

St. Clair County Housing Authority's

2013 Agency Plan Update

February 18, 2013

PHA 5-Year and Annual Plan	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires 8/30/2011
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1.0	PHA Information PHA Name: <u>St. Clair County Housing Authority</u> PHA Code: <u>IL030</u> PHA Type: <input type="checkbox"/> Small <input type="checkbox"/> High Performing <input checked="" type="checkbox"/> Standard <input type="checkbox"/> HCV (Section 8) PHA Fiscal Year Beginning: (MM/YYYY): <u>7/1/2013</u>																										
2.0	Inventory (based on ACC units at time of FY beginning in 1.0 above) Number of PH units: 1002 Number of HCV units: 1909 (ACC Authority)																										
3.0	Submission Type <input type="checkbox"/> 5-Year and Annual Plan <input checked="" type="checkbox"/> Annual Plan Only <input type="checkbox"/> 5-Year Plan Only																										
4.0	PHA Consortia <input type="checkbox"/> PHA Consortia: (Check box if submitting a joint Plan and complete table below.)																										
	<table border="1"> <thead> <tr> <th rowspan="2">Participating PHAs</th> <th rowspan="2">PHA Code</th> <th rowspan="2">Program(s) Included in the Consortia</th> <th rowspan="2">Programs Not in the Consortia</th> <th colspan="2">No. of Units in Each Program</th> </tr> <tr> <th>PH</th> <th>HCV</th> </tr> </thead> <tbody> <tr> <td>PHA 1:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>PHA 2:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>PHA 3:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) Included in the Consortia	Programs Not in the Consortia	No. of Units in Each Program		PH	HCV	PHA 1:						PHA 2:						PHA 3:					
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5.0	5-Year Plan. Complete items 5.1 and 5.2 only at 5-Year Plan update.																										
5.1	Mission. State the PHA's Mission for serving the needs of low-income, very low-income, and extremely low income families in the PHA's jurisdiction for the next five years N/A --- 2011 ANNUAL UPDATE ONLY																										
5.2	Goals and Objectives. Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low-income and very low-income, and extremely low-income families for the next five years. Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan. N/A --- 2011 ANNUAL UPDATE ONLY																										
6.0	PHA Plan Update (a) Identify all PHA Plan elements that have been revised by the PHA since its last Annual Plan submission: <p style="text-align: center;">Proposed revisions in PHA Plan elements are contained in Attachment #6</p> (b) Identify the specific location(s) where the public may obtain copies of the 5-Year and Annual P11A Plan. <p style="text-align: center;">SCCHA Main Office, 1790 South 74th St., Belleville, IL 62223 On-line @ SCCHA website www.sccha.org</p> (c) A copy of the 5 Year and Annual PHA Plan is posted and available for review at the following Site Management Offices: <p style="text-align: center;">511 South 6th St., Brooklyn (Thomas Terry Apartments) 610 South 66th St., Centreville (Private Mathison Manor) 4731 Tudor, Centreville (Ernest Smith Sr. Apartments)</p>																										
7.0	Hope VI, Mixed Finance Modernization or Development, Demolition and/or Disposition, Conversion of Public Housing, Homeownership Programs, and Project-based Vouchers. See Attachment #7																										
8.0	Capital Improvements. Please complete Parts 8.1 through 8.3, as applicable.																										
8.1	Capital Fund Program Annual Statement/Performance and Evaluation Report. As part of the PHA 5-Year and Annual Plan, annually complete and submit the <i>Capital Fund Program Annual Statement/Performance and Evaluation Report</i> , form HUD-50075.1, for each current and open CFP grant and CFFP financing. <p style="text-align: center;">See Attachment #8.1</p>																										
8.2	Capital Fund Program Five-Year Action Plan. As part of the submission of the Annual Plan, PHAs must complete and submit the <i>Capital Fund Program Five-Year Action Plan</i> , form HUD-50075.2, and subsequent annual updates (on a rolling basis, e.g., drop current year, and add latest year for a five year period). Large capital items must be included in the Five-Year Action Plan. <p style="text-align: center;">See Attachment #8.2</p>																										

8.3	<p>Capital Fund Financing Program (CFFP). <input type="checkbox"/> Check if the PHA proposes to use any portion of its Capital Fund Program (CFP)/Replacement Housing Factor (RHF) to repay debt incurred to finance capital improvements.</p> <p style="text-align: center;">SCCHA does not propose to use any portion of its CFP to pay debt incurred to finance capital improvements</p>
9.0	<p>Housing Needs. Based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data, make a reasonable effort to identify the housing needs of the low-income, very low-income, and extremely low-income families who reside in the jurisdiction served by the PHA, including elderly families, families with disabilities, and households of various races and ethnic groups, and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location.</p> <p style="text-align: center;">See Attachment #9</p>
9.1	<p>Strategy for Addressing Housing Needs. Provide a brief description of the PHA's strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year. Note: Small, Section 8 only, and High Performing PHAs complete only for Annual Plan submission with the 5-Year Plan.</p> <p style="text-align: center;">See Attachment #9.1</p>
10.0	<p>Additional Information. Describe the following, as well as any additional information HUD has requested.</p> <p>(a) Progress in Meeting Mission and Goals. Provide a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year Plan.</p> <p style="text-align: center;">See Attachment #10</p> <p>(b) Significant Amendment and Substantial Deviation/Modification. Provide the PHA's definition of "significant amendment" and "substantial deviation/modification"</p> <p>The St. Clair County Housing Authority (SCCHA) establishes the following criteria for substantial deviations and significant amendments to its Agency Plan:</p> <ul style="list-style-type: none"> • Changes to rent or admissions policies or organization of the waiting list; • Additions of non-emergency work items (items not included in the current Annual Statement or five-Year Action Plan) or change in the use of replacement reserve funds under the Capital Fund; • Any change with regard to demolition or disposition, designation, homeownership programs or conversion activities.
11.0	<p>Required Submission for HUD Field Office Review. In addition to the PHA Plan template (HUD-50075), PHAs must submit the following documents. Items (a) through (g) may be submitted with signature by mail or electronically with scanned signatures, but electronic submission is encouraged. Items (h) through (i) must be attached electronically with the PHA Plan. Note: Faxed copies of these documents will not be accepted by the Field Office.</p> <p>(a) Form HUD-50077, <i>PHA Certifications of Compliance with the PHA Plans and Related Regulations</i> (which includes all certifications relating to Civil Rights) - See Attachment #11-A</p> <p>(b) Form HUD-50070, <i>Certification for a Drug-Free Workplace</i> (PHAs receiving CFP grants only) - See Attachment #11-B</p> <p>(c) Form HUD-50071, <i>Certification of Payments to Influence Federal Transactions</i> (PHAs receiving CFP grants only) See Attachment #11-C</p> <p>(d) Form SF-LLL, <i>Disclosure of Lobbying Activities</i> (PHAs receiving CFP grants only) - See Attachment #11-D</p> <p>(e) Form SF-LLL-A, <i>Disclosure of Lobbying Activities Continuation Sheet</i> (PHAs receiving CFP grants only) - See Attachment #11-E</p> <p>(f) Resident Advisory Board (RAB) comments. Comments received from the RAB must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the recommendations and the decisions made on these recommendations. See Attachment #11-F</p> <p>(g) Challenged Elements - None</p> <p>(h) Form HUD-50075.1, <i>Capital Fund Program Annual Statement/Performance and Evaluation Report</i> (PHAs receiving CFP grants only) See Attachment # 8.1</p> <p>(i) Form HUD-50075.2, <i>Capital Fund Program Five-Year Action Plan</i> (PHAs receiving CFP grants only) See Attachment #8.2</p>

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 5-Year and Annual PHA Plans. 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, and informs HUD, families served by the PHA, and members of the public of the PHA's mission and strategies for serving the needs of low-income and very low-income families. This form is to be used by all PHA types for submission of the 5-Year and Annual Plans to HUD. Public reporting burden for this information collection is estimated to average 12.68 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

Instructions form HUD-50075

Applicability. This form is to be used by all Public Housing Agencies (PHAs) with Fiscal Year beginning April 1, 2008 for the submission of their 5-Year and Annual Plan in accordance with 24 CFR Part 903. The previous version may be used only through April 30, 2008.

1.0 PHA Information

Include the full PHA name, PHA code, PHA type, and PHA Fiscal Year Beginning (MM/YYYY).

2.0 Inventory

Under each program, enter the number of Annual Contributions Contract (ACC) Public Housing (PH) and Section 8 units (HCV).

3.0 Submission Type

Indicate whether this submission is for an Annual and Five Year Plan, Annual Plan only, or 5-Year Plan only.

4.0 PHA Consortia

Check box if submitting a Joint PHA Plan and complete the table.

5.0 Five-Year Plan

Identify the PHA's Mission, Goals and/or Objectives (24 CFR 903.6). Complete only at 5-Year update.

5.1 Mission. A statement of the mission of the public housing agency for serving the needs of low-income, very low-income, and extremely low-income families in the jurisdiction of the PHA during the years covered under the plan.

5.2 Goals and Objectives. Identify quantifiable goals and objectives that will enable the PHA to serve the needs of low income, very low-income, and extremely low-income families.

6.0 PHA Plan Update. In addition to the items captured in the Plan template, PHAs must have the elements listed below readily available to the public. Additionally, a PHA must:

- (a) Identify specifically which plan elements have been revised since the PHA's prior plan submission.
- (b) Identify where the 5-Year and Annual Plan may be obtained 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 its official website. PHAs are also encouraged to provide each resident council a copy of its 5-Year and Annual Plan.

PHA Plan Elements. (24 CFR 903.7)

1. **Eligibility, Selection and Admissions Policies, including Deconcentration and Wait List Procedures.** Describe the PHA's policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV and unit assignment policies for public housing; and procedures for maintaining waiting lists for admission to public housing and address any site-based waiting lists.

2. **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.

3. **Rent Determination.** A statement of the policies of the PHA governing rents charged for public housing and HCV dwelling units.

4. **Operation and Management.** A statement of the rules, standards, and policies of the PHA governing maintenance 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.

5. **Grievance Procedures.** A description of the grievance and informal hearing and review procedures that the PHA makes available to its residents and applicants.

6. **Designated Housing for Elderly and Disabled Families.** With respect to public housing projects owned, assisted, or operated by the PHA, describe any projects (or portions thereof), in the upcoming fiscal year, that the PHA has designated or will apply for designation for occupancy by elderly and disabled families. The description shall 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, and; 5) the number of units affected.

7. **Community Service and Self-Sufficiency.** A description of: (1) Any programs relating to services and amenities provided or offered to assisted families; (2) Any policies or programs of the PHA for the enhancement of the economic and social self-sufficiency of assisted families, including programs under Section 3 and FSS; (3) How the PHA will comply with the requirements of community service and treatment of income changes resulting from welfare program requirements. (Note: applies to only public housing).

8. **Safety and Crime Prevention.** For public housing only, describe the PHA's plan for safety and crime prevention to ensure the safety of the public housing residents. The statement must include: (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.

9. **Pets.** A statement describing the PHAs policies and requirements pertaining to the ownership of pets in public housing.
10. **Civil Rights Certification.** A PHA will be considered in compliance with the Civil Rights and AFFH Certification if: it can document that it examines its programs and proposed programs to identify any 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.
11. **Fiscal Year Audit.** The results of the most recent fiscal year audit for the PHA.
12. **Asset Management.** A statement of 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.
13. **Violence Against Women Act (VAWA).** 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.

7.0 Hope VI, Mixed Finance Modernization or Development, Demolition and/or Disposition, Conversion of Public Housing, Homeownership Programs, and Project-based Vouchers

- (a) **Hope VI or 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 HOPE VI or Mixed Finance Modernization or Development; and 2) A timetable for the submission of applications or proposals. The application and approval process for Hope VI, Mixed Finance Modernization or Development, is a separate process. See guidance on HUD's website at: <http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm>
- (b) **Demolition and/or Disposition.** With respect to public housing projects owned by the PHA and subject to ACCs under the Act: (1) A description of any housing (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; and (2) A timetable for the demolition or disposition. The application and approval process for demolition and/or disposition is a separate process. See guidance on HUD's website at: http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm
Note: This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed.
- (c) **Conversion of Public Housing.** With respect to public housing owned by a PHA: 1) A description of any building or buildings (including project number and unit count) that the PHA is required to convert to tenant-based assistance or

that the public housing agency plans to voluntarily convert; 2) An analysis of the projects or buildings required to be converted; and 3) A statement of the amount of assistance received under this chapter 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/ccenters/sac/conversion.cfm>

- (d) **Homeownership.** A description of any homeownership (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval.
- (e) **Project-based Vouchers.** If the PHA wishes to use the project-based voucher program, a statement of the projected number of project-based units and general locations and how project basing would be consistent with its PHA Plan.

8.0 Capital Improvements. This section provides information on a PHA's Capital Fund Program. With respect to public housing projects owned, assisted, or operated by the public housing agency, a plan describing the capital improvements necessary to ensure long-term physical and social viability of the projects must be completed along with the required forms. Items identified in 8.1 through 8.3, must be signed where directed and transmitted electronically along with the PHA's Annual Plan submission.

8.1 Capital Fund Program Annual Statement/Performance and Evaluation Report. PHAs must complete the *Capital Fund Program Annual Statement/Performance and Evaluation Report* (form HUD-50075.1), for each Capital Fund Program (CFP) to be undertaken with the current year's CFP funds or with CFFP proceeds. Additionally, the form shall be used for the following purposes:

- (a) To submit the initial budget for a new grant or CFFP;
- (b) To report on the Performance and Evaluation Report progress on any open grants previously funded or CFFP; and
- (c) To record a budget revision on a previously approved open grant or CFFP, e.g., additions or deletions of work items, modification of budgeted amounts that have been undertaken since the submission of the last Annual Plan. The Capital Fund Program Annual Statement/Performance and Evaluation Report must be submitted annually.

Additionally, PHAs shall complete the Performance and Evaluation Report section (see footnote 2) of the *Capital Fund Program Annual Statement/Performance and Evaluation* (form HUD-50075.1), at the following times:

1. At the end of the program year, until the program is completed or all funds are expended;
2. When revisions to the Annual Statement are made, which do not require prior HUD approval, (e.g., expenditures for emergency work, revisions resulting from the PHAs application of fungibility); and
3. Upon completion or termination of the activities funded in a specific capital fund program year.

8.2 Capital Fund Program Five-Year Action Plan

PHAs must submit the *Capital Fund Program Five-Year Action Plan* (form HUD-50075.2) for the entire PHA portfolio for the first year of participation in the CFP and annual update thereafter to eliminate the previous year and to add a new fifth year (rolling basis) so that the form always covers the present five-year period beginning with the current year.

8.3 Capital Fund Financing Program (CFFP). Separate, written HUD approval is required if the PHA proposes to pledge any

portion of its CFP/RHF funds to repay debt incurred to finance capital improvements. The PHA must identify in its Annual and 5-year capital plans the amount of the annual payments required to service the debt. The PHA must also submit an annual statement detailing the use of the CFFP proceeds. See guidance on HUD's website at:

<http://www.hud.gov/offices/pih/programs/ph/capfund/cffp.cfm>

9.0 Housing Needs. Provide a statement of the housing needs of families residing in the jurisdiction served by the PHA and the means by which the PHA intends, to the maximum extent practicable, to address those needs. (Note: Standard and Troubled PHAs complete annually; Small and High Performers complete only for Annual Plan submitted with the 5-Year Plan).

9.1 Strategy for Addressing Housing Needs. Provide a description of the PHA's strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year. (Note: Standard and Troubled PHAs complete annually; Small and High Performers complete only for Annual Plan submitted with the 5-Year Plan).

10.0 Additional Information. Describe the following, as well as any additional information requested by HUD:

- (a) **Progress in Meeting Mission and Goals.** PHAs must include (i) a statement of the PHAs progress in meeting the mission and goals described in the 5-Year Plan; (ii) the basic criteria the PHA will use for determining a significant amendment from its 5-year Plan; and a significant amendment or modification to its 5-Year Plan and Annual Plan. (Note: Standard and Troubled PHAs complete annually; Small and High Performers complete only for Annual Plan submitted with the 5-Year Plan).
- (b) **Significant Amendment and Substantial Deviation/Modification.** PHA must provide the definition of "significant amendment" and "substantial deviation/modification". (Note: Standard and Troubled PHAs complete annually; Small and High Performers complete only for Annual Plan submitted with the 5-Year Plan.)

- (c) PHAs must include or reference any applicable memorandum of agreement with HUD or any plan to improve performance. (Note: Standard and Troubled PHAs complete annually).

11.0 Required Submission for HUD Field Office Review. In order to be a complete package, PHAs must submit items (a) through (g), with signature by mail or electronically with scanned signatures. Items (h) and (i) shall be submitted electronically as an attachment to the PHA Plan.

- (a) Form HUD-50077, *PHA Certifications of Compliance with the PHA Plans and Related Regulations*
- (b) Form HUD-50070, *Certification for a Drug-Free Workplace (PHAs receiving CFP grants only)*
- (c) Form HUD-50071, *Certification of Payments to Influence Federal Transactions (PHAs receiving CFP grants only)*
- (d) Form SF-LLL, *Disclosure of Lobbying Activities (PHAs receiving CFP grants only)*
- (e) Form SF-LLL-A, *Disclosure of Lobbying Activities Continuation Sheet (PHAs receiving CFP grants only)*
- (f) Resident Advisory Board (RAB) comments.
- (g) Challenged Elements. Include any element(s) of the PHA Plan that is challenged.
- (h) Form HUD-50075.1, *Capital Fund Program Annual Statement/Performance and Evaluation Report (Must be attached electronically for PHAs receiving CFP grants only). See instructions in 8.1.*
- (i) Form HUD-50075.2, *Capital Fund Program Five-Year Action Plan (Must be attached electronically for PHAs receiving CFP grants only). See instructions in 8.2.*

2013 AGENCY PLAN UPDATE
DRAFT / PUBLIC COMMENT STAGE
SUMMARY OF ATTACHMENTS

Attachment #5 – Mission Statement, Five Year and Annual Goals

Attachment #6 – Proposed Changes in PHA Plan Elements

- Public Housing Program Utility Allowance Schedule
- Section 8 Housing Choice Voucher Program Utility Allowance Schedule

Attachment #7 – Statement Regarding use of Project-Based Vouchers

Attachment #8.1 – Capital Fund Program Annual Statement / Performance and Evaluation Report

Attachment #8.2 – Capital Fund Program Five-Year Action Plan

Attachment #8.3 – Capital Fund Program Management Needs Assessment and Five-Year Action Plan for Management Improvements

Attachment #9 – Statement of Housing Needs

Attachment #9.1 – Strategy for Addressing Housing Needs

Attachment #10-A - Progress in Meeting Mission and Goals

Attachment #11 – Carbon Monoxide Detector Law Compliance Statement

**ATTACHMENT #5 – MISSION STATEMENT,
FIVE YEAR AND ANNUAL GOALS**

**5-YEAR PLAN
PHA FISCAL YEARS 2011 - 2015**

A. Mission

It is the mission of the St. Clair County Housing Authority (SCCHA) to provide well-maintained and safe assisted housing to the eligible low-income residents of St. Clair County. SCCHA is committed to assisting residents in meeting their personal development goals, especially those related to achieving economic self-sufficiency and those related to senior citizens maintaining an independent lifestyle. SCCHA is committed to providing its services in an efficient, economical, and legally responsible manner.

B. Goals

The goals of the St. Clair County Housing Authority for the fiscal years 2011 through 2015 are:

- Expand the supply of assisted housing by reducing public housing vacancies and leveraging private or other public funds to create additional housing opportunities.
- Improve the quality of assisted housing through improved public housing and voucher management, increased customer satisfaction, renovating or modernizing the public housing stock using Capital Fund Program, and full implementation of project based budgeting and asset management approach to public housing operations.
- Increasing assisted housing choices by providing voucher mobility counseling, conducting outreach efforts to potential voucher landlords, maintaining voucher payment standards at a level at least equivalent to 100% of the FMR, and continued utilization of site-based wait lists for the public housing program.
- Provide an improved living environment by implementing income deconcentration 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.
- Promote self-sufficiency and asset development of families and individuals by increasing the number and percentage of employed persons in assisted families, establishing linkages with supportive services to improve assistance recipients' employability and increase the independence for the elderly or families with disabilities.
- Ensure equal opportunity in housing for all persons by continuing affirmative measures to: ensure access to assisted housing regardless of race, color, religion, national origin, sex, familial status and disability; provide a suitable living environment for families living in assisted housing, regardless of race, color, religion, national origin, sex, familial status, and disability; and ensure accessible housing to persons with all varieties of disabilities regardless of unit size required.

ANNUAL PLAN GOALS FOR APU 2013

- 1) Continued development of Asset Management Systems and implementation of Project Based Budgeting Process to comply with federal law, HUD regulations, and to assess the financial performance and long-term viability of each public housing "property."
- 2) For increased efficiency and improved management, reconfigure the AMPs (Asset Management Projects) in the public housing program, reducing the number of AMPs from eleven (11) to six (6).
- 3) Continue to utilize Capital Fund Program to upgrade / modernize the public housing stock and also the implementation of GPNA for all AMPs.
- 4) 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.
- 5) Continue fire prevention efforts, including vigilant unit inspections by maintenance and/or management personnel and completing the installation of stove top fire extinguisher devices in all public housing units.
- 6) Comply with statutory and any HUD regulatory requirements to maintain site-based wait lists for public housing program.
- 7) Arrange for Fair Housing and Reasonable Accommodation Training for all staff involved in wait list, admissions and/or continued occupancy activities for any federal housing program administered.
- 8) Complete rehabilitation of Cedar Ridge Rural Development Property (Lebanon) using grant through the Illinois Housing Development Authority (IHDA).
- 9) Update 504 Accessibility Plan.
- 10) Implement policies and procedures related to non-smoking designation for Bel-Plaza 1 & 2 Buildings in Belleville and Adeline James Building in Centreville.

ATTACHMENT #6.0 – PROPOSED CHANGES IN PHA PLAN ELEMENTS



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

February 28, 2013

Dear Public Housing Resident:

Please be advised that the St. Clair County Housing Authority (SCCHA) has completed its annual review of the Utility Allowance Schedule (UAS) for its public housing properties.

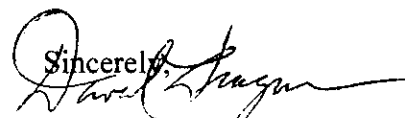
The review was conducted by staff and included surveying local utility providers for rate changes within the last twelve months and reviewing average consumption / cost records. The proposed UAS for 2013 is attached for review and is scheduled to go into effect May 1, 2013. The proposed UAS is subject to a resident review and written comment period of 60 days, which began February 1, 2013 with the initial notice that was included in the envelope that was mailed January 31, 2013 and contained your February rent statement.

The UAS is based upon local utility rates adjusted for climatic conditions and unit size / building type using estimated consumption levels established by HUD guidelines. The UAS is based on resident-purchased utilities, which varies by public housing location, but can include any combination of natural gas, electric, water, sewer and / or trash services. Supporting documentation is available for review upon request at the SCCHA Office in Belleville, during normal business hours.

The UAS will be implemented through-out 2013 in accordance with the annual recertification for each resident household.

Residents may request "individual relief" from payment of utility supplier billings in excess of the allowances for resident-purchased utilities as outlined in the attached notice.

Should you have any questions, you may contact your assigned management representative or a member of the Central Office management staff. Written comments regarding the proposed UAS will be accepted at this office through March 31, 2013.

Sincerely,


David L. Wagner
Executive Director

"EQUAL HOUSING OPPORTUNITY"

EXECUTIVE DIRECTOR
Dave Wagner

ATTORNEY
Philip Rice
Kevin Kaufhold

COMMISSIONERS
Eugene Verdu, Chairman
Daniel Barger

Billie Jean Miller
Vivian Cash
Phil Johnson

St. Clair County Housing Authority
Public Housing Utility Allowance Schedule
Effective Date: May 1, 2013

Development		Bedroom Size					
		0	1	2	3	4	5
30-1	Brooklyn		94	108	121	138	151
30-2	Marissa			109	123	139	
30-2C ¹	Marissa			174			
30-3	Dupo	73	90	104	120	130	
30-5	Smithton		95		122	139	
30-6 no Hi	Centreville		95	108	122	139	
30-6 Hi	Centreville Hi-Rise		49	58			
30-6 H-C 0/0 ²	Centreville Hi-Rise		78				
30-6 H-C 1/0 ³	Centreville Hi-Rise		88				
30-60	Centreville		95	108	122	139	
30-7	Marissa		95				
30-8	Centreville		95	108	122		149
30-80	Centreville			108	122		
30-9 – Gas Heat	Brooklyn		130	152	174		
30-9A – Elec. Heat ⁴	Brooklyn			167			
30-10	Centreville		98	112	129	145	
30-11	Alorton		107	132	150	181	
30-12	Brooklyn		124	145	167		
30-13	New Athens		159	191			
30-14	Lebanon		136	174	237		
30-16 (North 47 th)	Belleville Bel-Plaza 2		70				
30-61 (S. Church)	Belleville Bel-Plaza-1		74				
30-17	Washington Park		125	146			
30-17A S/F House ⁵	Washington Park			183			
30-18	Swansea		135				
30-19	Lenzburg		97	114			
30-20	Centreville		91				
30-21	New Athens		159				
30-22	Millstadt		199	253	307		
30-24A ⁶	O'Fallon			112			
30-24B	O'Fallon			200			
30-27	Belleville – Amber Ct.		86	110			
30-28	Lenzburg			116	163		

Proposed Effective Date: May 1, 2013
Resident Comment Period: February 1 through March 31, 2013
Board Approval Date: April 10, 2013

¹ Units = U11, A12, A31, A32, A41, A42, B21, B22

² Units = 202, 302, 402, 502

³ Units = 206, 306, 406, 506

⁴ Units = 604, 606, 608, 610, 616, 618, 620, 622, 628, 630, 632, 634 South 5th St.

⁵ Units = 1800, 1826, 2236 and 2240

⁶ Buildings = 301 and 303 Estate



NOTIFICATION OF OPPORTUNITY TO APPLY FOR INDIVIDUAL RELIEF

Should a resident incur and pay utility bills in excess of the established allowances as a result of excessive consumption not within the control of the resident, he/she has the right to request individual relief from SCCHA. Individual relief shall be granted in situations where the excess consumption was clearly not within the reasonable control of the resident. Examples include, but are not necessarily limited to: **A) leak in water lines not reasonably detectable by the resident; B) a verifiable equipment malfunction (i.e. furnace) not within the control nor reasonably detectable by the resident that results in excess utility consumption; C) SCCHA 's failure to correct within a reasonable time period a condition that causes excessive utility consumption, provided that the condition is properly and timely reported to SCCHA.**

Relief shall not be granted in situations where the resident could reasonably be expected to detect the condition causing excess consumption and/or failed to report the condition to SCCHA in the proper and timely manner.


In cases where it is determined that individual relief is warranted, the amount of the relief shall be determined based on the difference between the actual costs incurred and the average cost for a similar time period prior to the occurrence of the condition that resulted in the excess consumption. The relief determined appropriate, relief may be granted in the form of a check payable either to the resident and/or the appropriate utility company.

Residents interested in applying for individual relief must submit a written request explaining in detail the circumstances resulting in their belief that individual relief is warranted. Written requests must be submitted to the Property Manager within 30 days of the date of the filling for which individual relief is sought.

Your signature below demonstrates acknowledgement of the aforementioned.

_____	_____	_____	_____
Leasehead	Date	Co-Resident	Date
_____	_____		
SCCHA Staff Signature	Date		

To: Dave Wagner, Executive Director

Fr: Pam Jackson, Program Director
Larry McLean, Deputy Director 

Re: Proposed Utility Allowance Schedule for Section 8 HCVP

Dt: February 8, 2013

The attached Utility Allowance Schedule (UAS) is recommended for approval by the Board of Commissioners at their February 13, 2013 meeting.

The schedules were updated by staff to reflect rate increases implemented by utility service providers since the 2012 UAS was prepared.

Upon Board approval, the utility allowance schedule will be implemented effective April 1, 2013 for annual recertifications and February 13, 2013 for new admissions and unit transfers.

If you have any questions, comments or need any additional information, please let us know.

Thank you.

**Allowances for Tenant
Furnished Utilities and other
Services**

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

OMB Approval No. 2577-0169

Locality: St Clair County Housing Authority, IL		Unit Type: Apartment/ Walk-Up				Effective Date 4/1/13 (annuals), 2/13/13 (moves / new admits)	
Utility or Service		Monthly Dollar Allowances					
		0 BR	1 BR	2 BR	3 BR	4 BR	5 BR
Heating	a. Natural Gas	\$13.00	\$15.00	\$17.00	\$19.00	\$21.00	\$22.00
	b. Bottle Gas	\$30.00	\$33.00	\$38.00	\$43.00	\$46.00	\$51.00
	c. Electric	\$15.00	\$22.00	\$29.00	\$35.00	\$43.00	\$51.00
	d. Oil / Other	\$40.00	\$48.00	\$55.00	\$60.00	\$67.00	\$71.00
Cooking	a. Natural Gas	\$3.00	\$4.00	\$5.00	\$6.00	\$8.00	\$9.00
	b. Bottle Gas	\$7.00	\$9.00	\$12.00	\$14.00	\$17.00	\$20.00
	c. Electric	\$5.00	\$7.00	\$9.00	\$12.00	\$15.00	\$17.00
	d. Coal / Other	N/A	N/A	N/A	N/A	N/A	N/A
Other Electric (Includes Monthly Fee)		\$33.00	\$42.00	\$49.00	\$56.00	\$64.00	\$72.00
Air Conditioning		\$5.00	\$7.00	\$11.00	\$16.00	\$20.00	\$24.00
Water Heating	a. Natural Gas	\$5.00	\$8.00	\$11.00	\$14.00	\$17.00	\$20.00
	b. Bottle Gas	\$12.00	\$18.00	\$25.00	\$32.00	\$38.00	\$45.00
	c. Electric	\$11.00	\$17.00	\$23.00	\$29.00	\$34.00	\$40.00
	d. Oil / Other	\$18.00	\$29.00	\$40.00	\$49.00	\$60.00	\$71.00
Water		\$27.00	\$36.00	\$44.00	\$52.00	\$60.00	\$70.00
Sewer		\$11.00	\$17.00	\$24.00	\$31.00	\$37.00	\$44.00
Trash Collection		\$19.00	\$19.00	\$19.00	\$19.00	\$19.00	\$19.00
Range / Microwave		\$4.00	\$4.00	\$4.00	\$4.00	\$4.00	\$4.00
Refrigerator		\$7.00	\$7.00	\$7.00	\$7.00	\$7.00	\$7.00
Other--specify: Natural Gas Monthly Fee		\$21.00	\$21.00	\$21.00	\$21.00	\$21.00	\$21.00
Other--specify: Sewer Treatment		\$8.00	\$15.00	\$23.00	\$30.00	\$38.00	\$45.00
Actual Family Allowances				Utility or Service		per month cost	
To be used by the family to compute allowance. Complete below for the actual unit rented.				Heating		\$	
				Cooking		\$	
Name of Family				Other Electric		\$	
				Air Conditioning		\$	
				Water Heating		\$	
				Water		\$	
Address of Unit				Sewer		\$	
				Trash Collection		\$	
				Range / Microwave		\$	
				Refrigerator		\$	
				Other		\$	
				Other		\$	
Number of Bedrooms				Other		\$	
				Total		\$	

**Allowances for Tenant
Furnished Utilities and other
Services**

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

OMB Approval No. 2577-0169

Locality: St Clair County Housing Authority, IL		Unit Type: Row House/ Townhouse & Semi-Detached/ Duplex				Effective Date 4/1/13 (annuals), 2/13/13 (moves / new admits)	
Utility or Service		Monthly Dollar Allowances					
		0 BR	1 BR	2 BR	3 BR	4 BR	5 BR
Heating	a. Natural Gas	\$20.00	\$28.00	\$36.00	\$44.00	\$52.00	\$60.00
	b. Bottle Gas	\$44.00	\$63.00	\$81.00	\$100.00	\$119.00	\$137.00
	c. Electric	\$20.00	\$29.00	\$36.00	\$45.00	\$53.00	\$62.00
	d. Oil / Other	\$37.00	\$72.00	\$109.00	\$144.00	\$180.00	\$215.00
Cooking	a. Natural Gas	\$3.00	\$4.00	\$5.00	\$6.00	\$8.00	\$9.00
	b. Bottle Gas	\$7.00	\$9.00	\$12.00	\$14.00	\$17.00	\$20.00
	c. Electric	\$5.00	\$7.00	\$9.00	\$12.00	\$15.00	\$17.00
	d. Coal / Other	N/A	N/A	N/A	N/A	N/A	N/A
Other Electric (Includes Monthly Fee)		\$33.00	\$44.00	\$53.00	\$67.00	\$76.00	\$86.00
Air Conditioning		\$5.00	\$7.00	\$13.00	\$19.00	\$25.00	\$30.00
Water Heating	a. Natural Gas	\$5.00	\$8.00	\$11.00	\$14.00	\$17.00	\$20.00
	b. Bottle Gas	\$12.00	\$18.00	\$25.00	\$32.00	\$38.00	\$45.00
	c. Electric	\$11.00	\$17.00	\$23.00	\$29.00	\$34.00	\$40.00
	d. Oil / Other	\$18.00	\$29.00	\$40.00	\$49.00	\$60.00	\$71.00
Water		\$27.00	\$37.00	\$44.00	\$52.00	\$60.00	\$68.00
Sewer		\$11.00	\$17.00	\$24.00	\$31.00	\$37.00	\$44.00
Trash Collection		\$19.00	\$19.00	\$19.00	\$19.00	\$19.00	\$19.00
Range / Microwave		\$4.00	\$4.00	\$4.00	\$4.00	\$4.00	\$4.00
Refrigerator		\$7.00	\$7.00	\$7.00	\$7.00	\$7.00	\$7.00
Other--specify: Natural Gas Monthly Fee		\$21.00	\$21.00	\$21.00	\$21.00	\$21.00	\$21.00
Other--specify: Sewer Treatment		\$8.00	\$15.00	\$23.00	\$30.00	\$38.00	\$45.00
Actual Family Allowances				Utility or Service		per month cost	
To be used by the family to compute allowance. Complete below for the actual unit rented.				Heating		\$	
				Cooking		\$	
Name of Family				Other Electric		\$	
				Air Conditioning		\$	
				Water Heating		\$	
				Water		\$	
Address of Unit				Sewer		\$	
				Trash Collection		\$	
				Range / Microwave		\$	
				Refrigerator		\$	
Number of Bedrooms				Other		\$	
				Other		\$	
				Total		\$	

**Allowances for Tenant
Furnished Utilities and other
Services**

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

OMB Approval No. 2577-0169

Locality: St Clair County Housing Authority, IL		Unit Type: Detached House				Effective Date 4/1/13 (annuals), 2/13/13 (moves / new admits)	
Utility or Service		Monthly Dollar Allowances					
		0 BR	1 BR	2 BR	3 BR	4 BR	5 BR
Heating	a. Natural Gas	\$17.00	\$27.00	\$38.00	\$48.00	\$59.00	\$69.00
	b. Bottle Gas	\$38.00	\$62.00	\$85.00	\$109.00	\$133.00	\$157.00
	c. Electric	\$27.00	\$36.00	\$46.00	\$56.00	\$67.00	\$76.00
	d. Oil / Other	\$54.00	\$88.00	\$121.00	\$156.00	\$190.00	\$224.00
Cooking	a. Natural Gas	\$3.00	\$4.00	\$5.00	\$6.00	\$8.00	\$9.00
	b. Bottle Gas	\$7.00	\$9.00	\$12.00	\$14.00	\$17.00	\$20.00
	c. Electric	\$5.00	\$7.00	\$9.00	\$12.00	\$15.00	\$16.00
	d. Coal / Other						
Other Electric (Includes Monthly Fee)		\$41.00	\$51.00	\$61.00	\$75.00	\$85.00	\$96.00
Air Conditioning		\$5.00	\$9.00	\$14.00	\$20.00	\$25.00	\$31.00
Water Heating	a. Natural Gas	\$5.00	\$8.00	\$11.00	\$14.00	\$17.00	\$20.00
	b. Bottle Gas	\$12.00	\$18.00	\$25.00	\$32.00	\$38.00	\$45.00
	c. Electric	\$10.00	\$17.00	\$23.00	\$28.00	\$33.00	\$38.00
	d. Oil / Other	\$18.00	\$30.00	\$40.00	\$49.00	\$60.00	\$71.00
Water		\$27.00	\$36.00	\$44.00	\$52.00	\$60.00	\$68.00
Sewer		\$11.00	\$17.00	\$24.00	\$31.00	\$37.00	\$44.00
Trash Collection		\$19.00	\$19.00	\$19.00	\$19.00	\$19.00	\$19.00
Range / Microwave		\$4.00	\$4.00	\$4.00	\$4.00	\$4.00	\$4.00
Refrigerator		\$7.00	\$7.00	\$7.00	\$7.00	\$7.00	\$7.00
Other--specify: Natural Gas Monthly Fee		\$21.00	\$21.00	\$21.00	\$21.00	\$21.00	\$21.00
Other--specify: Sewer Treatment		\$8.00	\$15.00	\$23.00	\$30.00	\$38.00	\$45.00
Actual Family Allowances			Utility or Service		per month cost		
To be used by the family to compute allowance. <i>Complete below for the actual unit rented.</i>			Heating		\$		
			Cooking		\$		
Name of Family			Other Electric		\$		
			Air Conditioning		\$		
			Water Heating		\$		
			Water		\$		
Address of Unit			Sewer		\$		
			Trash Collection		\$		
			Range / Microwave		\$		
			Refrigerator		\$		
			Other		\$		
			Other		\$		
			Other		\$		
Number of Bedrooms			Total		\$		

**Allowances for Tenant
Furnished Utilities and other
Services**

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

OMB Approval No. 2577-0169

Locality: St Clair County Housing Authority, IL		Unit Type: Mobile Home				Effective Date: 4/1/13 for annuals & 2/13/13 for moves & new admits	
Utility or Service		Monthly Dollar Allowances					
		0 BR	1 BR	2 BR	3 BR	4 BR	5 BR
Heating	a. Natural Gas	\$31.00	\$32.00	\$33.00	\$34.00	\$35.00	\$37.00
	b. Bottle Gas	\$69.00	\$72.00	\$74.00	\$78.00	\$81.00	\$83.00
	c. Electric	\$47.00	\$47.00	\$48.00	\$48.00	\$49.00	\$51.00
	d. Oil / Other	\$55.00	\$90.00	\$125.00	\$160.00	\$195.00	\$230.00
Cooking	a. Natural Gas	\$3.00	\$4.00	\$5.00	\$6.00	\$8.00	\$9.00
	b. Bottle Gas	\$7.00	\$9.00	\$12.00	\$14.00	\$17.00	\$20.00
	c. Electric	\$5.00	\$7.00	\$9.00	\$12.00	\$15.00	\$16.00
	d. Coal / Other						
Other Electric (Includes Monthly Fee)		\$35.00	\$46.00	\$57.00	\$68.00	\$79.00	\$89.00
Air Conditioning		N/A	\$8.00	\$14.00	\$20.00	\$26.00	\$32.00
Water Heating	a. Natural Gas	\$5.00	\$8.00	\$11.00	\$14.00	\$17.00	\$20.00
	b. Bottle Gas	\$12.00	\$18.00	\$25.00	\$32.00	\$38.00	\$45.00
	c. Electric	\$10.00	\$17.00	\$23.00	\$28.00	\$33.00	\$38.00
	d. Oil / Other	\$18.00	\$29.00	\$40.00	\$49.00	\$60.00	\$71.00
Water		\$27.00	\$36.00	\$44.00	\$52.00	\$60.00	\$68.00
Sewer		\$11.00	\$17.00	\$24.00	\$31.00	\$37.00	\$44.00
Trash Collection		\$19.00	\$19.00	\$19.00	\$19.00	\$19.00	\$19.00
Range / Microwave		\$4.00	\$4.00	\$4.00	\$4.00	\$4.00	\$4.00
Refrigerator		\$7.00	\$7.00	\$7.00	\$7.00	\$7.00	\$7.00
Other--specify: Natural Gas Monthly Fee		\$21.00	\$21.00	\$21.00	\$21.00	\$21.00	\$21.00
Other--specify: Sewer Treatment		\$8.00	\$15.00	\$23.00	\$30.00	\$38.00	\$45.00
Actual Family Allowances			Utility or Service		per month cost		
To be used by the family to compute allowance. Complete below for the actual unit rented.			Heating		\$		
			Cooking		\$		
Name of Family			Other Electric		\$		
			Air Conditioning		\$		
			Water Heating		\$		
Address of Unit			Water		\$		
			Sewer		\$		
			Trash Collection		\$		
			Range / Microwave		\$		
			Refrigerator		\$		
			Other		\$		
Number of Bedrooms			Other		\$		
			Total		\$		

Non-Smoking 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

Initial implementation of the non-smoking policy shall be in the three elderly hi-rise locations known as:

- Bel-Plaza 1 located at 114 South Church St., Belleville
- Bel-Plaza 2 located at 115 North 47th St., Belleville
- Adeline James Building located at 4701 Bates, Centreville

The non-smoking policy / lease addendum shall be effective July 1, 2013. The July 1, 2013 effective date applies to all residents at the "designated locations." There is no "grandfather" or other exemption from the policy. Residents of the designated locations were given more than one year notice of the St. Clair County Housing Authority's (SCCHA) intent to declare these locations as non-smoking effective July 1, 2013. Notice was first given in conjunction with the 2012 Agency Plan Update process. Residents were periodically reminded of the July 1, 2013 effective date through-out 2012 and 2013.

Non-Smoking Areas

Smoking will not be permitted in any area of the interior of the buildings, including individual apartments and all common areas, and within fifteen feet (15') of any exterior doorway or operable window.

Smoking is defined as inhaling, exhaling, breathing or carrying any lit cigar, cigarette, pipe or other similar tobacco product in any manner or in any form.

Those affected by the no-smoking policy

This policy applies to everyone --- including residents, guests, visitors, service personnel and SCCHA employees ---who visits, lives and works at the designated locations.

The new no-smoking policy **does not** mean that residents will have to quit smoking in order to live at the designated locations. The new policy will only prohibit smoking (as defined) in the "non-smoking areas" at the designated properties.

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.

No-smoking Signage

SCCHA shall post "no smoking" signs at the designated locations at its discretion.

Lease Addendum

Residents of the designated locations will be required to sign a lease addendum that specifies smoking will be prohibited inside all apartment units, indoor common areas, and within fifteen (15) feet from any entrance / exit / operable window. The non-smoking policy is not a campus wide ban on smoking and only focuses on indoor smoking practices.

Cessation Education

To assist all residents with the non-smoking 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.

Violation of provision of this policy shall generally be handled as follows:

1st – Infraction – Verbal Warning

2nd – 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.

Complaints / Investigations

If a resident (or other party) witnesses someone smoking or smells tobacco smoke in any place within the interior of the designated locations 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.

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

Addendum #1 Designated Non-Smoking Buildings (Only applicable to Bel-Plaza 1 & 2 Buildings in Belleville and Adeline James Building in Centreville)

The "senior citizen only" buildings located at 114 South Church Street, Belleville (Bel-Plaza 1), 115 North 47th Street, Belleville (Bel-Plaza 2), and 4701 Bates, Centreville (Adeline James Building) were designated as non-smoking buildings effective July 1, 2013. Residents, along with their guests and visitors, are prohibited from smoking cigarettes, cigars and any other tobacco product within the confines of these buildings, including all interior common areas, elevators, and individual dwelling units. Smoking is further prohibited within fifteen (15) feet of any entry point to these buildings.

Resident Signature (HOH): _____ Date: _____

Resident Signature (Co-Head): _____ Date: _____

Management Signature: _____ Date: _____

**ATTACHMENT #7 – STATEMENT REGARDING USE OF PROJECT – BASED
VOUCHERS**

Attachment #7

Statement Regarding Use of Project-Based Vouchers

The SCCHA established its discretionary authority to operate a project-based component of its Section 8 Housing Choice Voucher Program in 2006, exercising this option under the October 13, 2005 final rule. The option to set-aside up to 20% of HCV budget authority 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 the amount of its budget authority that 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 budget authority for its PBA program.

**ATTACHMENT #8-1 CAPITAL FUND PROGRAM ANNUAL STATEMENT /
PERFORMANCE AND EVALUATION REPORT**

Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

Part I: Summary

PHA Name: **St. Clair County Housing**

Authority

Grant Type and Number

Capital Fund Program Grant No: IL06P030501-10

Replacement Housing Factor Grant No:

Date of CFFP:

FFY of Grant: **2010**

FFY of Grant Approval **2010**

FORMULA AWARD

LOCCS January 2013

Type of Grant

- Original Annual Statement Reserve for Disasters/Emergencies Revised Annual Statement (revision no: 5)
 Performance and Evaluation Report for Period Ending: Final Performance and Evaluation Report

Summary by Development Account

Line	Total Estimated Cost	Total Actual Cost	
		Obligated	Expended
1			
2	269,494.00	125,000.00	125,000.00
3	112,500.00	112,500.00	106,061.75
4	164,747.00	164,747.00	164,747.00
5			
6			
7	64,000.00	76,222.00	76,222.00
8			
9	0.00	8,448.00	8,448.00
10	956,000.00	1,136,953.00	1,136,952.24
11			
12			
13	22,500.00	23,602.00	23,602.00
14			
15			
16			
17			

1 To be completed for the Performance and Evaluation Report
2 To be completed for the Performance and Evaluation Report or a Revised Annual Statement
3 PHAs with under 250 units in management may use 100% of CRP Grants for operations
4 RHF funds shall be included here

Part I: Summary

PHA Name: St. Clair County Housing Authority
Grant Type and Number
 Capital Fund Program Grant No: IL06P030501-10
 Replacement Housing Factor Grant No:
 Date of CFFP: **LOCCS January 2013**

FFY of Grant: 2010
FFY of Grant Approval 2010

Original Annual Statement Reserve for Disasters/Emergencies Revised Annual Statement (revision no: 5)
 Performance and Evaluation Report for Period Ending: Final Performance and Evaluation Report

Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost	
		Original	Revised	Obligated	Expended
18a	1501 Collateralization or Debt Service paid by the PHA				
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment				
19	1502 Contingency (may not exceed 8% of line 20)	58,231.00	0.00		
20	Amount of Annual Grant:: (sum of lines 2-19)	1,647,472.00	1,647,472.00	1,647,472.00	1,641,032.99
21	Amount of line 20 Related to LBP Activities				
22	Amount of line 20 Related to Section 504 Activities				
23	Amount of line 20 Related to Security - Soft costs				
24	Amount of line 20 Related to Security - Hard Costs				
25	Amount of line 20 Related to Energy Conservation Measures				

Signature of Executive Director _____ **Date** _____
Signature of Public Housing Director _____ **Date** _____

1 To be completed for the Performance and Evaluation Report
 2 To be completed for the Performance and Evaluation Report or a Revised Annual Statement
 3 PHAs with under 250 units in management may use 100% of CRP Grants for operations
 4 RHF funds shall be included here

Part II: Supporting Pages		Federal FFY of Grant: 2010											
PHA Name: St. Clair County Housing Authority		Capital Fund Program Grant No: IL06P030501-10											
Development Number Name/PHA-Wide Activities		Replacement Housing Factor Grant No:											
General Description of Major Work Categories		Development Account No.		Quantity		Total Estimated Cost		Total Actual Cost		Status of Work			
						Original		Revised		Funds Obligated		Funds Expended	
IL03000021	Centre ville (10)	Exterior Building Improvements, Electrical AC Sleeve Removal, Roof Replacement, Attic Insulation	1460	110	500,000.00	456,544.00	456,544.00	456,544.00	456,544.00	456,543.62	COMP		
IL03000022	Centre ville (60)	ADA Concrete Ramps, Exterior Door Replacement	1460	87	396,000.00	172,474.00	172,474.00	172,474.00	172,473.62	172,473.62	COMP		
IL03000021	Centre ville (10)	Construction Supervision and Inspection Costs Exterior Building Improvements, Electrical AC Sleeve Rem, Roof Repl, Attic Insulation	1460	0	36,000.00	3,900.00	3,900.00	3,900.00	3,900.00	3,900.00	COMP		
IL03000022	Centre ville (60)	Construction Supervision and Inspection Costs ADA Concrete Ramps, Exterior Door Repl.	1460	0	24,000.00	6,550.00	6,550.00	6,550.00	6,550.00	6,550.00	COMP		
IL030000031	Centre ville (08)	ADA Ramps	1460	6	0.00	3,316.00	3,316.00	3,316.00	3,316.00	3,316.00	COMP		
IL030000032	Centre ville (06)	Exterior Building Improvements	1460	8	0.00	494,169.00	494,169.00	494,169.00	494,169.00	494,169.00	COMP		
IL 30-24		Site Improvements	1450	1	0.00	8,448.00	8,448.00	8,448.00	8,448.00	8,448.00	COMP		
PH Wide		Administration	1410		164,747.00	164,747.00	164,747.00	164,747.00	164,747.00	164,747.00	COMP		
PH Wide		Architect and Engineer	1430		64,000.00	76,222.00	76,222.00	76,222.00	76,222.00	76,222.00	COMP		
PH Wide		Operating	1406		269,494.00	125,000.00	125,000.00	125,000.00	125,000.00	125,000.00	COMP		
PH Wide		Management Improvements											
		Management Staff Professional Develop.	1408		3,000.00	6,000.00	6,000.00	6,000.00	6,000.00	6,000.00	COMP		
		Resident Service Coord & Tech Support	1408		50,000.00	56,438.25	56,438.25	56,438.25	56,438.25	50,000.00	COMP		
		Family Self-Sufficiency Program	1408		5,000.00	3,561.75	3,561.75	3,561.75	3,561.75	3,561.75	COMP		
		Resident Council Development & Training	1408		12,000.00	4,590.74	4,590.74	4,590.74	4,590.74	4,590.74	COMP		
		Drug Elimination	1408		40,000.00	41,628.01	41,628.01	41,628.01	41,628.01	41,628.01	COMP		
		Software	1408		2,500.00	281.25	281.25	281.25	281.25	281.25	COMP		
		Hardware	1475		17,500.00	17,500.00	17,500.00	17,500.00	17,500.00	17,500.00	COMP		
		Security Equipment	1475		5,000.00	6,102.00	6,102.00	6,102.00	6,102.00	6,102.00	COMP		

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 3 PHAS with under 250 units in management may use 100% of CRP Grants for operations
 4 RHF funds shall be included here

Part III: Implementation Schedule for Capital Fund Financing Program							Federal FFY of Grant: 2010	
PHA Name: St. Clair County Housing Authority								
Development Number Name/PHA-Wide Activities	All Fund Obligated (Quarter Ending Date)		All Funds Expended (Quarter Ending Date)		Reasons for Revised Target Dates			
	Original Obligation End Date	Actual Obligation End Date	Original Expenditure End Date	Actual Expenditure End Date				
IL03000021 Centreville {10}	09/2012		09/2014					
IL03000022 Centreville {60}	09/2012		09/2014					
IL03000032 Centreville {06}	09/2012		09/2014					
IL03000051 Centreville {16}	09/2012		09/2014					
IL03000061 Washington Park {17}	09/2012		09/2014					
IL03000061 O'Fallon {24}	09/2012		09/2014					
IL03000062 Marissa, Lenzburg, Millstadt	09/2012		09/2014					
Property Wide	09/2012		09/2014					

1 Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended

Annual Statement/Performance and Evaluation Report

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 3/31/2014

Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

Part I: Summary

PHA Name: 5t. Clair County Housing **Grant Type and Number** **FFY of Grant: 2011**
Authority **Capital Fund Program Grant No: IL60P030501-11** **FFY of Grant Approval: 2011**
Replacement Housing Factor Grant No: **Date of CFFP:** **LOCCS Jan 2013 Rev . 3**

FORMULA AWARD

Type of Grant Original Annual Statement Reserve for Disasters/Emergencies Revised Annual Statement (revision no: 3)
 Performance and Evaluation Report for Period Ending: Final Performance and Evaluation Report

Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost	
		Original	Revised	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 21)	282,807.00	0.00	0.00	0.00
3	1408 Management Improvements	107,500.00	107,500.00	59,806.72	13,556.72
4	1410 Administration (may not exceed 10% of line 21)	141,403.00	141,404.00	141,404.00	141,404.00
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs	68,000.00	68,032.00	68,032.00	65,480.80
8	1440 Site Acquisition				
9	1450 Site Improvement	35,422.00	36,422.00	34,550.00	34,550.00
10	1460 Dwelling Structures	308,000.00	627,814.00	420,808.45	204,188.05
11	1465.1 Dwelling Equipment--Nonexpendable	437,000.00	396,701.31	327,673.55	0.00
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment	33,903.00	36,161.69	24,727.59	24,727.59
14	1485 Demolition				
15	1492 Moving to Work Demonstration				
16	1495.1 Relocation Costs				
17	1499 Development Activities				

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- 3 PHAs with under 250 units in management may use 100% of CRP Grants for operations
- 4 RHIF funds shall be included here

Part I: Summary		FFY of Grant: 2011	
PHA Name: St. Clair County Housing Authority		FFY of Grant Approval 2011	
Grant Type and Number Capital Fund Program Grant No: IL06P030501-11 Replacement Housing Factor Grant No: Date of CFFP:		LOCCS Jan 2013 Rev . 3	
Type of Grant <input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input checked="" type="checkbox"/> Revised Annual Statement (revision no: 3) <input type="checkbox"/> Performance and Evaluation Report for Period Ending: <input type="checkbox"/> Final Performance and Evaluation Report			
Summary by Development Account		Total Estimated Cost	
Line		Original	Revised
		Obligated	Expended
18a	1501 Collateralization or Debt Service paid by the PHA		
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment		
19	1502 Contingency (may not exceed 8% of line 20)		
20	Amount of Annual Grant:: (sum of lines 2-19)	1,414,035.00	1,414,035.00
21	Amount of line 20 Related to LBP Activities		
22	Amount of line 20 Related to Section 504 Activities		
23	Amount of line 20 Related to Security - Soft costs		
24	Amount of line 20 Related to Security - Hard Costs		
25	Amount of line 20 Related to Energy Conservation Measures		
Signature of Executive Director		Signature of Public Housing Director	
Date		Date	

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Part II: Supporting Pages		Federal FFY of Grant: 2011									
PHA Name: St. Clair County Housing Authority		Capital Fund Program Grant No: IL06P030501-11									
CFFP (Yes/No):		Replacement Housing Factor Grant No:									
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work			
				Original	Revised	Funds Obligated	Funds Expended	Funds Obligated	Funds Expended		
IL03000022 Centreville (60)	HVAC	1465	87	430,000.00	389,701.31	327,673.55					
IL03000022 Centreville (60)	Mechanical Room Renovations, Dryer Vents	1460	87	101,000.00	191,792.45	191,792.45					
IL03000052 Belleville (27)	Window replacement, exterior building improvements	1460	64	200,000.00	121,975.55	121,976.00	121,975.55	121,975.55	Complete		
IL03000022 Centreville (60)	Exterior Building Improvements	1460	87	0.00	270,006.00	70,000.00	68,137.50				
IL03000061 Washington Park (17)	Site Improvements	1450	1	10,000.00	11,000.00	11,000.00	11,000.00	11,000.00	Complete		
IL03000062 Marissa (02)	Site Improvements	1450	1	4,422.00	4,422.00	4,422.00	4,422.00	4,422.00	Complete		
IL03000062 Marissa (07)	Site Improvements	1450	1	3,000.00	3,000.00	3,000.00	3,000.00	3,000.00	Complete		
IL03000062 Lenzburg (19)	Site Improvements	1450	1	5,000.00	6,000.00	6,000.00	6,000.00	6,000.00	Complete		
IL03000062 Millstadt (22)	Site Improvements	1450	1	10,000.00	10,128.00	10,128.00	10,128.00	10,128.00	Complete		
IL03000022 Centreville (60)	Construction Supervision and Inspection Costs: HVAC	1465		7,000.00	7,000.00						
IL03000022 Centreville (60)	Construction Supervision and Inspection Costs: Mech Room Reno, Dryer Vents	1460		3,000.00	3,000.00						
IL03000052 Belleville (27)	Construction Supervision and Inspection Costs: Window Repl, Ext Build Impv	1460		4,000.00	4,000.00						
IL03000061 Washington Park (17)	Construction Supervision and Inspection Costs: Site Improvements	1450		1,000.00	0.00						
IL03000062 Lenzburg (19)	Construction Supervision and Inspection Costs: Site Improvements	1450		1,000.00	0.00						
IL03000062 Millstadt (22)	Construction Supervision and Inspection Costs: Site Improvements	1450		1,000.00	872.00						
IL03000010 Brooklyn (01)	Exterior Building Improvements	1460	23	0.00	30,750.00	30,750.00	7,785.00				
IL03000010 Brooklyn (12)	Exterior Building Improvements	1460	8	0.00	6,290.00	6,290.00	6,290.00				
IL03000010 Brooklyn (01)	Construction Supervision and Inspection Costs: Ext Bldg Improvements	1450		0.00	1,000.00						

Part II: Supporting Pages		Federal FFY of Grant: 2011		January 2013 Rev 3		Status of Work	
PHA Name: St. Clair County Housing Authority		Grant Type and Number Capital Fund Program Grant No: IL06P030501-11 CFFP (Yes/No): Replacement Housing Factor Grant No:		Total Estimated Cost		Total Actual Cost	
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Original	Revised	Funds Obligated	Funds Expended
PH Wide	Administration	1410		141,403.00	141,404.00	141,404.00	141,404.00
PH Wide	Architect and Engineer	1430		68,000.00	68,032.00	68,032.00	65,480.80
PH Wide	Operating	1406		282,807.00	0.00	0.00	
PH Wide	Management Improvements						
	Management Staff Professional Develop.	1408		3,000.00	3,000.00	3,000.00	3,000.00
	Resident Service Coord & Tech Support	1408		50,000.00	50,000.00	20,000.00	5,000.00
	Resident Council Development & Training	1408		12,000.00	12,000.00	0.00	
	Drug Elimination	1408		40,000.00	40,000.00	35,937.25	4,687.25
	Software	1408		2,500.00	2,500.00	869.47	869.47
	Hardware	1475		17,500.00	17,500.00	6,065.90	6,065.90
	Security Equipment	1475		16,403.00	18,661.69	18,661.69	18,661.69

1 To be completed for the Performance and Evaluation Report
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Part III: Implementation Schedule for Capital Fund Financing Program									
PHA Name: St. Clair County Housing Authority									
Development Number Name/PHA-Wide Activities	All Fund Obligated (Quarter Ending Date)		All Funds Expended (Quarter Ending Date)		Federal FFY of Grant: 2011				
	Original Obligation End Date	Actual Obligation End Date	Original Expenditure End Date	Actual Expenditure End Date	Reasons for Revised Target Dates				
ILO3000022 Centreville (60)	08/2/2013		08/2/2015						
ILO3000032 Centreville (6)	08/2/2013		08/2/2015						
ILO3000052 Belleville (27)	08/2/2013		08/2/2015						
ILO3000061 Washington Park (17)	08/2/2013		08/2/2015						
ILO3000062 Millstadt (22)	08/2/2013		08/2/2015						

1. Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended

Annual Statement/Performance and Evaluation Report

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 8/31/2011

Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

Part I: Summary

PHA Name: St. Clair County Housing Authority

Grant Type and Number
 Capital Fund Program Grant No: IL60P030501-12
 Replacement Housing Factor Grant No:
 Date of CFFP:

FFY of Grant: 2012
FFY of Grant Approval: 2012

LOCCS JAN 2013-Rev 1

Original Annual Statement Reserve for Disasters/Emergencies Revised Annual Statement (revision no: 1)
 Performance and Evaluation Report for Period Ending: Final Performance and Evaluation Report

Line	Summary by Development Account	Total Estimated Cost			Total Actual Cost	
		Original	Revised	Obligated	Expended	
1	Total non-CFP Funds					
2	1406 Operations (may not exceed 20% of line 21)	245,659.00	245,659.00	0.00	0.00	0.00
3	1408 Management Improvements	123,000.00	105,500.00	2,500.00	0.00	0.00
4	1410 Administration (may not exceed 10% of line 21)	127,329.00	127,329.00	127,329.00	127,329.00	127,329.00
5	1411 Audit					
6	1415 Liquidated Damages					
7	1430 Fees and Costs	60,000.00	66,794.00	66,794.00	46,813.46	
8	1440 Site Acquisition					
9	1450 Site Improvement					
10	1460 Dwelling Structures	296,306.00	284,512.00	269,472.00	84,976.18	
11	1465.1 Dwelling Equipment-Nonexpendable	385,000.00	385,000.00	0.00	0.00	0.00
12	1470 Non-dwelling Structures	36,000.00	41,000.00	0.00	0.00	0.00
13	1475 Non-dwelling Equipment		17,500.00	17,500.00	17,500.00	
14	1485 Demolition					
15	1492 Moving to Work Demonstration					
16	1495.1 Relocation Costs					
17	1499 Development Activities					

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 3 PHAs with under 250 units in management may use 100% of CRP Grants for operations
 4 RHF funds shall be included here

Part I: Summary

PHA Name: St. Clair County Housing Authority

Grant Type and Number
 Capital Fund Program Grant No: IL06E030501-12
 Replacement Housing Factor Grant No:
 Date of CFFP:

FFY of Grant: 2012
FFY of Grant Approval 2012

LOCCS JAN 2013-Rev 1

Original Annual Statement Reserve for Disasters/Emergencies Revised Annual Statement (revision number: 1)

Performance and Evaluation Report for Period Ending: Final Performance and Evaluation Report

Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost	
		Original	Revised	Obligated	Expended
18a	1501 Collateralization or Debt Service paid by the PHA				
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment				
19	1502 Contingency (may not exceed 8% of line 20)				
20	Amount of Annual Grant: (sum of lines 2-19)	1,273,294.00	1,273,294.00	483,595.00	276,618.64
21	Amount of line 20 Related to LBP Activities	0.00			
22	Amount of line 20 Related to Section 504 Activities	0.00			
23	Amount of line 20 Related to Security - Soft costs	40,000.00			
24	Amount of line 20 Related to Security - Hard Costs	0.00			
25	Amount of line 20 Related to Energy Conservation Measures	385,000.00			
Signature of Executive Director		Signature of Public Housing Director			Date

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Part II: Supporting Pages		Federal FFY of Grant: 2012		Jan 2013- Rev 1		
PHA Name: St. Clair County Housing Authority		Grant Type and Number Capital Fund Program Grant No: IL06P030501-12 CFFP (Yes/No):		Total Actual Cost		Status of Work
Development Number Name/PHA Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Funds Expended
				Original	Revised	
AMP 22 Centreville, IL (5CCHA30-60)	HVAC, Water heaters, mechanical renovations, dryer vents	1465	44	380,000.00	380,000.00	
AMP 22 Centreville, IL (5CCHA30-60)	Exterior Building Improvements, Siding & Canopy Replacement	1460	24	145,806.00	269,472.00	84,976.18
AMP 32 Centreville, IL (5CCHA30-06)	Exterior Building, Siding & Canopy Replacement	1460	15	142,500.00	0.00	Complete
AMP 31 Centreville, IL (5CCHA30-08)	Community/Management Building Roof Replacement	1470	1	35,000.00	40,000.00	
AMP 22 Centreville, IL (5CCHA30-60)	SUPERVISION: HVAC, Water heaters, mechanical renovations, dryer vents	1465		5,000.00	5,000.00	
AMP 22 Centreville, IL (5CCHA30-60)	SUPERVISION: Exterior Building Improvements, Siding & Canopy Replacement	1460		4,000.00	4,000.00	
AMP 32 Centreville, IL (5CCHA30-06)	SUPERVISION: Exterior Building, Siding & Canopy Replacement	1460		4,000.00	4,000.00	
AMP 31 Centreville, IL (5CCHA30-08)	SUPERVISION: Community/Management Building Roof Replacement	1470		1,000.00	1,000.00	
AMP 62 Duppo (5CCHA30-03)	Window replacement	1460			7,040.00	

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Part II: Supporting Pages		Grant Type and Number				Federal FFY of Grant: 2012							
PHA Name: St. Clair County Housing Authority		Capital Fund Program Grant No: IL06P030501-12				Jan 2013-Rev 1							
Development Number Name/PHA-Wide Activities		CFPP (Yes/No):											
General Description of Major Work Categories		Replacement Housing Factor Grant No:											
		Development Account No.		Quantity		Total Estimated Cost		Total Actual Cost		Status of Work			
						Original		Revised		Funds Obligated		Funds Expended	
PH Wide	Administration	1410				245,659.00	245,659.00	127,329	127,329.00		127,329.00		
PH Wide	Architect and Engineer	1430				60,000.00	66,794.00	66,794	66,794.00		45,813.46		
PH Wide	Operating	1406				127,329.00	127,329.00						
PH Wide	Management Improvements												
	Management Staff Professional Develop.	1408				3,000.00	3,000.00	2,500	2,500.00				
	Resident Service Coord & Tech Support	1408				50,000.00	50,000.00						
	Resident Council Development & Training	1408				10,000.00	10,000.00						
	Drug Elimination	1408				40,000.00	40,000.00						
	Software	1408				2,500.00	2,500.00						
	Computers & Electronic Equipment	1475				17,500.00	17,500.00	17,500	17,500.00		17,500.00		COMP

1 To be completed for the Performance and Evaluation Report
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U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 8/31/2011

Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 8/31/2011

Part III: Implementation Schedule for Capital Fund Financing Program							Federal FFY of Grant: 2012	
PHA Name: 5t. Clair County Housing Authority								
Development Number Name/PHA-Wide Activities	All Fund Obligated (Quarter Ending Date)		All Funds Expended (Quarter Ending Date)		Reasons for Revised Target Dates			
	Original Obligation End Date	Actual Obligation End Date	Original Expenditure End Date	Actual Expenditure End Date				
AMP 22 (30-60 Centreville)	3/12/2014		3/11/2016					
AMP 32 (30-06 Centreville)	3/12/2014		3/11/2016					
AMP 31 (30-08 Centreville)	3/12/2014		3/11/2016					
PHA Wide	3/12/2014		3/11/2016					

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**ATTACHMENT #8.2 – CAPITAL FUND PROGRAM
FIVE-YEAR ACTION PLAN**

**ATTACHMENT #8.3 – CAPITAL FUND PROGRAM
MANAGEMENT NEEDS ASSESSMENT AND FIVE YEAR ACTION PLAN FOR
MANAGEMENT IMPROVEMENTS**

The modernization work for the most recent funding year, 501-12, is in various stages of completion. Some of the work is under construction (Exterior Building Repair IL30-60, AMP 522) some is under contract waiting for the contractor to start (Roofing Community/Management Building IL30-08, AMP 531) and the remainder is in the bid process (HVAC and Mechanical Room Renovation/Dryer vents IL30-60, AMP 522).

Proposed future funding is outlined below. All future funding shown here is based upon previous funding levels and is subject to change, depending on the Federal Budget allocation.

AMP	PROPERTY	WORK ITEMS	DOLLARS
YEAR 1 – 2013			
00032	IL30-06 Centreville	HVAC, Mechanical Renovation, dryer vent	\$520,000
0032	IL30-06 Centreville	Flat Roof Coating	\$20,000
00022	IL30-80 Centreville	Window Replacement	\$52,306
00031	IL30-20 Centreville	Exterior Building Improvements and Roof Replacement	\$55,000
0052	IL30-18 Swansea	Exterior Building Improvements and Roof Replacement	\$70,000
Total			\$717,306
YEAR 2 – 2014			
00031	IL30-08 Centreville	Window Replacement	\$393,000
00041	IL30-11 Alorton	Exterior Building Improvements/Attic Insulation/Siding Renovations	\$228,000
0062	IL30-02 Marissa	Roof Replacement and Attic Insulation	\$58,000
0062	IL30-07 Marissa	Roof Replacement and Attic Insulation	\$38,306
Total			\$717,306
YEAR 3 – 2015			
0032	IL30-06 Centreville	Window Replacement	\$230,000
0022	IL30-60 Centreville	Window Replacement	\$364,000
0062	IL30-05 Smithton	Roof Replacement/Attic Insulation	\$40,000
0062	IL30-03 Dupo	Roof Replacement/Attic Insulation and Exterior Improvement	\$50,000

0010	IL30-09 Brooklyn	Site Improvements, Water line replacement	\$33,306
Total			\$717,306
YEAR 4 – 2016			
0021	IL30-10 Centreville	Window Replacement	\$400,000
0032	IL30-06 Centreville	Roof Replacement	\$180,000
0022	IL30-60 Centreville	Roof Replacement	\$300,000
0041	IL30-11 Alorton	Site Improvements, Resurface Drive	\$80,000
0052	IL30-27 Belleville	Site Improvements, ADA Improvements, Resurface Parking	\$80,000
0062	IL30-21 New Athens	Site Improvements, ADA Improvements, Resurface Parking	\$40,000
0062	IL30-13 New Athens	Roof Replacement	\$65,000
0062	IL30-21 New Athens	Roof Replacement	\$65,000
0061	IL30-24 O'Fallon	Roof Replacement	\$58,000
0061	IL30-14 Lebanon	Roof Replacement	\$100,000
0062	IL30-13 New Athens	Kitchen And Bath Renov.	\$180,000
0062	IL30-13 New Athens	ADA Modifications	\$40,000
0032	IL30-06 Centreville	High Rise Demolition	\$140,000
0052	IL30-27 Belleville	HVAC	\$250,000
0041	IL30-11 Alorton	Electrical Modifications	\$35,200
0010	IL30-01 Brooklyn	Electrical Modifications	\$80,000
0010	IL30-09 Brooklyn	Exterior Improvements	\$70,000
0032	IL30-06 Centreville	Electrical Modifications	\$40,800
0022	IL30-60 Centreville	Electrical Modifications	\$70,400
0031	IL30-08 Centreville	Electrical Modifications	\$100,800
0022	IL30-80 Centreville	Electrical Modifications	\$12,800
0021	IL30-10 Centreville	Electrical Modifications	\$80,800
0061	IL30-17 Washington Pk	Kitchen And Bath Renov.	\$352,000
0061	IL30-17 Washington Pk	Ada Modifications	\$24,000
0061	IL30-17 Washington Pk	Security Screens	\$14,000
Total			\$2,858,800.00
YEAR FIVE			
IL03000010	IL30-01 BROOKLYN	Interior Building Renovations	\$1,800,000
IL03000010	IL30-01 BROOKLYN	Exterior Building Renovations	\$15,000
IL03000010	IL30-01 BROOKLYN	Site Improvements	\$15,000
IL03000010	IL30-01 BROOKLYN	ADA Modifications	\$2,500
IL03000010	IL30-01 BROOKLYN	Security Upgrades	\$275,000
IL03000010	IL30-09 BROOKLYN	Interior Building Renov.	\$15,000

IL03000010	IL30-09 BROOKLYN	Exterior Building Renov.	\$80,000
IL03000010	IL30-09 BROOKLYN	Site Improvements	\$40,000
IL03000010	IL30-09 BROOKLYN	ADA Modifications	\$2,500
IL03000010	IL30-09 BROOKLYN	Security Upgrades	\$50,000
IL03000010	IL30-12 BROOKLYN	Interior Building Renov.	\$288,000
IL03000010	IL30-12 BROOKLYN	Exterior Building Renov.	\$60,000
IL03000010	IL30-12 BROOKLYN	Site Improvements	\$15,000
IL03000010	IL30-12 BROOKLYN	ADA Modifications	\$2,500
IL03000010	IL30-12 BROOKLYN	Security Upgrades	\$60,000
IL03000021	IL30-10 CENTREVILLE	Interior Building Renov.	\$1,980,000
IL03000021	IL30-10 CENTREVILLE	Exterior Building Renov.	\$15,000
IL03000021	IL30-10 CENTREVILLE	Site Improvements	\$400,000
IL03000021	IL30-10 CENTREVILLE	ADA Modifications	\$2,500
IL03000021	IL30-10 CENTREVILLE	Security Upgrades	\$60,000
IL03000022	IL30-60 CENTREVILLE	Interior Building Renov.	\$1,566,000
IL03000022	IL30-60 CENTREVILLE	Exterior Building Renov.	\$15,000
IL03000022	IL30-60 CENTREVILLE	Site Improvements	\$35,000
IL03000022	IL30-60 CENTREVILLE	ADA Modifications	\$2,500
IL03000022	IL30-60 CENTREVILLE	Security Upgrades	\$60,000
IL03000022	IL30-80 CENTREVILLE	Interior Building Renov.	\$288,000
IL03000022	IL30-80 CENTREVILLE	Exterior Building Renov.	\$15,000
IL03000022	IL30-80 CENTREVILLE	Site Improvements	\$3,000
IL03000022	IL30-80 CENTREVILLE	ADA Modifications	\$2,500
IL03000022	IL30-80 CENTREVILLE	Security Upgrades	\$10,000
IL03000031	IL30-08 CENTREVILLE	Interior Building Renov.	\$2,268,000
IL03000031	IL30-08 CENTREVILLE	Exterior Building Renov.	\$15,000
IL03000031	IL30-08 CENTREVILLE	Site Improvements	\$25,000
IL03000031	IL30-08 CENTREVILLE	ADA Modifications	\$2,500
IL03000031	IL30-08 CENTREVILLE	Security Upgrades	\$60,000
IL03000031	IL30-20 CENTREVILLE	Interior Building Renov.	\$140,000
IL03000031	IL30-20 CENTREVILLE	Exterior Building Renov.	\$100,000
IL03000031	IL30-20 CENTREVILLE	Site Improvements	\$15,000
IL03000031	IL30-20 CENTREVILLE	ADA Modifications	\$2,500
IL03000031	IL30-20 CENTREVILLE	Security Upgrades	\$20,000
IL03000032	IL30-06 CENTREVILLE	Interior Building Renov.	\$1,638,000
IL03000032	IL30-06 CENTREVILLE	Exterior Building Renov.	\$15,000
IL03000032	IL30-06 CENTREVILLE	Site Improvements	\$15,000
IL03000032	IL30-06 CENTREVILLE	ADA Modifications	\$2,500
IL03000032	IL30-06 CENTREVILLE	Security Upgrades	\$60,000
IL03000032	IL30-06 CENTREVILLE	Mechanical Upgrades	\$200,000
IL03000041	IL30-11 ALORTON	Interior Building Renov.	\$15,000
IL03000041	IL30-11 ALORTON	Exterior Building Renov.	\$15,000
IL03000041	IL30-11 ALORTON	Site Improvements	\$15,000
IL03000041	IL30-11 ALORTON	ADA Modifications	\$2,500
IL03000041	IL30-11 ALORTON	Security Upgrades	\$60,000
IL03000051	IL30-61 BELLEVILLE	Interior Building Renov.	\$15,000

IL03000051	IL30-61 BELLEVILLE	Exterior Building Renov.	\$15,000
IL03000051	IL30-61 BELLEVILLE	Site Improvements	\$15,000
IL03000051	IL30-61 BELLEVILLE	ADA Modifications	\$2,500
IL03000051	IL30-61 BELLEVILLE	Security Upgrades	\$5,000
IL03000051	IL30-61 BELLEVILLE	Mechanical Upgrades	\$15,000
IL03000051	IL30-16 BELLEVILLE	Interior Building Renov.	\$15,000
IL03000051	IL30-16 BELLEVILLE	Exterior Building Renov.	\$15,000
IL03000051	IL30-16 BELLEVILLE	Site Improvements	\$30,000
IL03000051	IL30-16 BELLEVILLE	ADA Modifications	\$2,500
IL03000051	IL30-16 BELLEVILLE	Security Upgrades	\$20,000
IL03000051	IL30-16 BELLEVILLE	Mechanical Upgrades	\$15,000
IL03000052	IL30-18 SWANSEA	Interior Building Renov.	\$15,000
IL03000052	IL30-18 SWANSEA	Exterior Building Renov.	\$40,000
IL03000052	IL30-18 SWANSEA	Site Improvements	\$15,000
IL03000052	IL30-18 SWANSEA	ADA Modifications	\$2,500
IL03000052	IL30-18 SWANSEA	Security Upgrades	\$60,000
IL03000052	IL30-27 BELLEVILLE	Interior Building Renov.	\$15,000
IL03000052	IL30-27 BELLEVILLE	Exterior Building Renov.	\$15,000
IL03000052	IL30-27 BELLEVILLE	Site Improvements	\$15,000
IL03000052	IL30-27 BELLEVILLE	ADA Modifications	\$2,500
IL03000052	IL30-27 BELLEVILLE	Security Upgrades	\$15,000
IL03000061	IL30-14 LEBANON	Interior Building Renov.	\$15,000
IL03000061	IL30-14 LEBANON	Exterior Building Renov.	\$130,000
IL03000061	IL30-14 LEBANON	Site Improvements	\$15,000
IL03000061	IL30-14 LEBANON	ADA Modifications	\$2,500
IL03000061	IL30-14 LEBANON	Security Upgrades	\$60,000
IL03000061	IL30-17 WASHINGTON PK	Interior Building Renov.	\$15,000
IL03000061	IL30-17 WASHINGTON PK	Exterior Building Renov.	\$15,000
IL03000061	IL30-17 WASHINGTON PK	Site Improvements	\$15,000
IL03000061	IL30-17 WASHINGTON PK	ADA Modifications	\$2,500
IL03000061	IL30-17 WASHINGTON PK	Security Upgrades	\$60,000
IL03000061	IL30-24 O'FALLON	Interior Building Renov.	\$15,000
IL03000061	IL30-24 O'FALLON	Exterior Building Renov.	\$70,000
IL03000061	IL30-24 O'FALLON	Site Improvements	\$15,000
IL03000061	IL30-24 O'FALLON	ADA Modifications	\$2,500
IL03000061	IL30-24 O'FALLON	Security Upgrades	\$15,000
IL03000062	IL30-02 MARISSA	Interior Building Renov.	\$15,000
IL03000062	IL30-02 MARISSA	Exterior Building Renov.	\$65,000
IL03000062	IL30-02 MARISSA	Site Improvements	\$15,000
IL03000062	IL30-02 MARISSA	ADA Modifications	\$2,500
IL03000062	IL30-02 MARISSA	Security Upgrades	\$60,000

IL03000062	IL30-03 DUPO	Interior Building Renov.	\$15,000
IL03000062	IL30-03 DUPO	Exterior Building Renov.	\$100,000
IL03000062	IL30-03 DUPO	Site Improvements	\$15,000
IL03000062	IL30-03 DUPO	ADA Modifications	\$15,000
IL03000062	IL30-03 DUPO	Security Upgrades	\$60,000
IL03000062	IL30-05 SMITHTON	Interior Building Renov.	\$15,000
IL03000062	IL30-05 SMITHTON	Exterior Building Renov.	\$40,000
IL03000062	IL30-05 SMITHTON	Site Improvements	\$15,000
IL03000062	IL30-05 SMITHTON	ADA Modifications	\$2,500
IL03000062	IL30-05 SMITHTON	Security Upgrades	\$40,000
IL03000062	IL30-07 MARISSA	Interior Building Renov.	\$15,000
IL03000062	IL30-07 MARISSA	Exterior Building Renov.	\$40,000
IL03000062	IL30-07 MARISSA	Site Improvements	\$15,000
IL03000062	IL30-07 MARISSA	ADA Modifications	\$2,500
IL03000062	IL30-07 MARISSA	Security Upgrades	\$20,000
IL03000062	IL30-13 NEW ATHENS	Interior Building Renov.	\$15,000
IL03000062	IL30-13 NEW ATHENS	Exterior Building Renov.	\$60,000
	IL30-13 NEW ATHENS	Site Improvements	\$15,000
IL03000062	IL30-13 NEW ATHENS	ADA Modifications	\$2,500
IL03000062	IL30-13 NEW ATHENS	Security Upgrades	\$60,000
IL03000062	IL30-19 LENZBURG	Interior Building Renov.	\$15,000
IL03000062	IL30-19 LENZBURG	Exterior Building Renov.	\$15,000
IL03000062	IL30-19 LENZBURG	Site Improvements	\$15,000
IL03000062	IL30-19 LENZBURG	ADA Modifications	\$2,500
IL03000062	IL30-19 LENZBURG	Security Upgrades	\$60,000
IL03000062	IL30-21 NEW ATHENS	Interior Building Renov.	\$288,000
IL03000062	IL30-21 NEW ATHENS	Exterior Building Renov.	\$15,000
IL03000062	IL30-21 NEW ATHENS	Site Improvements	\$65,000
IL03000062	IL30-21 NEW ATHENS	ADA Modifications	\$2,500
IL03000062	IL30-21 NEW ATHENS	Security Upgrades	\$60,000
IL03000062	IL30-22 MILLSTADT	Interior Building Renov.	\$324,000
IL03000062	IL30-22 MILLSTADT	Exterior Building Renov.	\$15,000
IL03000062	IL30-22 MILLSTADT	Site Improvements	\$15,000
IL03000062	IL30-22 MILLSTADT	ADA Modifications	\$2,500
IL03000062	IL30-22 MILLSTADT	Security Upgrades	\$60,000
IL03000062	IL30-28 LENZBURG	Interior Building Renov.	\$15,000
IL03000062	IL30-28 LENZBURG	Exterior Building Renov.	\$15,000
IL03000062	IL30-28 LENZBURG	Site Improvements	\$15,000
IL03000062	IL30-28 LENZBURG	ADA Modifications	\$2,500
IL03000062	IL30-28 LENZBURG	Security Upgrades	\$30,000
Total			\$14,420,500.00

**ATTACHMENT #8.3 - CAPITAL FUND PROGRAM
MANAGEMENT NEEDS ASSESSMENT AND FIVE YEAR ACTION PLAN FOR
MANAGEMENT IMPROVEMENTS**

Management Needs Assessment Capital Grant Program (CGP)

St. Clair County Housing Authority

General Description of Management Needs	Urgency of Need (1-5)	Preliminary Estimated PHA-Wide Cost
1. MANAGEMENT, FINANCIAL AND ACCOUNTING CONTROL SYSTEMS:		
A) Reduce Vacancies Continue implementation of maintenance improvement goals including better consolidation and transportation of maintenance staff to work sites.	1	\$0*
B) Reduce average vacant unit "turnover" time. Continue implementation of maintenance improvement goals including better consolidation and transportation of maintenance staff to work sites and improve PHAS score in this area.	1	\$0*
C) Reduce the TAR's for tenants in occupancy for developments which exceed 10% target.	1	\$0*
2. ADEQUACY AND QUALIFICATIONS OF PERSONNEL		
A) Professional development training for housing management staff. Training in various functional aspects of positions including property manager, recertification, computer operation and accounting.	2	\$15,000
B) Professional development training for technical services staff. Training in construction management, technical writing, cost estimating, etc.	2	\$0*
3. ADEQUACY AND EFFICIENCY OF RESIDENT PROGRAMS AND SERVICES; RESIDENT AND DEVELOPMENT SECURITY, ETC.		
A) Resident services coordination and technical support activities. Programming to improve the quality of life of adults & youths in public housing, including services to older persons, family, youth mentoring programs, encourage resident participation in job training and other self-improvement programs. Also need to obtain technical assistance necessary for periodic utility allowance/consumption monitoring and review and other analysis used to indirectly support resident services/programs and management operations.	2	\$250,000
B) Provide resident organizations with needed equipment to establish offices and provide skills training. Provide leadership development and technical training assistance to councils. Train in organization, operational issues, etc. Provide equipment and material to establish and maintain offices and work space. Training and development activities include Resident Advisory Board and Youth Leaders.	4	\$50,000
C) Drug elimination activities (Centreville, Brooklyn, Alorton & Washington Park). Provide comprehensive drug elimination strategy including proactive law enforcement, prevention programs, and public awareness.	2	\$200,000
D) Computer hardware & software and other electronic equipment to upgrade management information and other systems as necessary to ensure successful administration of CFP, adequate maintenance of modernization improvements, to comply with regulatory changes, achieve agency goals, enhance resident security, etc. [i.e. Compliance with PIC, EIV and other HUD required electronic submissions/data sharing requirements, efficient processing of maintenance work orders, use of video surveillance cameras, etc.]	2	\$100,000
*To be achieved without direct cost allocation to CGP.		
Total Preliminary Estimated HA-Wide Cost		\$615,000
Date Assessment Prepared		2/2013
Source(s) of Information:		
Public Housing Assessment System	Resident Feedback	
TARS reports	Regulatory Notices	
Prior Management Needs Assessment	Financial & Management Audits	
RAB Input		

2/8/2013

Public Housing Capital Fund Program
Management Improvements
Five Year Plan

Work Item Description	2013	2014	2015	2016	2017	Five Year Total
Management Staff Professional Development	\$3,000	\$3,000	\$3,000	\$3,000	\$3,000	\$15,000
Resident Service Coordination & Technical Support Activities	\$50,000	\$50,000	\$50,000	\$50,000	\$50,000	\$250,000
Resident Council Development & Training	\$10,000	\$10,000	\$10,000	\$10,000	\$10,000	\$50,000
Security, Crime Prevention / Elimination Programs & Activities	\$40,000	\$40,000	\$40,000	\$40,000	\$40,000	\$200,000
Computer Software	\$2,500	\$2,500	\$2,500	\$2,500	\$2,500	\$12,500
Sub-total	\$105,500	\$105,500	\$105,500	\$105,500	\$105,500	\$527,500
Computers & Electronic Equipment	\$17,500	\$17,500	\$17,500	\$17,500	\$17,500	\$87,500
	\$123,000	\$123,000	\$123,000	\$123,000	\$123,000	\$615,000

ATTACHMENT # 9 – STATEMENT OF HOUSING NEEDS

Attachment #9 - Statement of Housing Needs

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

The St. Clair County Housing Authority reviewed St. Clair County's Consolidated Plan (CP) for 2010 – 2014 to assess the housing needs of the families in its jurisdiction, which includes all of St. Clair County, excluding the City of East St. Louis.

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 household experienced more of a cost burden than did very low or low income households).
- Renter households are more cost burdened than homeowner households.
- Elderly households are the most cost burdened of all household types.

According to the CP, the renter households had the following household income breakdown:

Extremely Low	Very Low	Low
10,347	4,208	6,239

The CP identified the following housing needs of households with incomes at or below 30% of area median income.

- While approximately 77% of these households have one or more housing problems (such as cost burden, overcrowded, substandard housing), the primary housing problem for this group is cost burden.
- Seventy-five percent (75%) of these households are cost burdened to the extent that they pay more than 30% of their household income for housing.
- Approximately fifty-three percent (53%) are severely cost burdened, meaning that they pay more than 50% of their household income for housing.
- Sixty-seven percent (67%) of elderly households in this group were found to be cost burdened, while nearly forty-two percent (42%) were severely cost burdened.

- Large family renter households (those with five or more related members) experienced significant housing problems with eighty-nine percent (89%) having one or more housing problems, eighty-two percent (82%) having a cost burden, and fifty-six percent (56%) being severely cost burdened.

Very Low Income Households (30 – 50% of Median Income) reported similar housing problems, but with less severity. For example, only eleven percent (11%) was determined to be severely cost burdened. Low-Income Households (50 – 80% of Median Income) reported the fewest housing problems.

The CP relied on the 2008 American Community Survey for information related to persons with disabilities. The 2008 ACS identified 33,584 individuals in St. Clair County with a disability, including 3,641 who are individuals under 18 years of age, 17,442 individuals between 18 and 64, and 12,501 individuals who are age 65 or older.

The number of identified HIV cases peaked in 2008 (at 307), declining to 268 in 2009. The number of identified AIDS cases continued to increase each year from 2006 through 2009, when it reached 274.

The CP did not provide any further analysis or insight into the housing needs of persons with disabilities, including HIV / AIDS, other than to make the reasonable assumption that the housing needs for those with disabilities was at least equal to that of other households. Twenty-three percent of all households in the jurisdiction reported having at least one housing problem. Therefore, it was assumed that at least the same percentage of households with persons with a disability would experience at least one housing related problem.

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:

- The number of black, non-Hispanic households with incomes in the Very Low Income Range (30-50%) reporting any housing problem (67.3% compared to 49.4% for the total population);
- Low Income (50 to 80%) Hispanic households reporting any housing problem (42.8% compared to 23% of the total population);
- Asian households reporting any housing problem in both the Very Low (30-50%) and Low Income (50 – 80%) ranges (94.4% compared to 49.4% of the total population and 46.7% compared to 23% for the total population, respectively);
- Native American non-Hispanic households in the Very Low (30-50%) range having any housing problem (83.3% compared to 49.4% for the total population).

The CP did not further identify the type of housing problems reported by these minority populations. Since all of the disproportionate needs were identified in the two higher income ranges (Very Low and Low Income), it is reasonable to conclude that cost burden did not

constitute the primary reason for the increased housing needs among these minority groups. St. Clair County CP states that the...

“...County will continue to reach out to existing organizations working with Black, Native American, and Hispanic households and continue to produce quality, affordable housing available to all ethnic and racial groups. The County will also re-evaluate disproportionate housing needs after the 2010 Census and 2010 CHAS data are released, as the 2000 CHAS data may no longer accurately reflect the housing burdens of various racial and ethnic groups.”

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 2/1/13 included the following demographic breakdown.

	Number of Families	Percent of Families
Total Wait List	6,863	100%
Extremely Low Income	5,985	87%
Very Low Income	764	11%
Low Income	96	1%
Families w/ children	4,320	63%
Elderly Families	244	4%
Families w/ disability	1,179	17%
White households	1,221	18%
Black households	5,437	79%
Other – race / ethnicity *	239	3%
Hispanic households	165	2%

*Or none declared

The Section 8 HCVP wait list remains open with an estimated eight percent (8%) annual turnover rate (based upon the number of program participants who leave the program and replaced with an applicant from the wait list).

The wait list for the **Public Housing** program is site based, with eighteen separate sites. The consolidated wait list, with an unduplicated count (meaning that an applicant is counted only once no matter how many different locations they applied for), results in the following demographic breakdown.

	Number of Families	Percent of Families
Total Wait List	5,415	100%
Extremely Low Income	4,793	89%
Very Low Income	542	10%
Low Income	70	<1%
Families w/ children	3,256	60%
Elderly Families	294	5%
Families w/ disability	949	18%
White households	1,028	19%
Black households	4,218	78%
Other – race / ethnicity *	197	4%
Hispanic households	144	3%
0 & 1 Bedroom	1,982	37%
2 Bedroom	2,258	42%
3 Bedroom	1,011	19%
4 Bedroom	151	3%
5 Bedroom	13	< 1%

*Or none declared

All public housing wait lists remain open and the annual turnover is estimated at eighteen (18%) based upon the number of move-outs annually.

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). About ninety percent (90%) 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. Approximately eighteen percent (18%) of all applicant households report having a disability. Nearly eighty percent (80%) of all 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 as recognized by the 2000 Census.

SCCHA reviewed available data sets from the 2010 Census and found nothing to indicate that the housing needs of the jurisdiction and the consistency between the needs of the applicants (Section 8 and Public Housing) and the general population has changed significantly.

Reference Note: The "Housing" section of the St. Clair County Consolidated Plan 2010 to 2014 served as the basis of identifying the housing needs of households in the jurisdiction. A copy of the "Housing" portion 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 2013 Agency Plan Update.

ATTACHMENT # 9.1 – STRATEGY FOR ADDRESSING HOUSING NEEDS

Attachment 9-1
Statement of Strategy for Addressing Housing Needs

(1) Strategies

Need: Shortage of affordable housing for all eligible populations

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

- Employ effective maintenance and management policies to minimize the number of public housing units off-line
- Reduce turnover time for vacated public housing units
- Minimize “off line” time due to renovation / modernization of public housing units.
- Maintain or increase section 8 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.

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

Need: Specific Family Types: Families with Disabilities

Strategy 1: Target available assistance to Families with Disabilities:

- Seek 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.)

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

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

(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

ATTACHMENT #10-A
PROGRESS IN MEETING MISSION AND GOALS

ANNUAL PLAN *STATUS REPORT – FEBRUARY 2013*

Goal: Develop Asset Management Systems and adopt Project Based Budgeting Process to assess the financial performance and continued viability of each public housing “AMP” (or asset management project).

Status: *Continued Progress.* Public Housing Operating Budget compiled using Asset Management Approach (separate budgets established for each Public Housing Development groupings or “AMPs” and Central Office Cost Center (COCC). Major organizational change implemented July 1, 2012 to assign most of the maintenance staff to the supervision of the three Property Managers. Specialized maintenance services such as HV/AC, plumbing / sewer lines, and after-hours emergency services remain centralized under the Maintenance Director. Further refinement of internal procedures / processes will be necessary to achieve full compliance. Finance Department staff periodically consults with and seeks the counsel of a Certified Public Accountant (CPA) with extensive experience in training and auditing PHAs for asset-based management compliance for the purpose of achieving full compliance with statutory requirements. Although HUD continues to develop and issue compliance guidance materials substantial progress has been achieved.

Goal: Continue to utilize Capital Fund Program to upgrade / modernize the public housing stock.

Status: *Continued Progress.* Full obligation and expenditure of Capital Fund allocations within implementation dates achieved. Majority of Capital Fund expenditures during Fiscal Year Ending 2013 were designated for second phase of extensive exterior renovation project and HV/AC upgrades at the Private Mathison Manor (AMP 22). The majority of CFP funding anticipated this year will be targeted toward completion of the exterior improvements and HV/AC upgrades at the Centreville properties. The major work items projected in CFP Year 2 is window replacement in AMP 31 (Centreville - ESS), exterior building improvements at the Hawthorne property in Alorton (AMP 41), along with roof replacement and attic insulation at the Marissa properties.

Goal: Through partnerships with local law enforcement and prevention program service providers and other initiatives, reduce the level of drug-related crime in the targeted developments to a level equal to or less than the surrounding neighborhoods.

Status: *Limited Progress.* SCCHA enjoys cooperative relationships with the police departments in the targeted developments (Centreville, Alorton, and Brooklyn). Drug-related and other crimes remain a problem in the developments, but the primary cause is the general lack of resources available to local law enforcement. The local police are providing a level of service considered substantially equivalent to the surrounding neighborhoods, but it remains insufficient to adequately address the community-wide drug-related crime problem. SCCHA has achieved positive results by staffing a part-time “Law Enforcement Liaison” position to coordinate activities with local police departments and other law enforcement entities and to work cooperatively with probation

and parole officials to ensure that probationers and parolees (for drug related and/or violent crimes) are not released to public housing locations.

Goal: Improve security within developments, particularly those in Centreville, through utilization of security cameras with monitoring accomplished with the assistance of local law enforcement.

Status: *Notable Progress.* Security cameras have been installed in the Private Mathison Manor and Ernest Smith Sr. Apartment complexes, a total of eight in PMM and thirteen in ESSA. The cameras are fully operational with continuous monitoring capability at the on-site offices. Unfortunately, continuous monitoring at the management offices is not feasible due to staffing constraints (these are one-person offices). The Centreville Police Department has remote monitoring capability at their station. Surveillance cameras have proven useful in solving and deterring crime within the two developments. Additionally, SCCHA has completed installation of a first phase of cameras at the public housing locations in Brooklyn, Belleville (Amber Court) and O'Fallon, along with camera upgrades at the Bel-Plaza I & II buildings in Belleville through a Safety and Security Grant.

Goal: Enhance fire prevention safety through vigilant inspections by maintenance and management personnel and by the installation of stove top fire extinguisher units to reduce the number of cooking related fires.

Status: *Efforts Continue.* The installation of stove top fire extinguishers for gas stoves has been completed. Maintenance and management inspections continue, with many households targeted for accelerated inspections when conditions that increase the potential for fire are identified (greasy / dirty stove and/or range hood exhaust, extension cords, flammables in vicinity of gas-fired furnace or water heater, etc.). However, fire prevention is difficult and resident education is a long process. Outcomes are not within direct control of management and one accident or act of neglect on the part of a resident can have devastating results. Fire prevention efforts will continue.

Goal: Obtain HUD approval / renewal of designated housing plan (for elderly only, non-elderly disabled only, etc.).

Status: *Goal Achieved.* HUD approval of a two year extension of SCCHA's Designated Housing Plan was received.

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

Status: *Limited Progress.* SCCHA is successfully administering the public housing site based wait list program, including, but not limited to monitoring racial, ethnic or disability-related tenant composition at each PHA site. Arrangements have not been made for the use of independent testers (or other means satisfactory to HUD) to assure the site-based waiting list is not being administered in a discriminatory way and that no

patterns or practices of discrimination exist. Identifying qualified parties to carry out the independent testing and the associated costs have been the primary obstacles to achieving said goal.

Goal: Arrange for Fair Housing and Reasonable Accommodation Training for all staff involved in wait list, admissions and/or continued occupancy activities for any federal housing program administered.

Status: Goal Achieved. In-service training for all staff on this subject was held July 2009 and conducted by a representative from HUD's Office of Fair Housing and Equal Opportunity. Department Supervisors attended the Metro East Fair Housing Conference in April 2011. The Section 8 Program Director attended a Fair Housing session sponsored by the Illinois Association of Housing Authorities (IAHA) in April 2011. Most of the staff participated in a three hour Fair Housing and Reasonable Accommodation Training webinar sponsored by HUD during the final quarter of 2012. Additional fair housing / accommodation training will be undertaken as it becomes available.

FIVE-YEAR PLAN *STATUS REPORT – FEBRUARY 2013*

HUD Strategic Goal: Expand the supply of assisted housing by reducing public housing vacancies and leveraging private or other public funds to create additional housing opportunities.

Status: *Significant Progress.* The number of public housing vacancies decreased significantly from February 2010 to February 2011. There were forty-eight (48) vacant units February 2010. That number was reduced to sixteen (16) as of February 2011, representing a vacancy percentage of 1.6%. As of February 1, 2012, there were fourteen (14) public housing vacancies. This achievement was the result of a concentrated effort by the maintenance and management staff. Unfortunately, a variety of factors combined to culminate in a significant increase in the number of vacant public housing units by February 2013. As of this writing, public housing vacancies total thirty-one (31). It will be a challenge to improve the occupancy rate back to above the ninety-eight (98% or higher) mark, but SCCHA is committed to putting forth the best effort possible.

Affordable housing opportunities, particularly for the senior citizens, have expanded locally as several new federally-assisted and/or State administered tax-credit properties have come on-line in recent years. SCCHA will continue its efforts to increase the supply of affordable housing through cooperative efforts with public and private partners, when the opportunity is available.

HUD Strategic Goal: Improve the quality of assisted housing through: improved PHAS (Public Housing Assessment System) scores for public housing program and SEMAP (Section 8 Management Assessment Program) scores for Section 8 Program; increased customer satisfaction; renovating public housing units; and development of project-based budgeting and asset management approach to public housing operations.

Status: *Significant Progress Achieved.* PHAS scores have remained in the high 80's, resulting in "standard performer" designation. This includes the PHAS score received under the Interim Rule due for the FYE 6/30/11 which totaled 85. The score for FYE-6/30/12 has not yet been received. Vacancy days and unit turn-around time have historically been the major obstacles to achieving a higher PHAS score in the public housing program. A "high performer" designation under the SEMAP was achieved for the FYE-6/30/10 and maintained for FYE-6/30/11 and FYE-6/30/12. The staff is dedicated to maintaining high-performer status through-out the Agency Plan period.

Historically, Resident Assessment and Satisfaction Survey reports reflected high satisfaction rates in areas of maintenance and services. Scores in communication, safety and neighborhood appearance have traditionally remained below the 75% target level. A follow-up Plan was developed to increase satisfaction scores in these areas. The resident survey process has been suspended by HUD.

Full and timely obligation and expenditure of Capital Fund allocations have been achieved each year of the current five year plan and is expected to continue. The majority of Capital Fund grants from 2010 through 2012 allocations were designated to the extensive and multi-phase exterior improvement program designed to ensure continued long-term viability of the Private Mathison Manor (PMM) and Ernest Smith Sr. (ESS) developments in Centreville. The majority of the CFP funding anticipated to be received in 2013 will be targeted for completion of the exterior work at the Centreville properties.

Most aspects of the project-based budgeting and asset management approach to public housing operations were well developed and in place at the start of the current five year planning cycle. Further refinements and operational modifications are anticipated during this planning cycle as SCCHA works with HUD, financial auditors, and financial consultants to achieve full compliance.

HUD Strategic Goal: Increase assisted housing choices through provision of voucher mobility counseling, outreach efforts to potential voucher landlords, increase voucher payment standards above 100% of local FMRs (Fair Market Rents), and implementation of public housing site based waiting lists.

Status: *Mixed Results:* By the close of 2011 the Housing Choice Voucher Program (HCVP) was operating at full financial capacity. The same was true by the close of calendar year 2012. However, in an attempt to increase the number of households served to generate administrative fees minimally sufficient to maintain program operations, the payment standard has been maintained at approximately 100% of the established FMRs. HCVP participants receive voucher mobility counseling with the issuance of every voucher / Landlord Packet. Most outreach to landlords that do not currently participate in the HCVP is done by voucher holders---they are encouraged to search for the best possible housing by seeking out landlords that have not previously participated in the program. This often leads to the prospective landlord contacting program staff for additional information. Several new landlords have been brought into the program in this manner and given the inadequate administrative fee structure it is really the only viable option currently available for conducting landlord outreach. Continued successful administration of the public housing site based waiting list program was achieved during the 2012 – 2013 annual plan year. The site based wait list is considered a key factor in achieving the significant reduction in public housing vacancies.

HUD Strategic Goal: Improve community quality of life and economic vitality through implementation of: measures to de-concentrate poverty by bringing higher income public housing households into lower income developments; public housing security improvements; designation of developments for particular resident groups (household income level), and continued aggressive applicant screening and resident lease enforcement efforts.

Status: *Notable Progress.* The de-concentration analysis completed in February of 2011, 2012 and 2013 documented that no public housing properties had average household income levels outside the acceptable range (85% - 115% of average PHA-wide income). Surveillance cameras are now operational at multiple public housing locations, including Brooklyn, Centreville, Belleville and O'Fallon. Additional security cameras will be installed at these and other locations as funds become available. HUD approval of SCCHA's request to renew its Designation Plan was received July 2010. The plan was fully implemented before the start of the 2011 agency plan cycle. The Designation Plan is considered a vital component to successful management of SCCHA's public housing inventory. Senior citizens and younger persons with disabilities are divergent populations with different needs and lifestyles and are not compatible for mutual residency in high density multi-family housing properties. Aggressive applicant screening and resident lease enforcement efforts continued in the first three years of the agency plan cycle and will continue through the full cycle. Waiting list preferences were previously established for applicants who are employed and/or are in job training / education programs. To achieve greater administrative efficiencies and to recognize housing crisis other than rent burden, SCCHA has changed its public housing and Section 8 HCVP selection admission preferences in conjunction with the 2012 Agency Plan Update. The changes in the selection admission preferences were successfully implemented during the 2012 – 2013 plan cycle.

HUD Strategic Goal: Promote self-sufficiency and asset development of families and individuals by: increasing the number and percentage of employed persons in assisted housing developments; providing or attracting supportive services to improve assistance recipients' employability and/or to increase independence for the elderly or families with disability.

Status: *Limited Progress.* In February 2009 thirty-eight (38%) of public housing families had earned income. That number decreased to thirty-five percent (35%) in February 2010, declining further to thirty-four percent (34%) by February 2011. The percentage remained unchanged in February 2012 then increased to thirty-five percent (35%) in 2013. The decline is attributed to the national economic downturn and is consistent with the increase in the national, state and local unemployment rates. Hopefully, the small improvement recorded in 2013 is the start of a positive trend and evidence of an upswing in the local economy. 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. The primary purpose of the association with these organizations is to stay aware of job training / education programs and services available and to leverage increased participation of public housing residents in these programs. An example of the cooperative relationship between SCCHA and these entities is SCCHA office(s) being utilized as recruitment and registration sites for the Summer Youth Employment Program funded by the American Recovery and Reinvestment Act (ARRA), resulting in jobs for several public housing and Section 8

youth. Similarly, when the State of Illinois Department of Human Services (IDHS) initiated a subsidized job program for both adults and youth in households receiving TANF benefits, many public housing (and Section 8 HCVP) households participated in the program. The cooperative relationship between SCCHA and the organizations administering these programs locally (SCC-IGD and Lessie Bates Neighborhood House) facilitated the participation of many assisted resident households. Unfortunately, these valuable job training programs have since ended.

The Public Housing Service Coordinator works to meet the needs of elderly and families with disabilities to increase independence. The Service Coordination Program does an outstanding job and has received numerous awards and recognitions. The Family Self-Sufficiency (FSS) Program, a local initiative that served public housing residents was phased out in 2011. The phase-out was planned as part of a 2006 re-organization/downsizing effort made necessary by budget constraints.

HUD Strategic Goal: Ensure equal opportunity and affirmatively further fair housing by undertaking affirmative measures to ensure access to assisted housing and provide a suitable living environment for families living in assisted housing regardless of race, color, religion, national origin, sex, familial status, and disability.

Status: *Progress Achieved.* SCCHA continues to operate and/or administer all programs and services in a non-discriminatory manner. SCCHA staff received Fair Housing and Reasonable Accommodation training by a HUD staff member in July 2009. Departmental Supervisors attended fair housing training session(s) in April 2011. Most staff participated in a Fair Housing and Reasonable Accommodation webinar sponsored by HUD in the second half of 2012. SCCHA is committed to periodic fair housing and reasonable accommodation training for staff with in-service and other training in this area anticipated during the upcoming 2013-2014 plan cycle.

**ATTACHMENT #11 – 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 Programs to comply with 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.

2011 AGENCY PLAN UPDATE

SUMMARY OF PHA PLAN ELEMENTS

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

PART 2 – Financial Resources

PART 3 – Rent Determination Policies

PART 4 – Operation and Management

PART 5 – Grievance Procedures (Public Housing and Section 8 HCV Programs)

PART 6 – Designated Housing for Elderly and Disabled Families

PART 7 – Community Service and Self-Sufficiency

PART 8 – Safety and Crime Prevention

PART 9 – Pet Policy (Public Housing Program)

PART 10 – Civil Rights Certification

PART 11 – Fiscal Year Audit

PART 12 – Asset Management Statement and Table

PART 13 – Violence Against Women Act (VAWA) Statement and Policy Excerpts

PHA PLAN ELEMENT – PART 1
Policies Governing Eligibility, Selection, and 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). 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 to date and time of application. The admission selection preferences available include (*as proposed 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 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.

**Defined as any applicant seeking housing assistance that is not currently receiving or participating in a federal, state or local housing assistance program. Emergency shelters are not considered a housing assistance program.

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 written material
- 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. Section 8

(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). 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 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 proposed 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) **
- Law enforcement officers and teachers (actively employed) [6 preference points]
- 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, over the age of 62, or have a disability.

**Defined as any applicant seeking housing assistance that is not currently receiving or participating in a federal, state or local housing assistance program. Emergency shelters are not considered a housing assistance program.

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) 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.

**ST. CLAIR COUNTY HOUSING AUTHORITY
INCOME CONCENTRATION ANALYSIS
AGENCY PLAN UPDATE 2013**

2/9/2013

Development	Project	Average Income	Weighted Average	Adjusted Avg. Income	85% Threshold	115% Threshold	Within Range
PHA-WIDE		\$12,085	1.03	\$12,482	\$10,610	\$14,354	
Thomas Terry Apts.	001	\$11,828					
	009	\$11,438					
	Total	\$11,706	1.10	\$12,829			Y
Ernest Smith Sr.	006	\$10,665					
	008	\$9,983					
	Total	\$10,254	1.11	\$11,410			Y
Private Mathison Manor	010	\$10,603					
	060	\$11,069					
	080	\$8,452					
	Total	\$11,710	1.09	\$12,820			Y

Weighted Average Adjustment For Bedroom Size Distribution

	Occupie Efficiency Units	Efficiency Units (.70)	1-bedroom Units (0.85)	2-bedroom Units (1.00)	3-bedroom Units (1.25)	4-bedroom Units (1.40)	5-bedroom Units (1.61)
PHA-WIDE	970	4	349	319	242	44	12
Thomas Terry Apts.	138	0	24	59	40	11	4
Ernest Smith Sr. Apts.	202	0	51	45	91	7	8
Private Mathison Manor	213	0	17	111	75	10	0
PHA-Wide	$(4 \times .70) + (349 \times .85) + (319 \times 1) + (242 \times 1.25) + (44 \times 1.40) + (12 \times 1.61) / 970$						
	1.03	1.03					
Thomas Terry Apts.	$0 \times .70 + 24 \times .85 + 59 \times 1 + 40 \times 1.25 + 11 \times 1.40 + 4 \times 1.61 / 138$						
	1.10	1.10					
Ernest Smith Sr. Apts.	$0 \times .70 + 51 \times .85 + 45 \times 1 + 91 \times 1.25 + 7 \times 1.40 + 8 \times 1.61 / 202$						
	1.11	1.11					
Private Mathison Manor	$0 \times .70 + 16 \times .85 + 108 \times 1 + 69 \times 1.25 + 9 \times 1.40 + 0 \times 1.61 / 202$						
	1.09	1.09					

INCOME DE-CONCENTRATION WORKSHEET - APU 2013
(Occupancy Data as of 2/9/13)

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	100	96	76	79%	5045.00	50.3%
30-9	40	42	33	79%		
30-12 Brooklyn	15	15	11	73%		
30-19	8	8	7	88%	5040.02	12.2%
30-28 Lenzberg	8	8	6	75%		
30-2	18	17	15	88%		
30-7 Marissa	14	14	11	79%		
30-3 Dupo	20	20	15	75%	5031.01	14.8%
30-5 Smithton	10	10	5	50%	5039.00	6.4%
30-6	82	81	67	83%	5027.00	44.3%
30-8	126	121	106	88%		
30-20 Centreville	8	8	6	75%		
30-10	110	104	91	88%	5028.00	51.8%
30-60	85	82	71	87%		
30-80 Centreville	16	16	16	100%		
30-11 Alorton	44	44	35	80%	5025.00	58.7%
30-13	16	15	12	80%	5040.01	4.8%
30-21 New Athens	16	16	5	31%		
30-14 Lebanon	24	23	20	87%	5043.02	12.5%
30-16	38	37	25	68%	5016.01	8.8%
30-27 Belleville	64	64	41	64%		
30-17 Washinton Park	32	29	22	76%	5022.00	52.3%
30-18 Swansea	16	16	5	31%	3033.01	7.1%
30-22 Millstadt	18	18	13	72%	5032.03	6.4%
30-24 O'Fallon	20	20	12	60%	5043.05	4.1%
30-61 Belleville	48	47	26	55%	5019.00	11.0%

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

PHA PLAN ELEMENT – PART 2
Financial Resources

PHA PLAN ELEMENT – PART 2

Statement of Financial Resources

Federal regulations [24 CFR Part 903.7 9 (b)] require that a Statement of Financial Resources be included in the Annual Plan prepared by the local Public Housing Authority. The financial resources listed below are based upon approved budget amounts for the current fiscal year and open grant programs as of the date this document was prepared. For planning purposes, SCCCHA anticipates receiving the same level of funding, unless otherwise noted, for the upcoming fiscal year (Plan Year).

a) Current Year Federal Grants / Funding Allocations

- Public Housing Operating Fund \$ 3,690,000
- Public Housing Capital Fund Program (CFP) \$ 1,273,294 (501-12)
- Annual Contribution for Section 8 Tenant-Based Assistance \$ 930,592 (Admin. Fee)
\$ 9,544,500 (HAP)

b) Unobligated Prior Year Grants / Funding Allocations

- Capital Fund Program (501-11 – as of 01/31/13) \$ 337,033

c) Public Housing Dwelling Rental Income \$ 1,619,000

d) Other Income

- Interest Income \$ 2,500
- Miscellaneous (maintenance charges, laundry income, etc.) \$ 149,400

Total Resources **\$17,546,319**
=====

Date Prepared: 2/12/13

PHA PLAN ELEMENT – PART 3
Rent Determination Policies

PHA PLAN ELEMENT – PART 3

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 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 local newspaper
- Survey of similar unassisted units in the neighborhood

B. Section 8 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 area.

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

(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.

PHA PLAN ELEMENT --- PART 4
Operation and Management

PHA PLAN ELEMENT – PART 4
OPERATION AND MANAGEMENT

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

For efficiency and effective management, SCCHA is organized in to six functional departments: Administrative, Finance, Management (Public Housing), Maintenance; Modernization, and Section 8. The Information Technology (IT) staff operates under the auspices of the Deputy 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 the February 1, 2013 and estimated turnover for each program.

	Families Served	Projected Annual Turnover
Public Housing	971	@ 18%
Section 8 HCVP	1,664	@ 8%
Other *	47	@ 21%

*Includes Rural Development and Section 8 Projected Based Units

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)
- 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

PHA PLAN ELEMENT --- PART 5
Grievance Procedures

**PHA PLAN ELEMENT -- PART 5
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 5

SECTION 8 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.

PHA PLAN ELEMENT --- PART 6
Designated Housing for Elderly and Disabled Families

PHA PLAN ELEMENT – PART 6

Designated Housing for Elderly and Disabled Families

[24 CFR Part 903.7 9 (i)]

The St. Clair County Housing Authority (SCCHA) has applied for and received HUD approval of a “Designated Housing Plan” involving several public housing developments, as noted below.

Applicability: The “Plan” covers the public housing developments involving the designations listed in Table #1.

Table #1

<u>Development #</u>	<u>Location</u>	<u>Unit Count</u>	<u>Designation</u>
IL30-6 (partial)	Centreville	32	Elderly Only
IL30-16	Belleville	86	Elderly Only
IL30-18	Swansea	18	Elderly Only
IL30-21	New Athens	16	Elderly Only
IL30-27	Belleville	64	Elderly Only
IL30-13 (partial)	New Athens	4	Non-Elderly Disabled Only
IL30-14 (partial)	Lebanon	4	Non-Elderly Disabled Only
IL30-17 (partial)	Washington Park	20	Non-Elderly Disabled Only
IL30-19 (partial)	Lenzburg	4	Non-Elderly Disabled Only

It is noted that SCCHA shall continue to operate several “mixed population” developments as noted below in Table #2.

Table #2

<u>Development #</u>	<u>Location</u>	<u>Unit Count</u>	<u>Designation</u>
IL30-3	Dupo	6	Mixed Populations
IL30-5	Smithton	6	Mixed Populations
IL30-7	Marissa	14	Mixed Populations
IL30-20	Centreville	8	Mixed Populations

It is further noted that the developments listed in Table #3 include the specified number of one-bedroom units designated as “family” housing, which due to waiting list characteristics are expected to be occupied primarily by the young disabled population.

Table #3

<u>Development #</u>	<u>Location</u>	<u>Unit Count</u>	<u>Designation</u>
#30-1	Brooklyn	16	Family
#30-6	Centreville	8	Family
#30-8	Centreville	18	Family
#30-9	Brooklyn	8	Family
#30-10	Centreville	11	Family
#30-11	Alorton	6	Family
#30-12	Brooklyn	4	Family

The Designation Plan was originally approved by HUD May 20, 2005. Renewed approval was received May 1, 2010 and then again on March 26, 2012.

PHA PLAN ELEMENT --- PART 7
Community Service & Self-Sufficiency

PHA PLAN ELEMENT – PART 7

Community Service and Self-Sufficiency Program

[24 CFR Part 903.7 9 (I)]

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 rent determination policies
- Public housing admissions policies
- Section 8 admission 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 Centreville 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.

POLICY STATEMENT REGARDING COMMUNITY SERVICE AND CONTINUED OCCUPANCY

GENERAL

In order to be eligible for continued occupancy, each adult family member must either (1) contribute eight hours per month of community service (not including political activities) within the community in which the public housing development is located, or (2) participate in an economic self-sufficiency program unless they are exempt from this requirement.

EXEMPTIONS

The following adult family members of resident families are exempt from this requirement.

- A. Family members who are 62 or older
- B. Family members who are blind or disabled
- C. Family members who are the primary care giver for someone who is blind or disabled
- D. Family members engaged in work activity
- E. Family members who are exempt from work activity under part A title IV of the Social Security Act or under any other State welfare program, including the welfare-to-work program
- F. Family members receiving assistance under a State program funded under part A title IV of the Social Security Act or under any other State welfare program, including welfare-to-work and who are in compliance with that program

NOTIFICATION OF THE REQUIREMENT

The St. Clair County Housing Authority shall identify all adult family members who are apparently not exempt from the community service requirement.

The St. Clair County Housing Authority shall notify all such family members of the community service requirement and of the categories of individuals who are exempt from the requirement. The notification will provide the opportunity for family members to claim and explain an exempt status. The St. Clair County Housing Authority shall verify such claims.

The notification will advise families that their community service obligation will begin

upon the effective date of their first annual reexamination on or after 10/1/99. For family's paying a flat rent, the obligation begins on the date their annual reexamination would have been effective had an annual reexamination taken place. It will also advise them that failure to comply with the community service requirement will result in ineligibility for continued occupancy at the time of any subsequent annual reexamination.

VOLUNTEER OPPORTUNITIES

Community service includes performing work or duties in the public benefit that serve to improve the quality of life and/or enhance resident self-sufficiency, and/or increase the self-responsibility of the resident within the community.

An economic self-sufficiency program is one that is designed to encourage, assist, train or facilitate the economic independence of participants and their families or to provide work for participants. These programs may include programs for job training, work placement, basic skills training, education, English proficiency, work fare, financial or household management, apprenticeship, and any program necessary to ready a participant to work (such as substance abuse or mental health treatment).

The St. Clair County Housing Authority will coordinate with social service agencies, local schools, and the Human Resources Office in identifying a list of volunteer community service positions.

Together with the resident advisory councils, the St. Clair County Housing Authority may create volunteer positions such as hall monitoring, litter patrols, and supervising and record keeping for volunteers.

THE PROCESS

At the first annual reexamination on or after October 1, 1999, and each annual reexamination thereafter, the St. Clair County Housing Authority will do the following:

- A. Provide a list of volunteer opportunities to the family members.
- B. Provide information about obtaining suitable volunteer positions.
- C. Provide a volunteer time sheet to the family member. Instructions for the time sheet require the individual to complete the form and have a supervisor date and sign for each period of work.
- D. Assign family members to a volunteer coordinator who will assist the family members in identifying appropriate volunteer positions and in meeting their responsibilities. The volunteer coordinator will track the family member's progress monthly and will meet with the family member as needed to best encourage compliance.

- E. Thirty (30) days before the family's next lease anniversary date, the volunteer coordinator will advise the St. Clair County Housing Authority whether each applicable adult family member is in compliance with the community service requirement.

NOTIFICATION OF NON-COMPLIANCE WITH COMMUNITY SERVICE REQUIREMENT

The St. Clair County Housing Authority will notify any family found to be in noncompliance of the following:

- A. The family member(s) has been determined to be in noncompliance;
- B. That the determination is subject to the grievance procedure; and
- C. That, unless the family member(s) enter into an agreement to comply, the lease will not be renewed or will be terminated;

OPPORTUNITY FOR CURE

The St. Clair County Housing Authority will offer the family member(s) the opportunity to enter into an agreement prior to the anniversary of the lease. The agreement shall state that the family member(s) agrees to enter into an economic self-sufficiency program or agrees to contribute to community service for as many hours as needed to comply with the requirement over the past 12-month period. The cure shall occur over the 12-month period beginning with the date of the agreement and the resident shall at the same time stay current with that year's community service requirement. The first hours a resident earns goes toward the current commitment until the current year's commitment is made.

The volunteer coordinator will assist the family member in identifying volunteer opportunities and will track compliance on a monthly basis.

If any applicable family member does not accept the terms of the agreement, does not fulfill their obligation to participate in an economic self-sufficiency program, or falls behind in their obligation under the agreement to perform community service by more than three (3) hours after three (3) months, the St. Clair County Housing Authority shall take action to terminate the lease.

PHA PLAN ELEMENT --- PART 8
Safety & Crime Prevention

PHA PLAN ELEMENT – PART 8

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 authority
- Resident reports
- PHA employee reports
- Police reports

3. The following developments are most affected:

Ernest Smith Sr. – IL30-06A, 08A, and 20 (Centreville)
Private Mathison Manor – IL30-06B, 08B, and 10 (Centreville)
Hawthorne Terrace – IL30-011 (Alorton)
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 Centreville 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 Centreville are most affected by the activities described above.

PHA PLAN ELEMENT --- PART 9
Pet Policy

PHA PLAN ELEMENT – PART 9

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 Housing Authority. 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. All cats must have front paws declawed.

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 \$5, due with each month's rent payment. A refundable pet deposit of \$200 is required. The \$5 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. 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, residents residing in high-density developments are prohibited from owning a dog(s). High density is defined as 24 units or more on one continuous site or 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 a 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 it's 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 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.

PHA PLAN ELEMENT --- PART 10
Civil Rights Certification

**PHA Certifications of Compliance with the PHA Plans and Related Regulations:
Board Resolution to Accompany the PHA 5-Year and Annual PHA Plan**

*Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the ___ 5-Year and/or **XX** Annual PHA Plan for the PHA fiscal year beginning **July 1, 2013** ___, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) 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.
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 to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
3. The PHA certifies that there has been no change, significant or otherwise, to the Capital Fund Program (and Capital Fund Program/Replacement Housing Factor) Annual Statement(s), since submission of its last approved Annual Plan. The Capital Fund Program Annual Statement/Annual Statement/Performance and Evaluation Report must be submitted annually even if there is no change.
4. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Board or Boards in developing the Plan, and considered the recommendations of the Board or Boards (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.
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 Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
7. The PHA will affirmatively further fair housing by examining their programs or proposed programs, identify any impediments to fair housing choice within those programs, address those impediments in a reasonable fashion in view of the resources available and work 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.
8. For PHA Plan that includes 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 2006-24);
 - 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 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 waiting list is consistent with affirmatively furthering fair housing;
 - 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 part 903.7(c)(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. 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.
11. 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.

12. 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.
13. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
14. 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.
15. 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.
16. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
17. 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.
18. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments), 2 CFR Part 225, and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments).
19. 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.
20. 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.
21. 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.
22. The PHA certifies that it is in compliance with all applicable Federal statutory and regulatory requirements.

ST. CLAIR COUNTY HOUSING AUTHORITY

IL-030

PHA Name

PHA Number/HA Code

 5-Year PHA Plan for Fiscal Years 2011 - 2015

 X Annual PHA Plan for Fiscal Years 2013 - 2014

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: DAVID L. WAGNER

Title: EXECUTIVE DIRECTOR

Signature: TO BE SIGNED AFTER PUBLIC HEARING

Date

PHA PLAN ELEMENT --- PART 11
Last Completed Fiscal Year Audit

PHA PLAN ELEMENT --- PART 11
FISCAL YEAR AUDIT (FYE 6/30/11)

As evidenced by the attached excerpts from the Financial Audit completed for Fiscal Year Ending June 30, 2011, there were no audit findings or questionable costs.

ST. CLAIR COUNTY HOUSING AUTHORITY

**INDEPENDENT AUDITORS' REPORT,
FINANCIAL STATEMENTS AND
SUPPLEMENTAL INFORMATION
FOR THE YEAR ENDED
JUNE 30, 2011,
INCLUDING SINGLE AUDIT REPORTS
AND SUMMARY OF AUDITORS' RESULTS**

VELMA BUTLER & COMPANY, LTD.
Certified Public Accountants and Consultants

VB&C

INDEPENDENT AUDITOR'S REPORT



VELMA BUTLER & COMPANY, LTD.

CERTIFIED PUBLIC ACCOUNTANTS AND CONSULTANTS

MEMBER OF: THE AMERICAN INSTITUTE OF CPAs

THE ILLINOIS CPA SOCIETY

INDEPENDENT AUDITOR'S REPORT

Board of Commissioners
St. Clair County Housing Authority
Belleville, Illinois

U.S. Department of Housing and Urban
Development
Chicago Office
Ralph Metcalfe Federal Building
77 West Jackson Boulevard
Chicago, Illinois

We have audited the accompanying financial statements of the business-type activities, of St. Clair County Housing Authority (the Authority), for the year ended June 30, 2011. These financial statements are the responsibility of the Authority's management. Our responsibility is to express an opinion on these financial statements based on our audit

We conducted our audit in accordance with auditing standards generally accepted in the United States of America, and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement. An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the financial statements. An audit also includes assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation. We believe that our audit provides a reasonable basis for our opinion.

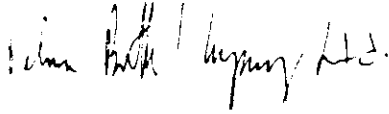
In our opinion, the financial statements referred to above present fairly, in all material respects, the respective financial position of the business-type activities of St. Clair County Housing Authority, as of June 30, 2011, and the respective changes in financial position and cash flows thereof for the year then ended in conformity with accounting principles generally accepted in the United States of America.

In accordance with *Government Auditing Standards*, we have also issued our report dated December 20, 2011, on our consideration of the Authority's internal control over financial reporting and our tests of its compliance with certain provisions of laws, regulations, contracts, grant agreements and other matters. The purpose of that report is to describe the scope of our testing of internal control over financial reporting and compliance and the results of that testing, and not to provide an opinion on the internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with *Government Audit Standards* and should be considered in assessing the results of our engagement.

In accordance with U.S. Office of Management and Budget (OMB) Circular A-133, *Audits of States, Local Government and Non-Profit Organizations* we have also issued our report dated December 20, 2011, on compliance with requirements applicable to each major program and internal control over compliance. That report is an integral part of an audit performed on the expenditure of federal awards and should be considered in assessing the results of our engagement.

The management's discussion and analysis and budgetary comparison information, on pages 3-7, are not a required part of the basic financial statements but are supplementary information required by the Governmental Accounting Standards Board. We have applied certain limited procedures, which consisted principally of inquiries of management regarding the methods of measurement and presentation of the required supplementary information. However, we did not audit the information and express no opinion on it.

Our audit was conducted for the purpose for forming an opinion on the financial statements taken as a whole. The accompanying financial data schedules as of June 30, 2011, are presented for purposes of additional analysis and are not a required part of the basic financial statements of the Authority. The accompanying schedule of expenditures of federal awards is presented for purposes of additional analysis as required by the U.S. Office of Management and Budget Circular A-133, *Audits of States, Local Governments and Non-Profit Organizations*, is also not a required part of the financial statements of St. Clair County Housing Authority. Such information has been subjected to the auditing procedures applied in the audit of the basic financial statements and, in our opinion, is fairly stated, in all material respects, in relation to the basic financial statements taken as a whole.



Velma Butler & Company, Ltd.
Chicago, Illinois

December 20, 2011

MANAGEMENT'S DISCUSSION AND ANALYSIS

ST. CLAIR COUNTY HOUSING AUTHORITY

1790 South 74th Street

Belleville, Illinois 62223

PHONE (618) 277-3290 FAX (618) 277-1806

To the Board of Commissioners of the
St. Clair County Housing Authority
Belleville, Illinois 62223

MANAGEMENT'S DISCUSSION AND ANALYSIS

This section of the St. Clair County Housing Authority (the "Authority") annual financial report presents management's discussion and analysis of the Authority's financial performance during the fiscal year that ended on June 30, 2011.

We are pleased to submit the financial statements of St. Clair County Housing Authority for the year ended June 30, 2011. The accuracy of the data presented in the financial statements, as well as its completeness and fairness of presentation, is the responsibility of management. All necessary disclosures to enable the reader to gain an understanding of the Authority's financial affairs have been included in the footnotes accompanying the general purpose financial statements. The purpose of the financial statements is to provide complete and accurate financial information, which complies with reporting requirements of the U.S. Department of Housing and Urban Development ("HUD") and the Governmental Accounting Standards Board.

FINANCIAL HIGHLIGHTS

- Net assets at June 30, 2011, totaled \$28 million and represent an increase of \$1.3 million from June 30, 2010 balance of \$26.7 million.
- Revenue increased by \$759 thousand during fiscal year 2011. The increase is primarily due to an increase in HUD Operating Grants.
- Operating expenses, excluding depreciation, increased slightly by \$224 thousand or by 1.4% to \$15.7 million at June 30, 2011, from \$15.5 million at June 30, 2010.
- Net capital assets were \$22.3 million at June 30, 2011, representing a increase of \$615 thousand from the June 30, 2010, balance of \$21.7 million. The increase is attributed to the completion of construction projects.
- Total liabilities decreased from \$1.4 million at June 30, 2010 to \$1.3 million, at June 30, 2011.

OVERVIEW OF THE FINANCIAL STATEMENTS

The Authority's basic financial statements are presented as a single enterprise fund whose operations include two separate and distinct housing programs, the low rent and housing choice voucher programs, and a blended component unit. The Low Rent Housing program is funded by income-based rents received from residents and operating subsidies from HUD.

Under the housing choice voucher program, the Authority enters into housing assistance payment contracts with eligible landlords. HUD pays housing assistance payments, which includes tenant rents and management fees for operating the program.

The financial statements are presented in three sections: management's discussion and analysis (this section), the basic financial statements and supplementary information.

The management's discussion and analysis section includes information on the past and future accomplishments of the Authority. It focuses on analysis of the financial statements and the improvements in the Authority's management.

The financial section provides both long-term and short-term information about the Authority's overall financial status. The financial statements also include notes that explain some of the information in the financial statements and provide more detailed data. The statements are followed by a section of other supplementary information that further explains and supports the information in the financial statements.

The Authority's financial statements are prepared in conformity with accounting principles generally accepted in the United States of America ("GAAP") as applied to government units.

Fund Financial Statements are groupings of accounts used to maintain control over resources segregated for specific activities or objectives. The Authority, like other state, local, or quasi-governments, uses fund accounting to ensure and demonstrate compliance with finance-related legal requirements. ~~The Authority's funds only consisted of a *Proprietary Fund*.~~

The Authority's *Proprietary Fund* is comprised of enterprise funds with "business-type" activities intended to recover all or a portion of their costs through fees and charges for services. Since the Authority maintains its activities in enterprise funds, its Proprietary Fund financial statements provide information about the activities of the Authority as a whole.

The bottom of the Statement of Revenue, Expenses and Changes in Net Assets reports on the Authority's net assets and how they have changed from the previous year. Net assets are the difference between the Authority's assets and liabilities, which is one way to measure the Authority's financial health or position.

Additionally, the Authority is required to undergo an annual single audit in conformity with the provisions of the Single Audit Amendments of 1996 and the United States Office of Management and Budget's (OMB) *Audits of States, Local Governments, and Non-Profit Organizations* as provided in OMB Circular A-133. Information related to this single audit, including a schedule of expenditures of federal awards, the independent auditor's reports on internal controls and compliance with applicable laws and regulations, and a schedule of findings and questioned costs will be issued with this report.

FINANCIAL ANALYSIS OF THE AUTHORITY

Net Assets

Net assets represent the difference between total assets and total liabilities. As shown in Table 1, the Authority's total net assets at June 30, 2011 increased by 4.8% to \$28 million.

Current assets increased by 8.1%, or approximately \$526 thousand. Non-current assets increased by \$615 thousand or 2.8% from \$21.7 million to \$22.3 million, as shown below.

Table 1
St. Clair County Housing Authority's Net Assets

	2011	2010	Difference	Percent Change
Current Assets	\$ 7,008,709	\$ 6,482,599	\$ 526,110	8.1%
Non-current Assets	<u>22,296,662</u>	<u>21,681,779</u>	614,883	2.8%
Total Assets	<u>\$ 29,305,371</u>	<u>\$ 28,164,378</u>	<u>\$ 1,140,993</u>	4.1%
Current Liabilities	\$ 827,887	\$ 941,536	\$ (113,649)	-12.1%
Non-current Liabilities	<u>465,085</u>	<u>492,649</u>	<u>(27,564)</u>	-5.6%
Total Liabilities	<u>1,292,972</u>	<u>1,434,185</u>	<u>(141,213)</u>	-9.8%
Invested in Capital Assets, Net	21,975,578	21,309,500	666,078	3.1%
Restricted	798,203	522,581	275,622	52.7%
Unrestricted	<u>5,238,618</u>	<u>4,898,112</u>	<u>340,506</u>	7.0%
Total Net Assets	<u>28,012,399</u>	<u>26,730,193</u>	<u>1,282,206</u>	4.8%
Total Liabilities and Net Assets	<u>\$ 29,305,371</u>	<u>\$ 28,164,378</u>	<u>\$ 1,140,993</u>	4.1%

Change In Net Assets

The change in net assets at June 30, 2011, was an increase of approximately \$1.3 million from \$26.7 million in fiscal year 2010 to \$28 million in fiscal year 2011. Net assets invested in capital assets; consist of investments in fixed assets and capital improvements net of accumulated depreciation, increased by \$666 thousand. Unrestricted and restricted net assets increased by about \$616 thousand.

Capital Assets

Capital assets increased by \$615 thousand from \$21.7 million at June 30, 2010 to \$22.3 million as shown on the table below:

	June 30, 2010	Additions and Transfers in	June 30, 2011
Land	\$ 4,731,990	\$	\$ 4,731,990
Building	32,404,345	(57,145)	32,347,200
Leasehold Improvements	34,542,824	3,164,518	37,707,342
Office Furniture and Equipment	1,098,342		1,098,342
Construction in Progress	3,503,172	(623,132)	2,880,040
Less Accumulated Depreciation	<u>(54,598,894)</u>	<u>(1,869,358)</u>	<u>(56,468,252)</u>
Total Fixed Assets	<u>\$ 21,681,779</u>	<u>\$ 614,883</u>	<u>\$ 22,296,662</u>

Construction costs during the year totaled \$2,321,583 and construction in progress at year-end totaled \$2,880,040. Leasehold improvements increased by \$3,164,518 and accumulated depreciation increased by the expense of \$1,869,358.

Revenue

As shown in Table 2, the Authority's total revenues, which included HUD Operating and Capital Grants, tenant rents, interest and other income increased by \$759 thousand or 4.2%.

Table 2
Changes in St. Clair County Housing Authority's Net Assets

	<u>2011</u>	<u>2010</u>	<u>Difference</u>	<u>Percent Change</u>
Operating Revenues	\$ 16,520,123	\$ 15,820,226	\$ 699,897	4.4%
Non-Operating Revenues	<u>2,322,602</u>	<u>2,263,101</u>	<u>59,501</u>	2.6%
Total Revenues	18,842,725	18,083,327	759,398	4.2%
Operating Expenses	15,691,161	15,467,135	224,026	1.4%
Depreciation	<u>1,869,358</u>	<u>2,180,193</u>	<u>(310,835)</u>	-14.3%
Total Expenses	17,560,519	17,647,328	(86,809)	-0.5%
Change in Net Assets	1,282,206	435,999	846,207	194.1%
Total Net Assets, Beginning	26,730,193	26,294,193	436,000	1.7%
Net Assets at End of Period	<u>\$ 28,012,399</u>	<u>\$ 26,730,192</u>	<u>\$ 1,282,207</u>	4.8%

Expenses

As shown in Table 3, the Authority's total expenses decreased by \$138 thousand or .78% to approximately \$17.6 million in 2011 from \$17.7 million in fiscal year 2010. A major decrease occurred in depreciation expense due to assets becoming fully depreciated in prior years.

Table 3
St. Clair County Housing Authority Operating Expense

Description	<u>2011</u>	<u>2010</u>	<u>Difference</u>	<u>Change</u>
Administrative	\$ 2,736,616	\$ 2,675,045	61,571	2.30%
Tenant	172,246	170,816	1,430	0.84%
Utilities	801,353	831,964	(30,611)	-3.68%
Ordinary Maintenance	2,224,272	2,163,109	61,163	2.83%
Protective Service	19,352	18,812	540	2.87%
General Expenses	357,022	332,446	24,576	7.39%
Other General Expenses	190,475	123,668	66,807	54.02%
Interest Expense	5,679	5,969	(290)	-4.86%
ExtraOrdinary Maintenance	11,609	2,953	8,656	293.13%
Housing Assistance Payments	9,172,537	9,192,590	(20,053)	-0.22%
Deprciation Expense	<u>1,869,358</u>	<u>2,180,917</u>	<u>(311,559)</u>	-14.29%
Total	<u>\$ 17,560,519</u>	<u>\$ 17,698,289</u>	<u>(137,770)</u>	-0.78%

BUDGETARY CONTROL

Budgetary control is exercised over programs through internal control methods that ensure compliance with legal provisions incorporated in annual program budgets approved by HUD and the Board of Commissioners. The activities of the Authority's enterprise fund are included in the annual budgeting process. Capital project budgets contained in the Authority's low rent housing program are adopted for the length of the capital projects then annualized to strengthen monitoring and completion benchmarks.

MAJOR INITIATIVES

SCCHA is involved in a number of major initiatives for the coming fiscal year:

We will be in pursuit of funding to rehabilitate our Cedar Ridge, 24 unit apartment complex in Lebanon, IL. That funding is sought from the Illinois Housing Development Authority and the Illinois Division of Rural Development. The complex is not part of SCCHA's public housing portfolio and therefore not eligible for rehabilitation through the Capital Fund Program administered by the U.S. Department of Housing and Urban Development.

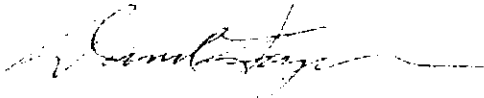
SCCHA is actively seeking a buyer for its 16 unit, Rural Family Housing Development in St. Libory, IL. The property's location has presented maintenance problems for SCCHA personnel and its sale would serve as a cost saving measure for the Agency.

SCCHA will continue to negotiate and cooperate with the St. Clair County Intergovernmental Grants Department in order to utilize Federal and State weatherization dollars for the developments within our jurisdiction. Our goal is to make our units more energy efficient and to maximize the impact of our Capital Fund Program.

It is our intent to complete and adopt a Disaster Plan governing procedures and providing guidance to residents and staff in the event of a wide array of disasters both natural and manmade.

We will pursue strategies to increase our physical inspection scores in order to facilitate even higher public housing assessment scores which could translate into additional funds for needed modernization projects.

Sincerely,



David L. Wagner
Executive Director

FINANCIAL STATEMENTS

ST. CLAIR COUNTY HOUSING AUTHORITY
STATEMENT OF NET ASSETS
JUNE 30, 2011

EXHIBIT A

	ENTERPRISE FUNDS			
	LOW RENT	SECTION 8	RURAL RENTAL	2011 TOTAL
ASSETS				
CURRENT ASSETS				
Cash and Cash Equivalents	\$ 4,833,165	\$ 1,248,014	\$ 202,609	\$ 6,283,788
Accounts Receivable, Net Allowance	338,959	152	9,120	348,231
Prepaid Expenses	174,911	2,883	3,645	181,439
Material Inventories, Net	195,251			195,251
Total Current Assets	<u>5,542,286</u>	<u>1,251,049</u>	<u>215,374</u>	<u>7,008,709</u>
NON-CURRENT ASSETS				
Land, Structures and Equipment, Net	<u>21,241,734</u>	<u>912,124</u>	<u>142,804</u>	<u>22,296,662</u>
Total Non Current Asstes	<u>21,241,734</u>	<u>912,124</u>	<u>142,804</u>	<u>22,296,662</u>
TOTAL ASSETS	<u>\$ 26,784,020</u>	<u>\$ 2,163,173</u>	<u>\$ 358,178</u>	<u>\$ 29,305,371</u>
LIABILITIES AND NET ASSETS				
CURRENT LIABILITIES				
Accounts Payable	\$ 702,302	\$ 27,964	\$ 13,282	\$ 743,548
Accrued Liabilities - Current	61,187	2,595	211	63,993
Notes Payable - Current			20,068	20,068
Deferred Revenue	278			278
Total Current Liabilities	<u>763,767</u>	<u>30,559</u>	<u>33,561</u>	<u>827,887</u>
NON-CURRENT LIABILITIES				
Notes Payable - Non Current			301,017	301,017
Accrued Liabilities - Non Current	<u>140,712</u>	<u>23,356</u>		<u>164,068</u>
Total Non-Current Liabilities	<u>140,712</u>	<u>23,356</u>	<u>301,017</u>	<u>465,085</u>
Total Liabilities	904,479	53,915	334,578	1,292,972
NET ASSETS				
Unrestricted Net Assets	4,637,807	398,931	201,880	5,238,618
Restricted Net Assets	-	798,203	-	798,203
Investment in Fixed Assets, Net of Related Debt	<u>21,241,734</u>	<u>912,124</u>	<u>(178,280)</u>	<u>21,975,578</u>
Total Net Assets	<u>25,879,541</u>	<u>2,109,258</u>	<u>23,600</u>	<u>28,012,399</u>
TOTAL LIABILITIES AND NET ASSETS	<u>\$ 26,784,020</u>	<u>\$ 2,163,173</u>	<u>\$ 358,178</u>	<u>\$ 29,305,371</u>

See accompanying notes to the financial statements.

**ST. CLAIR COUNTY HOUSING AUTHORITY
STATEMENT OF REVENUES, EXPENSES, AND CHANGE IN NET ASSETS
FOR THE YEAR ENDED JUNE 30, 2011**

EXHIBIT B

	ENTERPRISE FUNDS			2011 TOTAL
	LOW RENT	SECTION 8	RURAL RENTAL	
OPERATING REVENUES				
Tenant Rents	\$ 1,786,285	\$ 40,265	\$ 82,793	\$ 1,909,343
HUD Operating Grants	3,946,262	10,451,796		14,398,058
Other Government Grants			113,060	113,060
Other Income	45,654	53,516	492	99,662
TOTAL OPERATING REVENUES	5,778,201	10,545,577	196,345	16,520,123
OPERATING EXPENSES				
Administrative Expenses	2,139,019	594,301	3,296	2,736,616
Tenant Services	171,846	400		172,246
Utilities Expenses	775,876	11,050	14,427	801,353
Ordinary Maintenance	2,159,225	42,074	22,973	2,224,272
Protective Services	19,352			19,352
General Expenses	325,489	24,834	6,699	357,022
Other General Expense	182,770	4,442	3,263	190,475
Interest Expense		808	4,871	5,679
Casualty Losses	11,609			11,609
Housing Assistance Payments		9,172,537		9,172,537
Depreciation Expense	1,815,415	44,151	9,792	1,869,358
TOTAL OPERATING EXPENSES	7,600,601	9,894,597	65,321	17,560,519
OPERATING INCOME (LOSS)	(1,822,400)	650,980	131,024	(1,040,396)
NON-OPERATING REVENUES (EXPENSES)				
Interest Income	780	210	29	1,019
HUD Capital Grants	2,321,583			2,321,583
NON-OPERATING REVENUES (EXPENSES)	2,322,363	210	29	2,322,602
INTER-COMPANY REVENUES (EXPENSES)				
Allocated Overhead Revenue	3,366,800			3,366,800
Allocated Overhead Expense	2,966,700	339,588	60,512	3,366,800
Interfund Elimination	(54,966)	47,998	6,968	-
INTER-COMPANY REVENUES (EXPENSES)	345,134	(291,590)	(53,544)	-
CHANGE IN NET ASSETS	845,097	359,600	77,509	1,282,206
NET ASSETS AT BEGINNING OF PERIOD	25,034,444	1,749,658	(53,909)	26,730,193
NET ASSETS AT END OF PERIOD	\$ 25,879,541	\$ 2,109,258	\$ 23,600	\$ 28,012,399

See accompanying notes to the financial statements.

**ST. CLAIR COUNTY HOUSING AUTHORITY
STATEMENT OF CASH FLOWS
FOR THE YEAR ENDED JUNE 30, 2011**

EXHIBIT C

2011

CASH FLOWS FROM OPERATING ACTIVITIES

Receipts from Tenants and Others	\$	18,842,725
Payments to Employees		(2,892,332)
Payments to Vendors and Suppliers		(15,147,427)
Net Cash Provided by Operating Activities		<u>802,966</u>

CASH FLOWS FROM INVESTING ACTIVITIES

Interest Income		<u>1,019</u>
Net Cash (Used In) Provided by Investing Activities		<u>1,019</u>

CASH FLOWS FROM CAPITAL AND RELATED FINANCING ACTIVITIES

Capital Grants		2,321,583
Purchase of Capital Assets		(2,432,971)
Payments on Notes Payable		(51,195)
Net Cash (Used In) Provided by Capital and Related Activities		<u>(162,583)</u>

NET (DECREASE) INCREASE IN CASH AND CASH EQUIVALENTS 641,402

CASH AND CASH EQUIVALENTS AT BEGINNING OF FISCAL YEAR 5,642,386

CASH AND CASH EQUIVALENTS AT END OF FISCAL YEAR \$ 6,283,788

Reconciliation of Operating Loss to Net Cash

Used by Operating Activities		
Net Income	\$	(1,040,396)
Adjustments To Reconcile		
Depreciation		1,869,358
Change in Assets and Liabilities		
(Increase)/Decrease in Accounts Receivable		154,101
(Increase)/Decrease in Material Inventory		(28,346)
(Increase)/Decrease in Prepaid Expenses		(10,500)
Increase/(Decrease) in Accounts Payable		(88,078)
Increase/(Decrease) in Accrued Liabilities		11,570
Increase/(Decrease) in Tenant Security Deposits		7,837
Increase/(Decrease) in Notes Payable		(51,195)
Increase/(Decrease) in Interest Receivable		(37)
Increase/(Decrease) in Other Liabilities		(9,979)
Increase/(Decrease) in Deferred Revenues		(11,369)
Net Cash Provided by Operating Activities	\$	<u>802,966</u>

SUPPLEMENTAL DISCLOSURES OF NONCASH ACTIVITIES

Interest Paid During the Year	\$	<u>52,318</u>
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See accompanying notes to the financial statements.

SINGLE AUDIT REPORTS



VELMA BUTLER & COMPANY, LTD.

CERTIFIED PUBLIC ACCOUNTANTS AND CONSULTANTS

MEMBER OF: THE AMERICAN INSTITUTE OF CPAs

THE ILLINOIS CPA SOCIETY

**Report on Internal Control Over Financial Reporting and on Compliance and
Other Matters Based on an Audit of Financial Statements Performed
In Accordance with Government Auditing Standards**

Board of Commissioners
St. Clair County Housing Authority
Belleville, Illinois

U.S. Department of Housing and Urban
Development
Chicago Office
Ralph Metcalfe Federal Building
77 West Jackson Boulevard
Chicago, Illinois

We have audited the financial statements of the business-type activities, of St. Clair County Housing Authority (the Authority) as of and for the year ended June 30, 2011, and have issued our report thereon dated December 20, 2011. We conducted our audit in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States.

Internal Control Over Financial Reporting

In planning and performing our audit, we considered the Authority's internal control over financial reporting as a basis for designing our auditing procedures for the purpose of expressing our opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the Authority's internal control over financial reporting. Accordingly, we do not express an opinion on the effectiveness of the Authority's internal control over financial reporting.

A deficiency in internal control exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent or detect and correct misstatements on a timely basis.

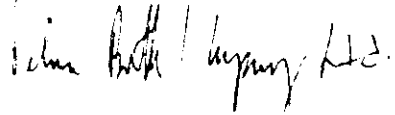
A material weakness is a deficiency, or combination of deficiencies, in internal control such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented, or detected and corrected on a timely basis.

Our consideration of the internal control over financial reporting was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control over financial reporting that might be deficiencies, significant deficiencies, or material weaknesses. We did not identify any deficiencies in internal control over financial reporting that we consider to be material weaknesses, as defined above.

Compliance and Other Matters

As part of obtaining reasonable assurance about whether the Authority's financial statements are free of material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts and grant agreements, noncompliance with which could have a direct and material effect on the determination of financial statement amounts. However, providing an opinion on compliance with those provisions was not an objective of our audit, and accordingly, we do not express such an opinion. The results of our tests disclosed no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standard*.

This report is intended solely for the information and use of the Board of Directors, management, others within the organization and federal awarding agencies and pass-through entities and is not intended to be and should not be used by anyone other than these specified parties.



Velma Butler & Company, Ltd.
Chicago, Illinois

December 20, 2011



**Report on Compliance With Requirements That Could Have a Direct
And Material Effect on Each Major Program and on Internal Control
Over Compliance in Accordance With OMB Circular A-133**

Independent Auditor's Report

Board of Commissioners
St. Clair County Housing Authority
Belleville, Illinois

U.S. Department of Housing and Urban
Development
Chicago Office
Ralph Metcalfe Federal Building
77 West Jackson Boulevard
Chicago, Illinois

Compliance

We have audited the compliance of St. Clair County Housing Authority (the Authority) with the types of compliance requirements described in the *U.S. Office of Management and Budget (OMB) Circular A-133 Compliance Supplement* that are applicable to each of its major federal programs for the year ended June 30, 2011. The Authority's major federal programs are identified in the summary of auditor's results section of the accompanying schedule of findings and questioned costs. Compliance with the requirements of laws, regulations, contracts and grants applicable to each of its major federal programs is the responsibility of the Authority's management. Our responsibility is to express an opinion on the Authority's compliance based on our audit.

We conducted our audit of compliance in accordance with auditing standards generally accepted in the United States of America; the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States; and OMB Circular A-133, *Audits of States, Local Governments and Non-Profit Organizations*. Those standards and OMB Circular A-133 require that we plan and perform the audit to obtain reasonable assurance about whether noncompliance with the types of compliance requirements referred to above that could have a direct and material effect on a major federal program occurred. An audit includes examining, on a test basis, evidence about the Authority's compliance with those requirements and performing such other procedures as we considered necessary in the circumstances. We believe that our audit provides a reasonable basis for our opinion. Our audit does not provide a legal determination on the Authority's compliance with those requirements.

In our opinion, the Authority complied in all material respects, with the requirements referred to above that are applicable to each of its major federal programs for the year ended June 30, 2011.

Internal Control Over Compliance

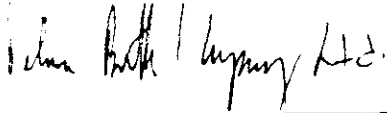
Management of the Authority is responsible for establishing and maintaining effective internal controls over compliance with requirements of laws, regulations, contracts and grants applicable to federal programs. In planning and performing our audit, we considered the Authority's internal controls over compliance with requirements that could have a direct and material effect on a major federal program in order to determine our auditing procedures for the purpose of expressing our opinion on compliance and to test and report on internal controls over compliance in accordance with OMB Circular A-133, but not for the purpose of expressing an opinion on the effectiveness of internal control over compliance. Accordingly, we do not express an opinion on the effectiveness of the Authority's internal control over compliance.

A deficiency in internal control over compliance exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent or detect noncompliance with a type of compliance requirement of a federal program on a timely basis. A *material*

weakness over internal control over compliance is a deficiency, or combination of deficiencies, in internal control over compliance, such that there is a reasonable possibility that material noncompliance with a type of compliance requirement of a federal program, will not be prevented, or detected and corrected, on a timely basis.

Our consideration of the internal controls over compliance was for the limited purpose described in the first paragraph of this section and was not design to identify all deficiencies in internal control over compliance that might be deficiencies, significant deficiencies or material weaknesses. We did not identify any deficiencies in internal control over compliance that we consider to be a material weakness, as defined above.

This report is intended solely for the information and use of the Board of Directors, management, others within the organization and federal awarding agencies and pass-through entities and is not intended to be and should not be used by anyone other than these specified parties.



Velma Butler & Company, Ltd.
Chicago, Illinois

December 20, 2011

SCHEDULE OF FINDINGS AND QUESTIONED COST

**ST. CLAIR COUNTY HOUSING AUTHORITY
SUMMARY OF AUDITOR'S RESULTS
FOR THE YEAR ENDED JUNE 30, 2011**

Section I - Summary of Auditors' Results

Financial Statements

The type of report issued: **Unqualified**

Internal control over financial reporting:

Material weakness(es) identified? Yes No

Deficiencies identified not considered to be material weaknesses?
 Yes None reported

Noncompliance material to financial statements noted?
 Yes None reported

Federal Awards

Internal control over major programs:

Material weakness(es) identified? Yes No

Deficiencies identified not considered to be material weaknesses?
 Yes None reported

Type of auditors' report issued on compliance for major programs: **Unqualified**

Any audit findings disclosed that are required to be reported in accordance with Circular A-133, Section .510(a)?
 Yes No

Identification of major program:

U.S. Department of Housing and Urban Development

<u>CFDA Number</u>	<u>Name of Federal Program</u>
Low Rent Rental Assistance Programs	
14.850	Low Rent Housing
14.872	Capital Fund Programs
14.885	Capital Fund Stimulus Grant

Housing Choice Voucher Housing Assistance Programs	
14.871	Housing Choice Voucher Program

Dollar threshold used to distinguish between Type A and Type B programs: \$ 300,000

Auditee qualified as low-risk auditee? Yes No

**ST. CLAIR COUNTY HOUSING AUTHORITY
SCHEDULE OF FINDINGS AND QUESTIONED COSTS
FOR THE YEAR ENDED JUNE 30, 2011**

Section II - Financial Statement Findings

There were no reportable findings for the fiscal year ended June 30, 2011.

Section III - Federal Award Findings and Questioned Costs

There were no reportable findings for the fiscal year ended June 30, 2011.

**ST. CLAIR COUNTY HOUSING AUTHORITY
STATUS OF PRIOR YEAR OF FINDINGS AND QUESTIONED COSTS
FOR THE YEAR ENDED JUNE 30, 2011**

Section IV - Summary of Prior Year Audit Findings

There were no reportable findings for the fiscal year ended June 30, 2010.

**ST. CLAIR COUNTY HOUSING AUTHORITY
STATEMENT OF COMPLIANCE WITH
SECTION 8 MANAGEMENT ASSESSMENT PROGRAM
FOR THE YEAR ENDED JUNE 30, 2011**

Velma Butler & Company, Ltd. audited the Authority's compliance with the Section 8 Housing Management Assessment Program and did not observe any material instances of noncompliance.

**ST. CLAIR COUNTY HOUSING AUTHORITY
STATEMENT OF COMPLIANCE WITH
PUBLIC HOUSING ASSESSMENT PROGRAM
FOR THE YEAR ENDED JUNE 30, 2011**

Velma Butler & Company, Ltd. audited the Authority's compliance with the Public Housing Assessment System Program and did not note any material instances of noncompliance.

PHA PLAN ELEMENT --- PART 12
Asset Management

PHA PLAN ELEMENT – PART 12
ATTACHMENT O

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 - 2013

Development Identification		Activity Description									
Name, Number, and Location	Number and Type of units	Capital Fund Program Parts II and III Component 7a	Development Activities Component 7b	Demolition / Disposition Component 8	Designated housing Component 9	Conversion Component 10	Home-ownership Component 11a	Other (describe) Component 171			
#1 - Brooklyn	100	2,187,500	None Planned	None Planned	None Planned	None Planned	None Planned	DBA/CSA			
#2 - Marissa	18	\$215,500	None Planned	None Planned	None Planned	None Planned	None Planned	DBA/CSA			
#3 - Dupo	20	\$255,000	None Planned	None Planned	None Planned	None Planned	None Planned	DBA/CSA			
#5 - Smithton	10	\$152,500	None Planned	None Planned	None Planned	None Planned	None Planned	DBA/CSA			
#6 - Centreville	178	\$5,474,200	None Planned	32 Units - Year 4	32 units elderly only	None Planned	None Planned	DBA/CSA			
#7 - Marissa	14	\$130,806	None Planned	None Planned	None Planned	None Planned	None Planned	DBA/CSA			
#8 - Centreville	142	\$3,247,906	None Planned	None Planned	None Planned	None Planned	None Planned	DBA/CSA			
#9 - Brooklyn	42	\$290,806	None Planned	None Planned	None Planned	None Planned	None Planned	DBA/CSA			
#10 - Centreville	110	\$2,938,300	None Planned	None Planned	None Planned	None Planned	None Planned	DBA/CSA			
#11 - Alorton	44	\$450,700	None Planned	None Planned	None Planned	None Planned	None Planned	DBA/CSA			
#12 - Brooklyn	16	\$425,500	None Planned	None Planned	None Planned	None Planned	None Planned	DBA/CSA			
#13 - New Athens	16	\$437,500	None Planned	None Planned	4-1br disabled only	None Planned	None Planned	DBA/CSA			
#14 - Lebanon	24	\$322,500	None Planned	None Planned	4-1br disabled only	None Planned	None Planned	DBA/CSA			
#16 & #61 - Belleville	86	\$165,000	None Planned	None Planned	86 units elderly only	None Planned	None Planned	DBA/CSA			
#17 - Washington Park	32	\$497,500	None Planned	None Planned	20-1br disabled only	None Planned	None Planned	DBA/CSA			
#18 - Swansea	16	\$202,500	None Planned	None Planned	16 units elderly only	None Planned	None Planned	DBA/CSA			
#19 - Lenzburg	8	\$107,500	None Planned	None Planned	4-1br disabled only	None Planned	None Planned	DBA/CSA			
#20 - Centreville	8	\$332,500	None Planned	None Planned	None Planned	None Planned	None Planned	DBA/CSA			
#21 - New Athens	16	\$535,500	None Planned	None Planned	16 units elderly only	None Planned	None Planned	DBA/CSA			
#22 - Millstadt	18	\$416,500	None Planned	None Planned	None Planned	None Planned	None Planned	DBA/CSA			
#24 - O'Fallon	20	\$175,500	None Planned	None Planned	None Planned	None Planned	None Planned	DBA/CSA			
#27 - Belleville	64	\$392,500	None Planned	None Planned	64 units elderly only	None Planned	None Planned	DBA/CSA			
#28 - Lenzburg	8	\$77,500	None Planned	None Planned	None Planned	None Planned	None Planned	DBA/CSA			

¹ Development-based Accounting and Comprehensive Stock Assessment

PHA PLAN ELEMENT --- PART 13
Violence Against Women Act (VAWA) Policy

PHA PLAN ELEMENT --- PART 13
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.

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