their list as opposed to collecting applicants (we keep ours open to avoid the chaos that comes with the acceptance of too many applications at one time). Ms. Jones reiterated that this speaks to the importance of representation from not only the many AMPs within St. Clair County but the voucher program as well so that challenges from all sides can be addressed during the consideration of our policies. Ms. Jones also stated the importance of prioritizing relationships outside of the Housing Authority so our residents could have better access to resources.

Nancy Schmidt, the Director of Finance, provided an overview of the projected funding for the fiscal year 2025, contrasting it with the budget from the previous year. She clarified that the figures presented were preliminary estimates, as the official budget had not yet been received. Ms. Schmidt inquired whether there were any questions. Ms. Lewis sought further explanation regarding the distribution of funds allocated to the laundry line item as detailed in the financial report. Ms. Schmidt explained that it was an old expense from washer/dryers we used to have at some of the properties, but we no longer have them on any of our properties.

The meeting adjourned at approximately 11:27 AM.

Prepared by: Erika Shelton, SCCHA Office Manager

2/3/2025

**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 2024 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

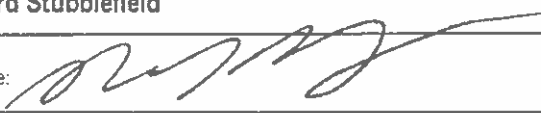
St. Clair County, IL  
*Local Jurisdiction Name*

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: <b>Richard Stubblefield</b>	Title: <b>Executive Director</b>
Signature: 	Date: <b>4/4/23</b>

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)**

**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 7/1/2025, 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).



Annual PHA Plan for Fiscal Year **2025**

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: <b>Vera Jones</b>		Name Board Chairman: <b>Dan Barger</b>	
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 2, 2025** no elements of the 2024 Annual Plan Update were challenged.

Certified by: Vera Jones Date: \_\_\_\_\_  
Vera Jones, 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 Period 7/1/25 – 6/30/26**

**ANNUAL PLAN**  
**GOALS FOR JULY 1, 2025 – JUNE 30, 2026**

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- 1) Maintain “Standard Performer” designation under Public Housing Assessment System (PHAS) or replacement assessment program introduced by HUD. SCCHA is currently maintains a “Standard Performer” status based on assessments for FYE 6-30-24.
- 2) Reduce the number of vacancies in Private Mathison Manor (AMP 2) to 20 or less. This strategic reduction will not only enhance the overall occupancy levels.
- 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).
- 4) Achieve net gain of at least 50 HCVP participants under contract by end of calendar year 2026 and additional 25 by end of plan period (6/30/2026). The starting count of participants under contract is 2,090.
- 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) Broadening our collaborations within the community by engaging with social service organizations, healthcare partners, and various agencies specializing in trauma and conflict resolution. This initiative aims to deliver comprehensive services to participants of the Housing Choice Voucher Program and residents of public housing. The goal is to mitigate the frequency of incidents affecting these populations.
- 8) Comply with statutory and any HUD regulatory requirements to maintain site-based wait lists for public housing program.
- 9) Yearly mandated training 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.

- 10)** All employees of SCCHA are required to undergo annual training focused on compliance, customer service, and safety. This training is mandated to ensure that every staff member is well-versed in the necessary protocols and practices that uphold the organization's standards and regulatory requirements.
- 11)** Dispose 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.
- 12)** Complete the conversion of the public housing properties in O'Fallon and Lebanon, comprising 44 units, to Project-Based Vouchers or Project-Based Rental Assistance is scheduled for completion by the end of 2025.
- 13)** Submit RAD conversion application for Hawthorne Terrace in Alorton (44 family units) to Project-Based Vouchers.
- 14)** 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.
- 15)** 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.
- 16)** Effectively manage a Family Self-Sufficiency Program that caters to participants of the Housing Choice Voucher Program as well as residents of public housing, ensuring compliance with HUD's performance standards and sustaining a minimum enrollment of 25 participants necessary for the designation of a full-time FSS Program Coordinator.
- 17)** 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).



**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-II.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 HCVDP 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



**PART 1 - Policies Governing Eligibility, Selection, Admissions (including De-Concentration and Wait List Procedures)**

## **PHA PLAN ELEMENT – PART 1**

### **Policies Governing Eligibility, Selection, and Admissions (including De-concentration and Wait List Procedures)** [24 CFR Part 903.7 9 (c)]

#### **A. Public Housing**

##### **(1) Eligibility**

- a. SCCHA verifies eligibility for admission to public housing when families are “pulled” from the wait list (usually in groups of twenty-five or so) when there is an expectation of the need to fill an upcoming vacancy within the next 30 – 60 days.
- b. SCCHA uses the following non-income (screening) factors to establish eligibility for admission to public housing:
  - Criminal or Drug-related activity
  - Rental history
  - Housekeeping
  - Other (credit history, history of alcohol abuse, and prior experience in other subsidized housing programs).
- c. SCCHA requests criminal records from local law enforcement agencies for screening purposes.
- d. SCCHA does not request criminal records from State law enforcement agencies for screening purposes.
- e. SCCHA accesses FBI criminal records for screening purposes through an NCIC-authorized source.

##### **(2) Waiting List Organization**

- a. SCCHA utilizes a site-based wait list system for its public housing program. There are eighteen (18) separate locations. The system was approved by HUD July 1, 2003. Applicants may be on as many wait lists as they desire, provided they are eligible for the location (i.e. in accordance with elderly or non-elderly disabled designated locations and if the location has the appropriate unit size for the household).
- b. Persons interested in applying for admission to public housing may obtain an application at SCCHA’s main administrative office, development site management offices and on-line at the SCCHA website ([www.sccha.org](http://www.sccha.org)). Applications are accepted by personal delivery or mail. Upon request, reasonable accommodation will be granted to applicants with disabilities to ensure their ability to apply.

### **(3) Assignment**

- a. Applicant is ordinarily given one vacant unit choice before they fall to the bottom of or are removed from the waiting list unless there are extenuating circumstances. This policy is consistent across all waiting list types.

### **(4) Admissions Preferences**

- a. Income targeting:

SCCHA plans to exceed the federal targeting requirements by targeting more than 40% of all new admissions to public housing to families at or below 30% of median area income?

- b. Transfer policies:

Transfers take precedence over new admissions in the following circumstances:

- Emergencies
- Under-housed (in accordance with transfer policy)
- Medical justification
- Administrative reasons determined by the PHA (e.g., to permit modernization work)

- c. Preferences

In addition to date and time of application, SCCHA has established preferences for admission to public housing. SCCHA utilizes an Admission Selection Preference system, whereby the applicants with the most preference points are placed at the top of the wait list. Applicants with the same number of preference points are ranked in accordance with date and time of application. The admission selection preferences available include (*as last revised in the ACOP in 2023*):

- Working families and those who do not work because of age or disability (2 point preference)\*
- Veterans or their spouse or widow (1 point preference)
- Residents who live and/or work in the jurisdiction (10 point preference)
- Unmet housing need (1 point) \*\*
- Law enforcement officers and teachers (actively employed) [6 preference points]
- Self-sufficiency re-admission (10 preference points)
- Inter-program transfers (for accommodation purposes) [7 preference points]
- Local Disaster Victims (5 preference points)

- \*An applicant is eligible for a single two (2) point preference if they are employed, over the age of 62, or have a disability.
- \*\*To qualify for this preference the applicant must demonstrate an unmet housing need related to: a) rent burden (paying more than 50% of household income toward housing cost); b) overcrowded living conditions; c) substandard living conditions; d) displacement due to government action, natural disaster, foreclosure, and other verifiable circumstances; e) inability to afford independent housing resulting in the need to remain in the parent's home or the home of another family; f) homelessness or near homelessness (as defined by federal guidelines); g) residing in a shelter or transitional housing arrangement; h) other verifiable / documentable condition that substantiates an unmet housing need.

**NOTE: The waiting lists are organized first by points (i.e. those with the highest preference point total---typically 14 points for public housing), then by date/time of application for applicants with the same number of points. SCCHA reserves the right to select applicants from the wait list by income range when necessary to maintain a broad range of incomes at a particular location (as determined by the household income de-concentration analysis).**

#### **(5) Occupancy**

- a. Applicants and residents can use the following reference materials to obtain information about the rules of occupancy of public housing.
  - The PHA-resident lease.
  - The PHA's Admissions and (Continued) Occupancy Policy.
  - PHA briefing seminars or other written materials.
  - Orientation Video.
- b. Residents must notify the SCCHA of changes in family composition within thirty days of occurrence when a member has left the household or has joined the household through birth, adoption or court awarded custody. Other household additions must be approved by SCCHA in advance before the person establishes residency in the assisted unit.

#### **(6) De-concentration and Income Mixing**

- a. SCCHA's analysis of its family (general occupancy) developments (with one hundred or more units) determined that there was no need for measures to promote de-concentration of poverty or income mixing. See related exhibits at the end of this section. All developments fell within the adjusted income range of 85% to 115% of SCCHA-wide average household income. If the analysis for any particular year suggests the need for income de-concentration measures at any location, SCCHA shall pull higher or lower income applicant households as needed from the wait list to fill vacancies at that location until such time as the concentration is eliminated. SCCHA's Admissions and Continued Occupancy Policy contains the appropriate wait list administrative provisions.

## **B. Housing Choice Voucher Program**

### **(1) Eligibility**

- a. SCCHA verifies eligibility for participation in its Section 8 Housing Choice Voucher Program (HCVP) when families are “pulled” from the wait list (usually in groups of 50 or more) when there is an expectation of the need to issue additional vouchers within the next 60 to 90 days.
- b. SCCHA uses the following non-income (screening) factors to establish eligibility for admission to public housing.
  - Criminal or Drug-related activity more extensively than required by law or regulation.
  - Debt resulting from prior tenancy or participation in another federally assisted housing program.
- c. SCCHA requests criminal records from local law enforcement agencies for screening purposes.
- d. SCCHA does not request criminal records from State law enforcement agencies for screening purposes.
- e. SCCHA accesses FBI criminal records for screening purposes through an NCIC-authorized source.

### **(2) Waiting List Organization**

- a. SCCHA utilizes a separate wait list system for its Section 8 HCV Program. It is not combined or merged with any other list.
- b. Persons interested in applying for the Section 8 HCVP may obtain an application at SCCHA’s main administrative office, public housing development site management offices and on-line at the SCCHA website ([www.sccha.org](http://www.sccha.org)). Applications are accepted by personal delivery or mail. Upon request, reasonable accommodation will be granted to applicants with disabilities to ensure their ability to apply.

### **(3) Search Time**

- a. SCCHA currently provides all voucher holders with a 120-day search period, with extension granted only when there are extenuating circumstances.

#### **(4) Admissions Preferences**

##### a. Income targeting:

SCCHA will meet the federal targeting requirements by targeting at least 75% of all new admissions to the Section 8 HCVP to families at or below 30% of median area income?

##### b. Preferences

In addition to date and time of application, SCCHA has established preferences for admission to the Section 8 HCVP. SCCHA utilizes an Admission Selection Preference system, whereby the applicants with the most preference points are placed at the top of the wait list. Applicants with the same number of preference points are ranked in accordance to date and time of application. The admission selection preferences available include (*as last revised in Agency Plan Update 2012*):

- Working families and those unable to work because of age or disability (2 point preference)\*
- Veterans or their spouse or widow (1 point preference)
- Residents who live and/or work in the jurisdiction (10 point preference)
- Unmet Housing Need (1 preference point) \*\*
- Self-sufficiency re-admission (10 preference points)
- Insufficient Funding re-admission (10 preference points)
- Inter-program transfers (for accommodation purposes) [7 preference points]

\*An applicant is eligible for a single two (2) point preference if they are employed, age 62 or older or have a disability.

\*\* To qualify for this preference the applicant must demonstrate an unmet housing need related to: a) rent burden (paying more than 50% of household income toward housing cost); b) overcrowded living conditions; c) substandard living conditions; d) displacement due to government action, natural disaster, foreclosure, and other verifiable circumstances; e) inability to afford independent housing resulting in the need to remain in the parent's home or the home of another family; f) homelessness or near homelessness (as defined by federal guidelines); g) residing in a shelter or transitional housing arrangement; h) other verifiable / documentable condition that substantiates an unmet housing need.

**NOTE: The waiting list is organized first by points (i.e. those with the highest preference point total---typically 14 points for Section 8 HCVP), then by date/time of application for applicants with the same number of points. SCCHA reserves the right to select applicants from the wait list by income range when necessary to meet federally mandated admission requirements for families with household incomes equal to or less than 30% of median area income.**

**(5) Selection, Continued Participation, and Special Purpose Section 8 Assistance Programs**

- a. Applicants and participants can use the following reference materials to obtain information about the policies governing eligibility, selection, and admissions to any special-purpose Section 8 Program administered by the SCCHA;
  - Section 8 HCVP Administrative Plan
  - Briefing sessions, briefing packets or written material
  - Orientation Video
  
- b. SCCHA announces the availability of any special-purpose Section 8 programs to the public through published notices.

**PART 2 – Rent Determination Policies**



## **Rent Determination Policies**

[24 CFR Part 903.7 9 (d)]

### **A. Public Housing**

#### **(1) Income Based Rent Policies**

Income-based rents are set at the highest of 30% of adjusted monthly income, 10% of unadjusted monthly income, or minimum rent currently established at \$50 (less HUD mandatory deductions and exclusions). There is no “welfare rent” established in the State of Illinois.

The St. Clair County Housing Authority (SCCHA) has not adopted any discretionary minimum rent hardship exemption policies.

SCCHA has established a Flat Rent Schedule for each public housing development. Families paying Flat Rent may pay less than 30% of adjusted income toward monthly rent.

SCCHA does not employ any discretionary or optional deductions and/or exclusion policies in projecting adjusted annual income of households participating in the public housing program.

#### **(2) Ceiling Rents**

Ceiling rents are no longer employed by the SCCHA as part of its rent determination policies / procedures.

#### **(3) Interim Reporting Requirements**

Tenants must report changes in income or family composition between annual reexaminations when:

- There is any change in family composition;
- New or increase in any and all non-wage income source of \$200 or more monthly;
- New or increase in earned income source of \$200 or more monthly for households receiving a Utility Allowance Payment (UAP).

SCCHA does not offer individual saving accounts (ISAs) for residents as an alternative to the required 12 month disallowance of earned income and phasing in of rent increases.

#### **(4) Flat Rents**

In setting the market-based flat rents SCCHA utilized the following sources of information to establish comparability:

- The section 8 rent reasonableness study of comparable housing;
- Survey of rents listed in various media sources;
- Survey of similar unassisted units in the neighborhood;
- HUD's requirement to set the public housing flat rents at a minimum of 80% of the HUD established Fair Market Rents for the locality (SMFMRs are used).

## **B. Housing Choice Voucher Program (HCVP)**

### **(1) Payment Standards**

The payment standard is currently set at 100% of the HUD established Fair Market Rent for the areas. In April 2021 SCCHA adopted dual payment standards, one for all areas in St. Clair County except for zip codes 62269 (O'Fallon) and 62208 (Fairview Heights) and one exclusively for these two zip codes based upon high market demand (and higher rents) in these locations. The Smaller Area Fair Market Rents were used to establish the payment standards.

SCCHA considered the following when establishing the payment standard:

- Desire to maximize the number of families served with available funding, while ensuring payment standard is sufficient to achieve high level of successful voucher utilization among assisted families in the jurisdiction.
- Reflects market or submarket
- To increase housing options for families
- Due to high Utility Allowance Schedule (reduce tenant rent burden resulting from gross rent exceeding payment standard)

Payment standards are reevaluated for adequacy at least annually, but possibly more frequently depending upon budgetary and other programmatic factors.

SCCHA considers the following factors in its assessment of the adequacy of its payment standard:

- Success rates of assisted families
- Rent burdens of assisted families
- Budgetary constraints
- Utility allowance schedule

SCCHA is required by HUD to implement a Payment Standard Schedule based upon Small Area Fair Market Rents (SAFMRs) no later than January 1, 2025.

**(2) Minimum Rent**

SCCHA has established a \$50 monthly minimum rent for its Section 8 HCVP but has not adopted any discretionary minimum rent hardship exemption policies.

**PART 3 – Operation and Management**

## OPERATION AND MANAGEMENT

### **A. Management Structure of the St. Clair County Housing Authority**

For efficiency and effective management, SCCHA is organized into six functional departments: Administrative, Finance, Management (Public Housing), Maintenance; Modernization, and Housing Choice Voucher Program (HCVP). The Information Technology (IT) staff reports to the Executive Director. Procurement is considered an administrative function. Application Intake (for all programs) falls under the supervision of the Leasing Manager (i.e. Section 8), under the direction of the Program Director.

### **B. HUD Programs Under PHA Management**

The SCCHA administers the following federal programs. Also provided below is the number of families being served as of January 2, 2025 and estimated turnover for each program.

	Families Served	Projected Annual Turnover**
Public Housing	841 (1/2/2025)	@ 12.8%
HCVP	2,090 (1/2/2025)	@ 10.8%
Other *	47 (1/2/2025)	@ 9.8%

\*Includes Rural Development and Section 8 Projected Based Units

\*\*As calculated in the Statement of Housing Needs and Strategy for Addressing the Needs

### **C. Management and Maintenance Policies**

SCCHA has adopted the following public housing management and maintenance policy documents, manuals and /or handbooks or procedure statements that contain rules, standards, and policies that govern maintenance and management of public housing and governing Section 8 management.

#### **(1) Public Housing Maintenance and Management:**

- Admissions and Continued Occupancy Policy
- Ban & Bar Policy
- Blood Borne Disease Policy
- Capitalization Policy (includes Disposition Policy)
- Cell Phone Policy
- Check Signing Policy
- Civil Rights Certification
- Code of Conduct / Conflict of Interest Policy Statement
- Collection Policy

- Criminal Records Management Policy
- De-concentration Policy
- Demolition and/or Disposition Policy
- Disaster Recovery Plan (Electronic Media)
- Disaster Plan
- Drug Abuse Policy
- Drug Free Work-Place Policy
- Equal Housing Opportunities Policy
- Ethics Policy
- Facilities Use Policy
- Funds Transfer Policy
- Grievance Policy
- Hazardous Materials Policy
- Internal Control Policy
- Internet Use Policy
- Investment Policy (includes Internal Control Narrative)
- Maintenance Policy (includes Emergency Service Guidelines and Pest Infestation Control Policy)
- Natural Disaster Response Guidelines
- Oxygen Fire Safety Policy
- Personnel Policy (includes Drug Abuse Policy, Computer Internet Guidelines, Cellular Phone Usage Guidelines, and Travel Policy)
- Pet Policy
- Procurement Policy
- Records Retention Policy
- Re-housing Determination Policy (includes Fire Loss)
- Service Charge Policy
- Smoking Policy for Hi-Rise Buildings
- Transfer Policy
- Vehicle Use Policy
- Weapons Policy
- Work Order and Maintenance Service Procedures

(2) Section 8 HCVP Management:

- Administrative Plan
- Section 8 Procedures for Informal Review and Informal Hearing

**PART 4 – Grievance Procedures (Public Housing and Section 8 HCV Programs)**

**PHA PLAN ELEMENT --- PART 4  
ADMINISTRATIVE GRIEVANCE PROCEDURE  
PUBLIC HOUSING PROGRAM**

**I. DEFINITIONS**

**Complainant** is defined as any person who has the legal capacity to contract in the State of Illinois and is or has expressed a desire to be an applicant and/or resident of a public housing property operated by the St. Clair County Housing Authority (SCCHA) and believes his/her rights, duties, welfare, or status is or may be adversely affected by an action of the SCCHA or by a failure of the SCCHA to act and who files a grievance in the manner prescribed herein.

**Grievance** is defined as any dispute claimed to arise from an action of the SCCHA contrary to, or from a failure of the SCCHA to act in compliance with the applicable laws, policies, procedures, regulations, or contractual documents (i.e. lease agreement, etc.).

**General:** In hopes of settling disputed adverse decisions in the most-timely, informal and administratively efficient basis possible, SCCHA may elect to incorporate a “reconsideration” and “department director review” component in the review process as described below. It remains SCCHA’s sole discretion to incorporate either or both of these components in the review / appeal process, or to proceed directly to the federally required informal review (for applicants) or informal hearing (for tenants). The Executive Director (or designee) presides over informal reviews and/or hearings. Decision notices will be in writing and will include the applicable review directions.

**II. GRIEVANCE PROCESS**

Adverse decisions shall include notice of the complainant’s right to have the decision reviewed. Notices issued shall specify the level of review as either: A) a request for reconsideration to the person making the adverse decision; B) the Department Director; or C) the Executive Director.

**Step #1 – Request for Reconsideration.**

The first step in the grievance process, when so directed in the adverse decision determination, is for the complainant to notify the staff person who made the alleged adverse decision or who failed to act that the decision or failure to act is being disputed. The notification must be in written form, directed to the staff person responsible for the original decision or failure to act, and must be received within 10 calendar days of receipt of the decision notice or the failure to act.



Upon timely receipt of the reconsideration request the appropriate staff person shall review the decision and the complainant's basis for disputing the decision. If warranted, a meeting may be arranged to discuss the issues involved.

Within 10 business days of receipt of the reconsideration request or the date of the last meeting held with the complainant to discuss the disputed matter, the responsible staff person shall issue a written determination notifying the complainant of the results of the reconsideration.

The reconsideration notice shall notify the complainant of his/her right to further recourse under the terms of the Grievance Policy and shall identify the Departmental Director with jurisdiction over the matter.

#### Step #2 – Review by Departmental Director

If upon receipt of the reconsideration determination or as appropriate in accordance with the original adverse decision determination, the complainant believes the decision reached is inconsistent with applicable laws, policies, procedures, regulations, or contractual documents, the complainant may request a review of the decision by the appropriate Departmental Director. To obtain a review the complainant must submit a written request within 10 calendar days of receipt of the reconsideration determination.

It will be the responsibility of the appropriate Departmental Director to attempt to resolve the grievance in a manner consistent with all applicable laws, policies, procedures, regulations, and contractual documents.

The Department Director review meeting is conducted in an informal setting and shall at a minimum include a careful review of the circumstances that resulted in the adverse decision by staff. The complainant will be afforded the opportunity to respond to any and all issues influencing the adverse decision. The Department Director's review is not limited in scope to the reasons cited in the determination notice(s) issued related to the adverse decision. Rather, the Department Director review may include a comprehensive review of issues related to the eligibility and/or continued eligibility of the complainant. The Department Director's review decision may result in a determination to uphold, rescind and/or amend the original adverse decision and/or reasons therefore.

The Departmental Director will notify the complainant in writing of his/her decision and the reasons therefore within 10 business days of receipt of the grievance or the date of the last meeting held with the complainant in which the grievance was discussed. The complainant will also be advised in that notice of the opportunity to secure further review by the Executive Director if the complainant believes the decision reached is inconsistent with applicable laws, policy, procedures, regulations, contractual documents, etc.

If the Department Director issued the original adverse decision, the only review opportunity available to the complainant is before the Executive Director.

Step #3 – Review by Executive Director.

To obtain a review by the Executive Director, the complainant must submit a written request within 10 calendar days of receipt of the Departmental Director's decision.

The Executive Director shall arrange a meeting with the complainant and otherwise do what is necessary to resolve the matter in a manner consistent with applicable laws, policies, procedures, regulations, and contractual documents.

The complainant will be notified in writing of the SCCHA's final decision resulting from the Executive Director's review within 10 business days of receipt of the appeal or the date of the last meeting held with the complainant in which the grievance was discussed. The decision letter shall include a brief description of the factors considered in reaching the decision in addition to any other content specifically required by applicable federal regulation.

### **III. PROCEDURAL MATTERS**

- A. Written Notice of Proposed Adverse Action. SCCHA shall provide applicants and/or residents written notice of any proposed adverse action. The notice shall contain a specific statement that describes the proposed adverse action and the reasons therefore. In addition the notice shall inform the applicant and/or resident of the opportunity to have the decision reviewed under the terms of the established grievance policy.
- B. Timely Requests. Requests for a review hearing must be received within the time frames stated herein. SCCHA reserves the right to grant exceptions to the deadlines if it determines that an exception is justified by individual circumstances, but shall be under no obligation to grant an exception regardless of the circumstances involved.
- C. Payment of Rent as Condition for Hearing on Rent. SCCHA will not be required to consider, commence, or continue a grievance hearing unless the resident does the following:
  - 1. Pay the full amount of rent owed, as determined by SCCHA, except as described in the next paragraph;
  - 2. Continues to make such payments promptly during the grievance process.

These provisions do not apply to retro-rent charges which are the subject of the grievance.

If the grievance stems from a dispute over a proposed increase in the Tenant Rent amount as determined by SCCHA at rent review, SCCHA shall allow the complainant to pay the amount of the Tenant Rent in effect before the increase until completion of the grievance. If in such case, the original Tenant Rent determination proves correct; the increase shall take effect retroactively to the original proposed effective date.

Disputed retro-rent charges shall be held in abeyance (i.e. not charged to the resident account) until the grievance process has been concluded.

- D. Representation of Complainant. At his/her own expense, a complainant may be represented during the grievance process by a person of his/her choosing.
- E. Examination of Relevant Materials. The complainant has the right to examine and copy (at his/her expense) any relevant nonprivileged documents in the possession or control of SCCHA. This opportunity shall be given at the timely request of the complainant.
- F. Evidence. SCCHA and the complainant may present evidence, may question any witnesses, and have others make statements on their behalf at the hearing. Evidence shall be considered fairly, but strict judicial rules of evidence will not be applied.
- G. Effect of Grievance Proceedings on Evictions. If an SCCHA resident makes a timely request for a hearing on a proposed decision to terminate the tenancy or to evict the occupants, the lease shall not terminate nor shall the occupants be evicted before completion of the SCCHA grievance proceedings.
- H. Nonuse of Grievance Process. A complainant is not required to use the administrative grievance procedure for review of any SCCHA adverse action. The complainant has the right to use any otherwise available judicial procedure for review of all alleged adverse action by SCCHA.
- I. Accommodation of Person with Disabilities. SCCHA shall provide reasonable accommodation for persons with disabilities to allow participation in the grievance process.

Reasonable accommodation may include, but is not necessary limited to qualified sign language interpreters, readers, accessible locations, or attendants.

If the resident is visually impaired, any notice to the resident which is required under this policy shall be delivered in accessible format.

**IV. SECTION 504 DISCRIMINATION COMPLAINTS BY PERSONS WITH DISABILITIES**

Any person who feels he/she has been discriminated against on the basis of their handicap or disability in violation of the federal law entitled "Nondiscrimination Based on Handicap in Federally Assisted Programs and Activities", commonly referred to as Section 504, should file a complaint with the Administrative Director or other member of the Administrative Department.

Complaints should be written, unless the person filing the complaint has a handicap that would prohibit him/her from doing so. In such an instance, the complainant should make the cause of the complaint known to the Administrative Director in the most reasonable suitable method available.

The Administrative Director will attempt to informally resolve the complaint to the satisfaction of the complainant within 10 working days. If attempts at informal resolution are unsuccessful, a hearing before the Executive Director will be scheduled.

The complainant will be informed of the Executive Director's decision within 10 business days. The decision will be communicated to the complainant in a manner determined most appropriate, given the nature of the complainant's disability.

If the complainant remains dissatisfied, he/she retains the right to pursue the matter further through whatever judicial or administrative proceedings available under law.

**PLAN ELEMENT --- PART 4 (Continued)**  
**HOUSING CHOICE VOUCHER PROGRAM**  
**PROCEDURES FOR INFORMAL REVIEWS**  
**AND INFORMAL HEARINGS**

**A. GENERAL STATEMENT**

No applicant has a right or entitlement to be listed on the Section 8 rental assistance waiting list, to any particular position on the waiting list, or to admission to the program. However, all applicants have the right to bring a judicial action challenging a SCCHA decision as being a violation of a constitutional or statutory requirement.

**B. SUPERVISORY REVIEWS (FOR APPLICANTS AND PARTICIPANTS)**

To maximize administrative efficiencies and to promptly consider applicant and participant claims of improper adverse action, the SCCHA shall, at its discretion employ a supervisory review of adverse staff decisions. The supervisory review shall be conducted by a department director or other supervisor that did not make or approve the alleged adverse decision, or who is not a subordinate of such a person.

A supervisory review meeting is conducted in an informal setting and includes a careful review of the circumstances that resulted in the adverse decision by staff and provides the applicant/participant with the opportunity to respond to any and all issues influencing the adverse decision. The supervisory review is not limited in scope to the adverse decision. Rather, the supervisory review may include a comprehensive review of issues impacting the eligibility of an applicant and/or the right of continued participation of program participants. Supervisory review decisions are issued in writing within 10 business days of the meeting unless delayed by the receipt of information determined necessary to formulating and issuing a determination. A supervisory review may result in a determination to uphold, rescind, and/or amend the original adverse decision and/or reasons therefore. An applicant or participant may further appeal the supervisory review determination through the informal review or informal hearing process as outlined below. SCCHA may, at its discretion, omit the supervisory review process by moving directly to the informal review (for applicants) or informal hearing (for participants) process.

**C. INFORMAL REVIEWS (APPLICANTS)**

1. An applicant for Section 8 rental assistance has the right to an informal review in the following circumstances:
  - The applicant was found ineligible for the program and not placed on the waiting list
  - The applicant was removed from the waiting list for failing to follow the requirements
  - The applicant was refused a voucher
  - The applicant was denied a preference

2. An applicant for Section 8 rental assistance does not have the right to an informal review in the following circumstances:
  - To review discretionary administrative determinations by the SCCHA or to consider general policy issues or class grievances
  - To review the SCCHA's determination of the number of bedrooms entered on the voucher
  - To review the SCCHA's determination that the unit does not comply with HQS requirements
  - To review the SCCHA's determination not to approve a lease for a unit that does not comply with HQS or rent reasonableness requirements
  - To review the SCCHA's determination not to approve an extension or suspension of a certificate or voucher term
  - To review the SCCHA's determination that the unit is not in accordance with HQS because of family size or composition.
3. The Applicant has the right to examine and to receive copies of (at one's own expense) any information related to the decision to deny assistance.
4. The informal review must be requested in writing by the applicant within 10 business days of the SCCHA's notification of the action. The written request must contain the following:
  - The action or actions taken by the SCCHA for which the review is requested
  - The reason(s) why the applicant feels the action(s) was (were) improper or incorrect
  - Whether the applicant wishes to have a pre-review meeting with the SCCHA to present oral objections to the decision. If the applicant does not specifically indicate the desire for a personal meeting, the SCCHA shall assume that such a meeting is not being requested.
5. The informal review shall be conducted as follows:
  - Except for matters relating to the denial of a preference, the informal review shall be presided over by a person designated by the SCCHA who did not make or approve the decision to deny assistance, or who is not a subordinate of such a person.
  - The informal review will be scheduled within 10 business days of the receipt of the applicant's request. The applicant shall be notified in writing of the date, time, and place of the review.
  - The applicant shall have the opportunity to present oral and written evidence at the review. A maximum of three witnesses will be allowed to present evidence on behalf of the applicant.
6. Following the informal review, the applicant shall be notified in writing of the decision of the SCCHA. The decision will be mailed to the applicant within 10 business days following the date of the review.

7. Any correspondence by the SCCHA to an applicant that communicates a decision which is subject to an informal review shall contain a statement that such a right for an informal review is available and the procedures for exercising one's right.

#### **D. INFORMAL HEARINGS (PARTICIPANTS)**

1. A participant, as defined, has the right to request an informal hearing solely for the purpose of determining whether or not a decision to terminate assistance was in compliance with HUD regulations and SCCHA's policies.
2. Any notification to a participant that terminates assistance will be in writing, and will contain a statement that the participant has the right to request an informal hearing and the deadline for requesting it.
3. The request for an informal hearing must be in writing and must be received by the SCCHA within 10 business days of the date of the notification of termination.
4. The participant has the right to examine and to receive copies of (at one's own expense) any information related to the decision to terminate assistance.
5. The informal hearing will be conducted as follows:
  - The SCCHA will schedule the informal hearing at a mutually convenient time provided that the informal hearing must occur within 30 days of the SCCHA's receipt of the participant's request.
  - The informal hearing shall be presided over by a person designated by the SCCHA who did not make or approve the decision to terminate assistance or who is not a subordinate of such a person.
  - The participant may retain legal counsel or another representative at one's own expense. A maximum of three witnesses may be called by each side.
6. At the informal hearing, the participant will be given an opportunity to examine evidence and question witnesses, as well as present testimony and evidence in his or her favor. Evidence will be considered without regard to admissibility under rules of evidence applicable to judicial proceedings.
7. During the informal hearing, the hearing officer may participate in questioning witnesses and may take steps, as necessary, to ensure the hearing is conducted in a civil manner. The hearing officer may also recess or continue the proceedings as necessary to ensure that all pertinent information is presented, while considering the need to reach a decision expeditiously.
8. Failure of the participant to appear at the hearing, without giving prior notice, shall constitute a waiver of the participant's right to an informal hearing and shall result in a decision to uphold the decision terminating assistance.
9. The SCCHA will notify the participant, in writing, of its decision within 10 business days of the conclusion of the informal hearing. The notification will state the regulatory and/or other grounds for making the decision.

## **E. WHEN A HEARING IS NOT REQUIRED**

The SCCHA will not provide a participant family an opportunity for an informal hearing for any of the following reasons:

- Discretionary administrative determinations by the SCCHA
- General policy issues or class grievances
- Establishment of the SCCHA's schedule of utility allowances for families in the program
- A SCCHA's determination not to approve an extension or suspension of a voucher term
- A SCCHA's determination not to approve a unit or lease
- A SCCHA's determination that an assisted unit is not in compliance with HQS (However, SCCHA will provide the opportunity for an informal hearing for a decision to terminate assistance for a breach of the HQS caused by the family.)
- A SCCHA's determination that the unit is not in accordance with HQS because of the family size
- A determination by the SCCHA exercise or not exercise any right or remedy against the owner under a HAP contract

## **F. DENIALS OR TERMINATIONS RELATED TO DRUG-RELATED CRIMINAL ACTIVITY OR VIOLENT CRIMINAL ACTIVITY**

1. Assistance may be denied or terminated based on drug-related criminal activity if the preponderance of evidence indicates that a family member has engaged in such activity, regardless of whether or not the family member has been arrested or convicted.
2. Discretion shall be used in considering all of the circumstances in each case, including the seriousness of the offense, the extent of participation by family members, and the effect that denial or termination of assistance would have on family members not involved in the criminal activity. Remaining members of the family may be permitted, in certain cases, to continue receiving assistance under the condition that family members who it has been determined engaged in the criminal activity will not reside in the unit. Also, a family member who has engaged in the use of drugs may be required to submit evidence of successful completion of a treatment program as a condition of continued assistance.



## **G. EFFECT OF THE DECISION**

SCCHA is not bound by a hearing decision:

- Concerning a matter for which the Authority is not required to provide an opportunity for an informal hearing under this section, or that otherwise exceeds the authority of the person conducting the hearing under the SCCHA hearing procedures.
- Contrary to HUD regulations or requirements, or otherwise contrary to federal, state, or local law.
- If the SCCHA determines that it is not bound by a hearing decision, SCCHA will notify the family within 14 calendar days of the determination and of the reasons for the determination.

**PART 5 – Designated Housing for Elderly and Disabled Families**



# ST. CLAIR COUNTY HOUSING AUTHORITY

1790 SOUTH 74TH STREET  
(618) 277-3290  
www.sccha.org

BELLEVILLE, ILLINOIS 62223  
FAX (618) 277-1806  
sccha@sccha.org  
TDD: 1-800-545-1833, ext. 933

March 27, 2024

Mr. William O. Dawson III, Director  
Illinois State Office of Public Housing, Region V  
U.S. Department of Housing & Urban Development  
Illinois State Office-Room 2401  
Ralph H. Metcalfe Federal Building  
77 West Jackson Boulevard  
Chicago, IL 60604-3504

Attn: Pam Kosuth,  
Public Housing Division

RE: Renewal of Designated Housing Plan

Dear Mr. Dawson:

The St. Clair County Housing Authority is requesting a two-year renewal effective May 1, 2024 of our Designated Housing Plan and attesting that the statutory requirements of the original plan are being met and there are no unanticipated adverse impacts on the housing resources for groups not being served due to this designation. The specific developments and designations are summarized below.

Development Name	Development Number	# of Units Designated		Total Public Housing Units	% of Development designated	Population Designated
		1-BR	2-BR			
Bel-Plaza I, II	IL 30-16/61	86		86	100%	86 - Elderly Only
Swansea	IL 30-18	16		16	100%	16 - Elderly Only
New Athens	IL 30-21	16		16	100%	16 - Elderly Only
Amber Court	IL 30-27	60	4	64	100%	64 - Elderly Only
New Athens	IL 30-13	4		16	25%	4 -Non-Elderly Disabled Only
Lebanon	IL 30-14	4		24	17%	4 -Non-Elderly Disabled Only
Washington Park	IL 30-17	20		32	63%	20 -Non-Elderly Disabled Only
Lenzberg	IL 30-19	4		8	50%	4 -Non-Elderly Disabled Only
<b>TOTAL</b>		<b>209</b>	<b>4</b>	<b>262</b>		
<b>TOTAL PH UNITS IN INVENTORY</b>				<b>949</b>	<b>22%</b>	

## "EQUAL HOUSING OPPORTUNITY"

**EXECUTIVE DIRECTOR**

Vera Jones



**ATTORNEYS**

Philip Rice  
Kevin Kaufhold

**COMMISSIONERS**

Daniel Barger  
Sr. Julia Huiskamp

Herbert Simmons

Stephanie S. Belt  
Jacqueline Johnson

Mr. Dawson  
March 27, 2024  
Page 2

For your convenience and reference, a copy of the extension granted by your office effective May 1, 2022 is enclosed.

Should your staff have any questions or need any additional information, please contact me at 618-277-6960.

Sincerely,

Larry McLean  
Executive Director

Enclosure (1)

cc: Vera Jones, Executive Director Designate  
Tracy Jones, Director of Asset Management

**PART 6 – Community Service and Self-Sufficiency**

## Community Service and Self-Sufficiency Program

[24 CFR Part 903.7 9 (l)]

### **A. PHA Coordination with the Welfare (TANF) Agency**

The St. Clair County Housing Authority (SCCHA) has entered into a cooperative agreement with the TANF Agency, Illinois Department of Human Services (IDHS) to share information and/or target supportive services (as contemplated by section 12(d)(7) of the Housing Act of 1937). The agreement was signed June 6, 1996.

Other coordination efforts between SCCHA and IDHS include, but are not necessarily limited to:

- Client referrals
- Information sharing regarding mutual clients (for rent determinations and other purposes)

SCCHA employs the following discretionary policies to enhance the economic and social self-sufficiency of assisted families:

- Public housing admissions and rent determination policies
- Housing Choice Voucher Program (HCVP) admissions and rent determination policies

SCCHA coordinates, promotes or provides the following programs to enhance the economic and social self-sufficiency of residents:

- Family Resource Centers in the two Cahokia Heights developments (Ernest Smith Sr. Apartments and Private Mathison Manor). The FRCs offer Information and Referral services and periodic workshops for adults.

SCCHA is complying with the statutory requirements of section 12(d) of the U.S. Housing Act of 1937 (relating to the treatment of income changes resulting from welfare program requirements) by:

- Adopting appropriate changes to the PHA's public housing rent determination policies and training staff to carry out those policies
- Informing residents of policy on admission and reexamination
- Establishing or pursuing a cooperative agreement with all appropriate TANF agencies regarding the exchange of information and coordination of services.

With the merger of the Housing Choice Voucher Programs of the East St. Louis Housing Authority (ESLHA) and SCCHA effective October 1, 2013, with SCCHA serving as the administering entity, SCCHA also assumed administrative responsibilities for the Family Self-Sufficiency Program. SCCHA applied for and received a renewal grant for the

HCVP FSS program coordinator in 2014, 2015 and 2016. The 2015 and 2016 grants were for a part-time coordinator based upon number of participants under contract being less than the minimum of 25 (needed for a full-time coordinator) as of the date specified by HUD. SCCHA applied for and received a 2017 renewal grant with funding sufficient for a full-time Program Coordinator. SCCHA has taken advantage of the regulatory change that allows a single FSS program to serve both Section 8 HCVP participants and public housing residents. SCCHA applied for and received renewal grants in 2018, 2019, 2020, 2021, 2022, 2023, and 2024 (which had a two-year grant term funding the program coordinator through 2025).

**PART 7 – Safety and Crime Prevention**



## **PHA PLAN ELEMENT – PART 7**

### **Safety and Crime Prevention Measures**

[24 CFR Part 903.7 9 (m)]

#### **A. Need for measures to ensure the safety of public housing residents.**

1. Description of the need for measures to ensure the safety of public housing residents.
  - High incidence of violent and/or drug-related crime in some or all of the SCCHA's developments.
  - High incidence of violent and/or drug-related crime in the areas surrounding or adjacent to the SCCHA's developments.
  - Residents fearful for their safety and/or the safety of their children.
  - Observed lower-level crime, vandalism and/or graffiti.
  - People on waiting list unwilling to move into one or more developments due to perceived and/or actual levels of violent and/or drug-related crime/
2. Information or data SCCHA used to determine the need for actions to improve safety of residents.
  - Safety and security survey of residents.
  - Analysis of crime statistics over time for crimes committed “in and around” public housing properties.
  - Resident reports.
  - PHA employee reports.
  - Police reports.
3. The following developments are most impacted.

Ernest Smith Sr. – IL30-06A and 20 (Centreville neighborhood of Cahokia Heights).  
Private Mathison Manor – IL30-06B, 08B, and 10 (Centreville neighborhood).  
Hawthorne Terrace – IL30-011 (Alorton neighborhood of Cahokia Heights).  
Thomas Terry Apartments – IL30-01, 09, 012 (Brooklyn).  
Washington Park – IL30-17.

#### **B. Crime and Drug Prevention activities the SCCHA has undertaken or plans to undertake in the next PHA fiscal year:**

1. Crime prevention activities the SCCHA has undertaken or plans to undertake.
  - Contracting with outside and/or resident organizations for the provision of crime- and/or drug-prevention activities.
  - Activities targeted to at-risk youth, adults, or seniors.
2. The developments located in the Centreville neighborhood (of Cahokia Heights) are most affected by the Crime and Drug Prevention activities.

#### **C. Coordination between SCCHA and the police**

1. Coordination between the SCCHA and the appropriate police departments for carrying out crime prevention measures and activities include.

- Police provide crime data to housing authority staff for analysis and action.
- Police have established a physical presence on housing authority property (e.g., community policing program, officer in residence).
- Police regularly testify in and otherwise support eviction cases.
- Police regularly meet with the PHA management and residents.

2. The public housing developments in the Centreville neighborhood of Cahokia Heights are most affected by the activities described above.

#### **D. Submission of Emergency Security Grant Application**

1. SCCHA applied for and received an Emergency Security Grant through HUD in 2010 that provided for the addition of surveillance cameras at the public housing properties in O'Fallon, Brooklyn and Belleville (IL030-027) and the upgrade and expansion of existing surveillance cameras at the Bel-Plaza 1 & 2 Buildings in Belleville. SCCHA applied for this grant again in 2014, targeting expansion of surveillance cameras at the Centreville public housing properties (Ernest Smith Sr. Apts. and Private Mathison Manor, exclusive of development #IL030-010). SCCHA's application was determined eligible for funding but was not selected in the random lottery. Thirteen housing authorities received security grant awards in 2014 out of more than 300 applicants. SCCHA also applied for the emergency security grant in 2015 and 2016, targeting the Private Mathison Manor development (the #IL030-010 portion of the property) because of the long-term physical viability study planned for the 30-08 portion of the Centreville properties. SCCHA applied for the ES grant in 2017 and 2018 targeting expansion of the video surveillance camera system at the Bel-Plaza 1 & 2 Senior Buildings in Belleville. The ES grant application in 2019 targeted the Amber Court property; a senior citizen designated development located in Belleville. SCCHA's grant applications in 2015, 2016, 2017, 2018 were all determined eligible for funding, but were not one of the few PHAs randomly selected by lottery from among the hundreds that applied. SCCHA also applied in 2019 (again targeting security improvements for Amber Court) but the application was determined by HUD not to meet the "emergency" definition and was excluded from the random lottery. In 2020 SCCHA received notification excess funds were available from the 2019 and 2018 allocations and SCCHA's 2018 application was randomly selected for funding. That work has been completed. SCCHA did not apply for funding in 2020, 2021, 2022 and 2023 because the current crime data to support the need (and eligibility determinations) was not available from local law enforcement. However, SCCHA is seeking funding through the CFP emergency safety and security grants for the year 2025. If awarded, these funds will be allocated to improve the security measures at Pvt. Mathison Manor. Planned enhancements include the installation of fiber optic cables to ensure more reliable Wi-Fi connectivity, the addition of night vision cameras for improved surveillance capabilities, the implementation of speed bumps to reduce vehicular speeds, and necessary repairs to existing security infrastructure. Collaborating with two local police departments, we were able to obtain relevant crime data from law enforcement to substantiate our application, demonstrating that the crime rates in the vicinity of the development meet the emergency criteria outlined in the Notice of Funding Availability (NOFA). This collaboration is part of a broader interagency agreement aimed at supporting the community by addressing crime and providing resources for families, including trauma support and conflict resolution training.

**PART 8 – Pet Policy (Public Housing Program)**

## ST. CLAIR COUNTY HOUSING AUTHORITY'S

### PET OWNERSHIP POLICY

#### Purpose

The purpose of this policy is to establish rules governing the ownership of common household pets in and on properties owned and operated by The St. Clair County Housing Authority (SCCHA). In accordance with federal regulations, this policy does not apply to animals that assist, support or provide service to persons with disabilities.

#### Types and Number of Pets

Common Household Pets include domesticated animals that are traditionally kept in the home for pleasure, as opposed to commercial purposes. Such pets would include dogs, cats, birds, fish, caged rodents such as hamsters or gerbils, and small reptiles such as turtles. Livestock, reptiles more than 12 inches in length, and pigs are not considered to be common household pets.

One pet per unit will be allowed. Multiple fish or small reptiles in one aquarium will be classified as one pet. Rodents will be limited to 2 per cage. No breeding stock will be allowed.

The adult weight of dogs and cats may not exceed 25 pounds. The adult height of dogs and cats may not exceed 24 inches.

Specific breeds or species of animals that are deemed potentially harmful to the health or safety of others will not be permitted. This includes attack and fight trained dogs.

All dogs and cats must be spayed or neutered.

#### Approval/Registration of Pets

All dogs/cats must be approved by and registered with the Housing Authority prior to being brought onto the premises. Approval is to be obtained by completing the Authorization for Pet Ownership form. A color picture of the dog/cats must be provided to the Housing Authority for identification purposes.

To assist in identifying units with dog/cats, a sticker will be placed on the front door of all units that have pets registered with the Housing Authority.

Residents must notify management in writing of their intent to house other pets (i.e. birds, fish, rodents, reptiles) prior to bringing the pet on the premises. Management reserves the right to reasonably refuse, restrict, and/or charge a security deposit for housing a pet other than a dog/cat, when the circumstance warrant (i.e. increase potential for property damage, resident safety, etc.).

### **Pet Fees/Security Deposits**

Upon approval of a dog/cat or other pet as applicable by the Housing Authority, the resident shall be required to pay a monthly fee of \$10, due with each month's rent payment. A refundable pet deposit of \$200 is required. The \$10 monthly fee is for general costs to the Housing Authority associated with the presence of pets. The refundable deposit is to cover the costs attributed to damage caused by specific pets. The \$10 monthly fee is not applicable to residents residing in properties designated for particular populations (i.e. elderly / disabled or mixed populations, senior citizen only, and/or non-senior person with a disability only occupancy designation). The refundable deposit is to cover the costs attributed to damage caused by specific pets. Once paid, pet deposits are refundable only upon the resident vacating the apartment (i.e. not upon removal of the animal.)

### **Restrictions and Prohibitions**

Due to issues related to congestion, only residents residing in single-family or duplex units are permitted to have a dog or cat, except for locations designated for the elderly and/or persons with disabilities. Also due to issues related to congestion, logistics, lack of green space, noise and other factors, senior / disabled residents residing in high-density developments are prohibited from a have a dog. High-density is defined as a hi-rise building (i.e. those having four or more floors).

### **Conditions of Pet Ownership**

Residents are responsible for any damage caused by their pets, including cleaning or fumigating their units, the cost of which will be deducted from the refundable pet deposit. Residents are also responsible for the behavior of their pets, assume full liability for their pets, and agree to hold harmless the Housing Authority from any claims caused by an action or inaction of their pets.

If a pet causes harm to any person, the owner will be required to notify the Housing Authority and permanently remove the pet from the premises within 24 hours of written notice from the Housing Authority.

Pets may not be left unattended in the dwelling unit for more than 12 hours. If the pet is left unattended with no arrangements for alternate care, the housing authority will contact the local pet control authority to assume control of the animal. Any expenses incurred will be the responsibility of the owner.

Should the pet owner become unable to care for their pet for any reason, the name, address and phone number of at least one alternate caretaker for the pet shall be provided to the Housing Authority. In the event the alternate caregiver is unwilling or unable to care for the pet, the local pet control authorities will be contacted to assume control of the animal until such time as another friend or family member is contacted to assume responsibility of the pet owner.

All pets will be properly licensed and inoculated as prescribed by state and/or local ordinances. A certification signed by a licensed veterinarian or state or local official will be required to attest to such licensing and inoculations. The certification shall be updated at least annually, or as required by state and/or local ordinances. Required tags shall be visible on the animal at all times.

Pet owners are required to take appropriate measures to keep pets free of fleas and ticks. Any pet-related insect infestation in the dwelling units will be the responsibility of the pet owner. The Housing Authority reserves the right to perform insect extermination at the expense of the pet owner.

Pet owners must maintain the pet and its quarters in a manner that will prevent odors and unsanitary conditions.

Pets are expected to be quiet so as not to disturb any other residents of the Housing Authority or other neighbors.

All pets must be kept in the owner's unit and must be controlled / contained when Housing Authority employees, its agents or others must enter the unit to conduct business. Pets must be leashed and attended to by an adult at all times when outside. Pets may not be chained or tethered unattended while outside. No alterations may be made to the dwelling or the dwelling area to create an enclosure for a pet. No outdoor cages or pet homes may be constructed, unless management issues written authorization for a resident living in a single-family home.

Pet owners must clean up pet waste and are responsible for prompt and proper disposal of waste. Cats must use waterproof litter boxes inside the unit and litter boxes will be emptied and cleaned in a timely manner. Litter shall be disposed of appropriately. No litter will be flushed down the toilet.

### **Visiting Pets/Stray Animals**

Tenants are prohibited from feeding or harboring stray animals. Feeding or harboring stray animals or having a visiting pet on the premises will be construed as owning a pet without proper authorization of the Housing Authority.

### **Violations of Pet Ownership Policy**

Violation of any part of this policy may result in:

(1). Required removal of pet within 10 days of written notice from the Housing Authority, except in the case of the pet causing harm to a person, when the removal is required within 24 hours of written notice from the Housing Authority,

and/or

(2). Eviction.

### **Management's Right to Refuse/Deny**

Management reserves the right to refuse/deny a resident's request for a pet when there are previously documented concerns regarding the resident's ability to meet health and safety standards established by the lease agreement.

### **Resident's Right to Appeal**

Decisions made by Management in administering the Pet Policy are grievable by residents under the Housing Authority's Grievance Policy. Management will notify the resident of the right to grieve when issuing adverse decisions.

Msword.forms/pet policy.doc

**PART 9 – Smoke-Free Public Housing Policy**



**Smoke-Free Public Housing Policy  
St. Clair County Housing Authority**

**Purpose of No-Smoking Policy**

1. To mitigate the irritation and known health effects of secondhand smoke.
2. Minimize the maintenance, cleaning and redecorating costs associated with smoking.
3. Decrease the risk of smoking-related fires to property and personal safety.

**Scope / Implementation / Effective Date**

Implementation of the "Smoke Free" Public Housing policy shall be in all federally-assisted properties operated by the St. Clair County Housing Authority (SCCHA), including:

- All "Public Housing" or Low Rent Housing Program locations (See Exhibit 1)
- Both "Multi-family" housing properties (known as Gwendolene Court in Belleville and Townhouse Court in Brooklyn)
- The Rural Development Property known as Cedar Ridge in Lebanon.

The Smoke Free Policy / lease addendum shall be effective July 1, 2018. The July 1, 2018 effective date applies to all residents at all locations. There is no "grandfather" or other exemption from the policy. Residents were given more than one year notice of the SCCHA's intent to declare all its federally-assisted properties as "Smoke Free" effective July 1, 2018. Notice was first given in conjunction with the 2017 Agency Plan Update process. Residents were periodically reminded of the July 1, 2018 effective date through-out 2017 and the early part of 2018.

**"Smoke Free" Areas**

Smoking is not permitted in any interior area of any SCCHA operated buildings, including but not necessarily limited to all offices, maintenance shops, individual apartments and all interior common areas, and within twenty-five feet (25') of any exterior doorway or operable window.

The smoking ban includes all "prohibited tobacco products." Prohibited tobacco products is defined to include lit cigar, cigarette, pipe or other similar tobacco product in any manner or in any form, including the use of water-pipes (commonly known as "hookas").

**Those affected by the no-smoking policy**

This policy applies to everyone --- including residents, guests, visitors, service personnel and SCCHA employees ---who visit, live and/or perform work on SCCHA property, including SCCHA-owned vehicles.

The "Smoke Free" Policy **does not** mean that residents or employees will have to quit smoking in order to live or work at SCCHA operated properties. The new policy will only prohibit smoking (as defined) in the "non-smoking areas" on all SCCHA-operated properties.

Board Approved 4/12/17

### **Proper Disposal of Cigarette Butts & Smoking Material**

Cigarette butts and all smoking material must be disposed of in a neat and safe manner. No person may throw cigarette butts or other smoking material on the ground.

### **“Smoke Free” Signage**

SCCHA shall post “no smoking” or “smoke free” signs at its discretion.

### **Lease Addendum**

Residents will be required to sign a lease addendum that specifies smoking will be prohibited inside all apartment units, indoor common areas, and within twenty-five (25) feet from any entrance / exit / operable window. The “Smoke Free” policy is not a property wide ban on smoking, only focusing on indoor smoking practices and within 25 feet of any doorway or operable window.

### **Cessation Education**

To assist all residents and employees with the “Smoke Free” policy transition and to accommodate resident interest in smoking cessation, SCCHA will make information regarding cessation education materials and services through the St. Clair County Public Health Department and/or other sources available to residents.

### **Compliance / Enforcement**

The resident (leaseholder) is responsible for the actions of all other household members, live-in aides, guests, visitors and others on the property as a result of their occupancy. Failure to comply with any of the provisions of this policy shall be considered a material lease violation and shall subject the resident to all leasehold remedies available to management, including, but not limited to lease termination, eviction, and charges for damages which may include the cost to clean or replace items discolored and/or which contain the odor of smoke including, but not limited to carpets, window coverings, walls, or the cost to repair burn marks and remove cigarette butts or residue.

Enforcement issues involving SCCHA employees shall be handled in a manner prescribed by the SCCHA Personnel Policy, namely through a progressive disciplinary process.

Resident violation of the provisions of this policy shall generally be handled as follows:

- 1<sup>st</sup> – Infraction – Verbal Warning
- 2<sup>nd</sup> – Infraction – Written Warning
- Additional – Infractions – Service Fee of \$25.00 each

Repeated violation shall be considered, in the accumulative sense, a material violation of the lease. As such, lease termination action shall be ensued.

Board Approved 4/12/17

**Complaints / Investigations**

If a resident (or other party) witnesses someone smoking or smells tobacco smoke in any place within the interior of any SCCHA operated property or witnesses someone smoking in non-smoking areas, he / she should report the violation or the odor to the Property Manager in writing as soon as possible. In the case of non-compliance by a SCCHA employee, reports should be made to the SCCHA's Administrative Director, at 618-277-3290, extension 6980.

Property Managers or other members of SCCHA's management or administrative staff receiving a complaint will seek to identify the specific source of the tobacco smoke and will take appropriate enforcement action.