

**St. Clair County
Housing Authority's
Five Year Agency Plan
Fiscal Years 2021 - 2025
&
Capital Fund Program
Five (5) Year Plan**

February 14, 2020

5-Year PHA Plan (for All PHAs)

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

OMB No. 2577-0226
Expires: 02/29/2016

Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families

Applicability. Form HUD-50075-5Y is to be completed once every 5 PHA fiscal years by all PHAs.

A.	PHA Information.
A.1	<p>PHA Name: <u>ST. CLAIR COUNTY HOUSING AUTHORITY</u> PHA Code: <u>#11-030</u></p> <p>PHA Plan for Fiscal Year Beginning: (MM/YYYY) <u>07/01/2020</u> PHA Plan Submission Type: <input checked="" type="checkbox"/> 5-Year Plan Submission <input type="checkbox"/> Revised 5-Year Plan Submission</p> <p>Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information on the PHA policies contained in the standard Annual Plan, but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official websites. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.</p> <p style="text-align: center;">SUMMARY OF PHA PLAN ELEMENTS</p> <p>PART 1 - Policies Governing Eligibility, Selection, Admissions (including De-Concentration and Wait List Procedures)</p> <p>PART 2 - Rent Determination Policies</p> <p>PART 3 - Operation and Management</p> <p>PART 4 - Grievance Procedures (Public Housing and Section 8 HCV Programs)</p> <p>PART 5 - Designated Housing for Elderly and Disabled Families</p> <p>PART 6 - Community Service and Self-Sufficiency</p> <p>PART 7 - Safety and Crime Prevention</p> <p>PART 8 - Pet Policy (Public Housing Program)</p> <p>PART 9 - Narrative Statement Regarding Prior Fiscal Year Audit</p> <p>PART 10 - Violence Against Women Act (VAWA) Statement and Policy Excerpts</p> <p>PART 11 - Smoke-Free Public Housing Policy</p> <p style="text-align: center;">AVAILABILITY OF PHA PLAN, PLAN ELEMENTS AND RELATED INFORMATION</p> <p>St. Clair County Housing Authority's (SCCHA's) PHA Plan, PHA Plan Elements and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public at the following locations:</p> <ul style="list-style-type: none"> • 1790 South 74th Street, Belleville, IL 62223 (SCCHA Main Office) • 511 South 6th Street, Brooklyn, IL 62207 (AMP 1 Site Management Office - Thomas Terry Apartments) • 500 Hinckley, Centreville, IL 62207 (AMP 2 Site Management Office - Private Mathison Manor) • 4731 Tudor, Centreville, IL 62207 (AMP 3 Site Management Office - Ernest Smith Sr. Apartments) • 4601 North Belt West, Belleville, IL 62226 (AMPs 4, 5 and 6 Scattered Site Management Office) <p>SCCHA's draft 5 Year PHA Plan and related documents are available on-line at SCCHA's website www.sccha.org.</p> <p>All members of the SCCHA Resident Advisory Board (RAB), which includes a representative from each recognized resident council, is provided a copy of the draft 5 year PHA Plan.</p> <p><input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below)</p>

	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program	
					PH	IICV
	Lead PHA:					
B.	5-Year Plan. Required for <u>all</u> PHAs completing this form.					
B.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. See Attachment #14 – Statement of Mission and 5 Year Plan Goals					
B.2	Goals and Objectives. Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low- income, very low- income, and extremely low- income families for the next five years. See Attachment #14 – Statement of Mission and 5 Year Plan Goals					
B.3	Progress Report. Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan. See Attachment #7 – Statement of Progress in Meeting Mission and Goals					
B.4	Violence Against Women Act (VAWA) Goals. Provide a statement of the PHA's goals, activities objectives, policies, or programs that will enable the PHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault, or stalking. See Plan Element Part 10 – VAWA Statement and Policy Excerpts					
B.5	Significant Amendment or Modification. Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan See Attachment #16 – Significant Amendment or Modification Statement					

B.6	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) provide comments to the 5-Year PHA Plan?</p> <p>Y N XX <input type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the 5-Year PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p>
B.7	<p>Certification by State or Local Officials.</p> <p><u>Form HUD 50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</u>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p> <p style="text-align: center;">See Attachment #9 – Certification by State or Local Official (Pending)</p>

Instructions for Preparation of Form HUD-50075-5Y 5-Year PHA Plan for All PHAs

A. PHA Information 24 CFR §903.23(4)(c)

A.1 Include the full PHA Name, PHA Code, , PHA Fiscal Year Beginning (MM/YYYY), PHA Plan Submission Type, and the Availability of Information, specific location(s) of all information relevant to the hearing and proposed PHA Plan.

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

B. 5-Year Plan.

B.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. (24 CFR §903.6(a)(1))

B.2 Goals and Objectives. Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low- income, very low- income, and extremely low- income families for the next five years. (24 CFR §903.6(b)(1)) For Qualified PHAs only, if at any time a PHA proposes to take units offline for modernization, then that action requires a significant amendment to the PHA's 5-Year Plan.

B.3 Progress Report. Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5- Year Plan. (24 CFR §903.6(b)(2))

B.4 Violence Against Women Act (VAWA) Goals. Provide a statement of the PHA's goals, activities objectives, policies, or programs that will enable the PHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault, or stalking. (24 CFR §903.6(a)(3))

B.5 Significant Amendment or Modification. Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan.

B.6 Resident Advisory Board (RAB) comments.

- (a) Did the public or RAB provide comments?
- (b) If yes, submit comments as an attachment to the Plan and describe the analysis of the comments and the PHA's decision made on these recommendations. (24 CFR §903.17(a), 24 CFR §903.19)

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the 5-Year PHA Plan. The 5-Year PHA Plan provides the PHA's mission, goals and objectives for serving the needs of low-income, very low-income, and extremely low-income families and the progress made in meeting the goals and objectives described in the previous 5-Year Plan.

Public reporting burden for this information collection is estimated to average .76 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

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

ATTACHMENTS

2020 AGENCY PLAN

SUMMARY OF ATTACHMENTS

Attachment #1 – Statement of Housing Needs and Strategy for Addressing Housing Needs

Attachment #2 – Statement of Financial Resources

Attachment #3 – Proposed Changes in Operation and Management Policies

- Public Housing Utility Allowance Schedule (3A)
- Section 8 Housing Choice Voucher Program Utility Allowance (3B)
- Section 8 Housing Choice Voucher Program Payment Standard (3C)
- Revisions to Public Housing Flat Rent Schedule (Based upon 2020 SAFMRs) [3E]
- Proposed Revisions to the HCVP Administrative Plan
- Proposed Revisions to the Public Housing ACOP

Attachment #4 – Asset Management Table

Attachment #5 - De-concentration Policy & Related Analysis

Attachment #6 – Form HUD-50077, PHA Certifications of Compliance with the PHA Plans and Related Regulations

Attachment #7 - Statement of Progress in Meeting Mission and Goals

Attachment #8 – Resident Advisory Board Comments

Attachment #9 – Certification by State or Local Officials

Attachment #10A – Form HUD 50075.2 Capital Fund Program Annual Statement / Performance and Evaluation Report for 2017 Award Approved by HUD on 8/16/17

Attachment #10B – Form HUD 50075.2 Capital Fund Program Annual Statement / Performance and Evaluation Report for 2018 Award Approved by HUD on 5/29/18

Attachment #10C – Form HUD 50075.2 Capital Fund Program Annual Statement / Performance and Evaluation Report for 2019 Award Approved by HUD on 5/5/19

Attachment #10D - Capital Fund Program Five-Year Action Plan

Attachment #10E – Capital Fund Program Management Needs Assessment and Five-Year Action Plan for Management Improvements

Attachment #11 – Carbon Monoxide Detector Law Compliance Statement

Attachment #12 – Certification of No Challenged Elements

Attachment #13 - Statement Regarding Use of Project-Based Vouchers, Mixed Finance, Modernization or Development, Demolition and/or Disposition, and Conversion of Public Housing

Attachment #14 – 5 Year Plan Goals for PHA Fiscal Years 2021 – 2025

Attachment #15 – Plan Goals for Agency Plan Fiscal Year 2021

Attachment #16 – Statement Regarding Significant Amendments or Modifications

Attachment #1 – Statement of Housing Needs and Strategy for Addressing Housing Needs

**Statement of Housing Needs and
Strategy for Addressing Housing Needs (updated for APU 2019)**

Statement of Housing Needs

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

Note: The most recent data available regarding housing need in the jurisdiction is the St. Clair County Consolidated Plan 2015 – 2019 compiled by the St. Clair County Intergovernmental Grants Department (SCC-IGD). SCCHA relies heavily on the County's Consolidated Plan to identify the housing needs of families in St. Clair County.

The St. Clair County Housing Authority (SCCHA) reviewed St. Clair County's Consolidated Plan (CP) for 2015 – 2019 to assess the housing needs of the families in its jurisdiction, which includes all of St. Clair County. All of the information provided below comes directly from the CP.

HUD defines low income households using three income levels:

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

The following findings were contained in the CP.

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

According to the CP, there are 45,685 low-income households in St. Clair County (out of a total of 107,105 households) with the following income range distribution:

Extremely Low	Very Low	Low
15,522 (34%)	13,433 (29%)	16,730 (37%)

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

- There are sharp contrasts in the economic status of St. Clair County residents. Communities in the American Bottoms have widespread poverty with accompanying blight and abandonment, while those of the bluffs have extensive residential and commercial development. *Note: The CP does not formally define the area referred to as the “American Bottoms” but it is commonly known in the locale as the area west of Illinois State Route 157 continuing to the Illinois State line at the Mississippi River. The area includes the City of East St. Louis and the surrounding collar communities, including both incorporated and unincorporated areas.*
- The American Bottoms communities have become economically distressed over the past 50 years as more affluent residents moved from the bottoms to the bluffs and to nearby Missouri communities.
- The African-American population is mostly concentrated in the American Bottoms in and around (the City of East St. Louis) and the collar communities. This is one of the largest minority concentrations in the State of Illinois. The bottom communities suffer from disinvestment, few economic opportunities, a disproportionate number of poor residents and a housing stock that has increasingly become housing of last resort.
- The disinvestment has also resulted in a lack of resources in affected school districts and a decline in positive perceptions of the affected communities.
- Cost burden, defined as housing cost greater than either 30% or 50% of income, is the most prevalent housing problem in St. Clair County, for both renter and owner households.
- Affordability is major issue for single person households. Approximately 43% of single person households, or an estimated 12,785 single person households, are in need of some sort of housing assistance.
- An estimated 48.4% of renter households and 23.5% of owner households face a housing cost burden.
- Lower income households tend to experience housing cost burden more frequently. In St. Clair County, 73.9% of extremely low income households (less than 30% of AMI), or 11,308 households, are housing cost burdened.
- Extremely low-income households generally face two key challenges; the challenge of finding quality affordable housing and the challenge of finding appropriate supportive services.

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

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

- Asian Households at 80% - 100% AMI
- Hispanic Households at 80% - 100% AMI

All together, these groups represent approximately 1,028 households and approximately 785 households with housing problems. In some cases, the number of households in a racial or ethnic group is small, resulting in potentially misleading data. For example, there are only 125 Asian households at 80%-100% AMI, 90 of which experience housing problems. This results in a high percentage (72%) of households experiencing housing problems, but the overall numeric need is actually quite small.

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

- Black / African-American Households
- Asian Households

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

The CP notes that local service providers estimate that there are approximately 1,500 to 2,000 homeless individuals in St. Clair County. The majority of tracked homeless persons and households are African-American. However, there are likely additional unidentified and untracked homeless person and households, especially in rural areas of St Clair County.

The CP estimates that 35,669 St. Clair County residents, or 13.6% of civilian, non-institutionalized persons, have a disability. Of these 35,669 residents, approximately 9.3% are youth under the age of 18, 53.9% are adults ages 18-65 and 36.8% are seniors 65 years of age or older. Special needs persons generally face two key challenges – finding quality affordable housing and appropriate supportive services (the same key challenges faced by low-income households).

While concluding that the number of people living with HIV/AIDS who are in need of ongoing rental assistance and support in order to achieve housing stability and improved access to care continues to grow, no specific numbers are included in the CP. It is also noted in the CP that St. Clair County does not receive HOPWA funding to specifically address housing and supportive service needs of the population with HIV/AIDS.

In looking at the supply of housing available at all household income levels, the CP determined that there is not sufficient housing for renter households at the less than 30% of AMI income level. There are 3,954 housing units affordable to renters making less than 30% of AMI, but there are 10,410 renter households at that income level. The CP concludes that Renter households at this income level are incredibly difficult to house. It further determines that while there are “technically” enough affordable units available for renter households at the 30%-50% or 50% - 80% AMI level, the data available demonstrates that affordable rental housing is not

uniformly available in all communities, and there may be a lack of affordable rental housing in areas of high opportunity (with access to jobs, services, high quality schools, etc.).

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

The Section 8 Housing Choice Voucher Program (HCVP) waiting list as of 09/20/19 included the following demographic breakdown.

	Number of Families	Percent of Families
Total Wait List	6,807	100%
Extremely Low Income	5,931	87%
Very Low Income	698	10%
Low Income	178	3%
Families w/ children	3,815	56%
Elderly Families	714	10%
Families w/ disability	1,683	25%
White households	1,192	18%
Black households	5,247	77%
Other – race / ethnicity *	425	6%
Hispanic households	111	2%

*Or none declared

The Section 8 HCVP wait list remains open with an estimated twelve percent (12%) annual turnover rate (based upon the number of program participants who leave the program compared to the number of tenants under contract at the beginning of the year --- January 2020).

The wait list for the **Public Housing** program is site based, with eighteen different locations. 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	6,581	100%
Extremely Low Income	5,740	87%
Very Low Income	687	10%
Low Income	154	3%
Families w/ children	3,502	53%
Elderly Families	859	13%
Families w/ disability	1,704	26%

White households	1,260	19%
Black households	4,948	75%
Other – race / ethnicity *	421	6%
Hispanic households	115	1%

*Or none declared

0 & 1 Bedroom	2,923	42%
2 Bedroom	2,428	35%
3 Bedroom	1,281	19%
4 Bedroom	231	3%
5+ Bedroom	26	< 1%

All public housing wait lists remain open and the annual turnover is estimated at twenty-two percent (22%) based upon the number of move-outs annually compared to the number of occupied units at the beginning of the calendar year 2019.

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). Nearly 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 twenty percent (20%) of all applicant households report having a disability. Seventy-five percent (75%) or more of applicant households are black. Black households were identified in the CP as one of the minority groups having a disproportionate housing need. The number of Hispanic and other minority households on the wait lists is consistent with general population statistics cited in the County's CP 2015-2019.

SCCHA reviewed available data sets contained in the CP 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 differ significantly.

Reference Note: The St. Clair County Consolidated Plan 2015 to 2019 served as the basis of identifying the housing needs of households in the jurisdiction. A copy of the Consolidated Plan is on file and available for review upon request in conjunction with the review and comment period for the St. Clair County Housing Authority's 2020 Agency Plan.

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

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

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

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

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

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

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

Need: Specific Family Types: The Elderly

Strategy 1: Target available assistance to the elderly:

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

Need: Specific Family Types: Families with Disabilities

Strategy 1: Target available assistance to Families with Disabilities:

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

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

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

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

Strategy 2: Conduct activities to affirmatively further fair housing

- Counsel Section 8 tenants as to location of units outside of areas of poverty or minority concentration and assist them to locate those units
- Market the Section 8 program to owners outside of areas of poverty /minority concentrations

- Administer all programs in non-discriminatory manner
- Arrange for Fair Housing / Reasonable Accommodation training for staff on periodic basis

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

Need: Upgrade the quality of the public housing stock

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

- The public housing developments considered most questionable in terms of long-term viability are:
 1. The remaining units (106 family units) in the #30-08 portion of the Ernest Smith Sr. Apartments (ESSA) in Centreville (AMP 3) have been identified for demolition. *Note: The five buildings (20 units) of #30-08 located on South 46th Street have already received demolition approval from HUD (with an application for Replacement Tenant Protection Vouchers pending).*
 2. It is hoped the 30-06 portion of the ESSA (AMP 3) will be determined viable in the long-term with needed physical improvements achieved through a “re-positioning” option available through HUD. However, both the sanitary and storm sewer systems servicing these units are old, deteriorated and result in frequent flooded streets and back-ups in the dwelling units. Without the needed sewer system upgrades, these public housing units cannot be considered viable. SCCHA is engaged in dialog with Commonfields of Cahokia (the water and sewer provider), Centreville Township and City, and other local partners (such as the St. Clair County Intergovernmental Grants Department) in hopes of developing a resolution / plan for the needed sanitary and storm sewer upgrades. Assuming the sewer system upgrades are completed, SCCHA will pursue a re-positioning strategy to keep these units in service.
 3. Similarly, it is hoped the public housing units in Brooklyn, the Thomas Terry Apartments (TTA) comprising AMP 1 can achieve long-term viability. However, this property is plagued by Village-owned streets that are seriously deteriorated and in the current condition the streets alone make the long-term viability of the development questionable. The Village is also extremely poverty and minority concentrated. The poverty rate is 40.94% and the population is 95.7% African-American. Additionally, there are very few services / retail shopping options available in the community. These factors combine to make it a tough decision whether or not to try and retain the federally-assisted housing presence in this community. If the streets are not properly restored, there really is no decision to make. Demolition / disposition of the property will be pursued.

4. The public housing units in Washington Park, thirty-two (32) scattered site units with twenty (20) one bedroom units designed for non-elderly disabled persons and twelve (12) two bedroom units with general (or family) occupancy designation, pose another dilemma. Again, the community is highly concentrated in terms of poverty (49% of the population) and minority population (92% African-American). Source: US Census 2018 ACS 5-Year Survey]. Additionally, the community is plagued by crime, dilapidated streets, vandalized or burned out housing structures and an array of other adverse conditions. The public housing units represent some of the best housing stock, even though renovations and updates are needed. The scattered site characteristic of the public housing units is not a positive factor in the case of Washington Park. Many of the units are in isolated locations on streets where there is no other occupied unit in the block or even adjacent blocks. It is a fair question whether or not SCCHA should work to retain the public housing units in this community. The property maintains high occupancy rates because of the desperate need for housing in St. Clair County. Most households who select Washington Park have no other viable / affordable housing option. Demolition / disposition of these units with Replacement Tenant Protection Vouchers may be the best method by which to provide for the housing needs of low-income households.

(2) Reasons for Selecting Strategies

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

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

Attachment #2 – Statement of Financial Resources

Attachment #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, SCCHA anticipates receiving the same level of funding, unless otherwise noted, for the upcoming fiscal year (Plan Year).

a) Current Year Federal Grants / Funding Allocations (Budgeted FYE-6/30/2020)

- Public Housing Operating Fund \$ 3,222,029
- Public Housing Capital Fund Program (CFP 2019) \$ 2,442,608
- Annual Contribution for Section 8 Tenant-Based Assistance Administrative Fee \$ 1,380,160
- Housing Assistance Payments \$13,959,000

b) Unobligated Prior Year Grants / Funding Allocations

- Capital Fund Program (501-18 – as of 1/31/20) \$ 1,304,334
- Capital Fund Program (501-19 – as of 1/31/20) \$ 2,054,755

c) Public Housing Dwelling Rental Income \$ 2,340,000

d) Other Income

- Interest Income \$ 12,600
- Miscellaneous (maintenance charges, laundry income, etc.) \$ 151,500

Total Resources \$ 26,866,986
=====

Date Prepared: 2/14/2020

Attachment #3 – Proposed Changes in Operation and Management Policies

- Proposed 2020 Public Housing Utility Allowance Schedule (3A)
- Housing Choice Voucher Program 2020 Utility Allowance Schedule (3B)
- Housing Choice Voucher Program 2020 Payment Standard (3C)
- Revisions to Public Housing Flat Rent Schedule (Based upon 2020 SAFMRs) [3D]
- Proposed Revisions to the HCVP Administrative Plan
- Proposed Revisions to the Public Housing ACOP

Attachment #3A – Proposed Public Housing 2020 Utility Allowance Schedule



ST. CLAIR COUNTY HOUSING AUTHORITY
PUBLIC HOUSING MANAGEMENT DIVISION

1790 South 74th Street
Belleville, IL 62223



Phone: (618) 277-3290

Fax: (618) 277-1806

TDD: (800) 545-1833 x 933

www.sccha.org

December 31, 2019

Dear Resident:

"Happy New Year!" I hope you and your family had a wonderful Christmas holiday.

Enclosed you will find two documents ---the proposed 2020 Utility Allowance and Flat Rent Schedules (anticipated effective date is June 1, 2020 for the UAS and July 1, 2020 for the Flat Rent Schedule).

The change in the Utility Allowance Schedule (UAS) is relatively minor compared to the current (or 2019) schedule, reflecting small increases (ranging from \$1 to \$9) for most public housing properties. The UAS was prepared by a professional services contractor that specializes in calculating UAS for public housing authorities. This notice opens the sixty (60) day resident comment period. After the close of the comment period, the SCCHA Board of Commissioners will consider approving the UAS at the March 11, 2020 meeting. The anticipated effective date is June 1, 2020 with the new allowances being implemented in conjunction with household recertifications that are effective June 1st and thereafter.

The Public Housing Flat Rent Schedule is also available for comment during the same sixty day period. The Flat Rent is established at the eighty percent (80%) of the Small Area Fair Market Rents as determined by HUD for each zip code in St. Clair County, less the proposed utility allowance for public housing properties located within the same zip code. Using this method, which results in the Flat Rent most favorable to residents (i.e. the lowest possible flat rent given HUD requirements for establishing flat rents), the Flat Rents will increase for most public housing locations by relatively modest amounts (ranging from \$6 to \$32). The Flat Rents for Amber Court in Belleville, Bel-Plaza 2 in Belleville, Garden Ridge in Lebanon, Millstadt and Swansea are projected to decrease moderately to largely (ranging from \$10 to \$60) as a result of the changes in the Small Area Fair Market Rents as determined by HUD. The proposed Flat Rent Schedule will follow the same adoption procedure as the UAS ---going through a sixty (60) day resident comment period before being presented to the Board of Commissioners for consideration at the March meeting. The anticipated effective date for the Flat Rent Schedule is July 1, 2020.

Written comments may be submitted to my attention at the address listed above through March 2, 2020.

Sincerely,

Larry McLean
Executive Director

Enclosures (2)

Distribution: All Public Housing Residents

**St. Clair County Housing Authority
Public Housing Utility Allowance Schedule
Proposed Effective Date: June 1, 2020**

Development		Bedroom Size					
		0	1	2	3	4	5
30-1	Brooklyn		70	78	85	92	100
30-2	Marissa			80	87	94	
30-2C ¹	Marissa			146			
30-3	Dupo	57	57	67	73	81	
30-5	Smithton		70		85	92	
30-6 no Hi	Centreville		73	83	91	99	
30-6 Hi	Centreville Hi-Rise		32	37			
30-6 H-C 0/0 ²	Centreville Hi-Rise		59				
30-6 H-C 1/0 ³	Centreville Hi-Rise		63				
30-60	Centreville		74	83	92	99	
30-7	Marissa		72				
30-8	Centreville		72	81	89		105
30-80	Centreville			81	89		
30-9 – Gas Heat	Brooklyn		116	135	159		
30-9A – Elec. Heat ⁴	Brooklyn			162			
30-10	Centreville		74	82	92	99	
30-11	Alorton		78	90	105	116	
30-12	Brooklyn		124	143	171		
30-13	New Athens		144	173			
30-14	Lebanon		144	177	232		
30-16 (North 47 th)	Belleville Bel-Plaza ²		55				
30-61 (S. Church)	Belleville Bel-Plaza-1		55				
30-17	Washington Park		123	143			
30-17A S/F House ⁵	Washington Park			153			
30-18	Swansea		129				
30-19	Lenzburg		90	104			
30-20	Centreville		78				
30-21	New Athens		153				
30-22	Millstadt		163	201	269		
30-24A ⁶	O'Fallon			77			
30-24B	O'Fallon			167			
30-27	Belleville – Amber Ct.		67	79			
30-28	Lenzburg			82	90		

Proposed Effective Date: June 1, 2020

Resident Comment Period: January 1, 2020 through March 2, 2020

Anticipated Board Approval Date: March 11, 2020

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

Attachment #3B - Housing Choice Voucher Program 2020 Utility Allowance Schedule

Utility Allowance Schedule

See Public Reporting and Instructions on back.

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

OMB Approval
No. 25577-0169
exp. 7/31/2022

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

Date (mm/dd/yyyy): 01/08/2020 For Moves and New Admits
04/01/2020 For Annuals

Locality: St Clair County Housing Authority, IL		Unit Type: Single-Family House/Detached					
Utility or Service:	0 BR	1 BR	2 BR	3 BR	4 BR	5 BR	6 BR
Monthly Dollar Allowances							
Heating							
a. Natural Gas	\$20.00	\$23.00	\$27.00	\$31.00	\$34.00	\$37.00	\$40.00
b. Bottle Gas/Propane	\$60.00	\$70.00	\$83.00	\$93.00	\$104.00	\$113.00	\$121.00
c. Electric	\$30.00	\$35.00	\$41.00	\$47.00	\$53.00	\$58.00	\$63.00
d. Electric Heat Pump	\$17.00	\$19.00	\$23.00	\$26.00	\$29.00	\$32.00	\$34.00
e. Oil / Other	\$63.00	\$73.00	\$85.00	\$95.00	\$108.00	\$118.00	\$128.00
Cooking							
a. Natural Gas	\$2.00	\$2.00	\$3.00	\$4.00	\$5.00	\$6.00	\$7.00
b. Bottle Gas/Propane	\$6.00	\$6.00	\$9.00	\$13.00	\$17.00	\$19.00	\$21.00
c. Electric	\$4.00	\$5.00	\$7.00	\$9.00	\$11.00	\$14.00	\$15.00
Other Electric & Cooling							
Other Electric (Lights & Appliances)	\$23.00	\$27.00	\$38.00	\$48.00	\$59.00	\$70.00	\$75.00
Air Conditioning	\$5.00	\$6.00	\$13.00	\$19.00	\$26.00	\$33.00	\$36.00
Water Heating							
a. Natural Gas	\$5.00	\$7.00	\$10.00	\$12.00	\$15.00	\$18.00	\$20.00
b. Bottle Gas/Propane	\$17.00	\$21.00	\$28.00	\$38.00	\$45.00	\$55.00	\$60.00
c. Electric	\$13.00	\$15.00	\$19.00	\$24.00	\$28.00	\$32.00	\$35.00
d. Oil / Other	\$18.00	\$20.00	\$30.00	\$40.00	\$48.00	\$58.00	\$63.00
Water, Sewer, Trash Collection							
Water	\$47.00	\$48.00	\$58.00	\$67.00	\$76.00	\$86.00	\$92.00
Sewer	\$35.00	\$36.00	\$47.00	\$59.00	\$71.00	\$82.00	\$90.00
Sewer Treatment	\$14.00	\$15.00	\$21.00	\$27.00	\$33.00	\$39.00	\$43.00
Trash Collection (avg)	\$23.00	\$23.00	\$23.00	\$23.00	\$23.00	\$23.00	\$23.00
Tenant-supplied Appliances							
Range / Microwave Tenant-supplied	\$11.00	\$11.00	\$11.00	\$11.00	\$11.00	\$11.00	\$11.00
Refrigerator Tenant-supplied	\$12.00	\$12.00	\$12.00	\$12.00	\$12.00	\$12.00	\$12.00
Other--specify: Monthly Charges							
Electric Charge \$15.37	\$15.00	\$15.00	\$15.00	\$15.00	\$15.00	\$15.00	\$15.00
Natural Gas Charge \$22.70	\$23.00	\$23.00	\$23.00	\$23.00	\$23.00	\$23.00	\$23.00
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		\$			
		Sewer		\$			
Address of Unit		Trash Collection		\$			
		Range / Microwave		\$			
		Refrigerator		\$			
		Other		\$			
		Other		\$			
Number of Bedrooms		Total		\$			



Utility Allowance Schedule

See Public Reporting and Instructions on back.

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

OMB Approval
No. 25577-0169
exp. 7/31/2022

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

Date (mm/dd/yyyy): 01/08/2020 For Moves and New Admits
04/01/2020 For Annuals

Locality:
St Clair County Housing Authority, IL

Unit Type: **Duplex, Townhouse or Row House**

Utility or Service:	0 BR	1 BR	2 BR	3 BR	4 BR	5 BR	6 BR
Monthly Dollar Allowances							
Heating							
a. Natural Gas	\$18.00	\$21.00	\$24.00	\$27.00	\$30.00	\$33.00	\$35.00
b. Bottle Gas/Propane	\$53.00	\$64.00	\$72.00	\$83.00	\$91.00	\$98.00	\$108.00
c. Electric	\$19.00	\$23.00	\$29.00	\$35.00	\$41.00	\$48.00	\$52.00
d. Electric Heat Pump	\$14.00	\$17.00	\$20.00	\$22.00	\$24.00	\$27.00	\$29.00
e. Oil / Other	\$58.00	\$68.00	\$75.00	\$85.00	\$95.00	\$105.00	\$113.00
Cooking							
a. Natural Gas	\$2.00	\$2.00	\$3.00	\$4.00	\$5.00	\$6.00	\$7.00
b. Bottle Gas/Propane	\$6.00	\$6.00	\$9.00	\$13.00	\$17.00	\$19.00	\$21.00
c. Electric	\$4.00	\$5.00	\$7.00	\$9.00	\$11.00	\$14.00	\$15.00
Other Electric & Cooling							
Other Electric (Lights & Appliances)	\$20.00	\$23.00	\$32.00	\$42.00	\$51.00	\$60.00	\$65.00
Air Conditioning	\$6.00	\$7.00	\$12.00	\$17.00	\$22.00	\$27.00	\$30.00
Water Heating							
a. Natural Gas	\$5.00	\$7.00	\$10.00	\$12.00	\$15.00	\$18.00	\$20.00
b. Bottle Gas/Propane	\$17.00	\$21.00	\$28.00	\$38.00	\$45.00	\$55.00	\$60.00
c. Electric	\$13.00	\$15.00	\$19.00	\$24.00	\$28.00	\$32.00	\$35.00
d. Oil / Other	\$18.00	\$20.00	\$30.00	\$40.00	\$48.00	\$58.00	\$63.00
Water, Sewer, Trash Collection							
Water	\$47.00	\$48.00	\$58.00	\$67.00	\$76.00	\$86.00	\$92.00
Sewer	\$35.00	\$36.00	\$47.00	\$59.00	\$71.00	\$82.00	\$90.00
Sewer Treatment	\$14.00	\$15.00	\$21.00	\$27.00	\$33.00	\$39.00	\$43.00
Trash Collection (avg)	\$23.00	\$23.00	\$23.00	\$23.00	\$23.00	\$23.00	\$23.00
Tenant-supplied Appliances							
Range / Microwave Tenant-supplied	\$11.00	\$11.00	\$11.00	\$11.00	\$11.00	\$11.00	\$11.00
Refrigerator Tenant-supplied	\$12.00	\$12.00	\$12.00	\$12.00	\$12.00	\$12.00	\$12.00
Other-specify: Monthly Charges							
Electric Charge \$15.37	\$15.00	\$15.00	\$15.00	\$15.00	\$15.00	\$15.00	\$15.00
Natural Gas Charge \$22.70	\$23.00	\$23.00	\$23.00	\$23.00	\$23.00	\$23.00	\$23.00
Actual Family Allowances							
To be used by the family to compute allowance. Complete below for the actual unit rented.		Utility or Service		per month cost			
Name of Family		Heating		\$			
		Cooking		\$			
Address of Unit		Other Electric		\$			
		Air Conditioning		\$			
Number of Bedrooms		Water Heating		\$			
		Water		\$			
		Sewer		\$			
		Trash Collection		\$			
		Range / Microwave		\$			
		Refrigerator		\$			
		Other		\$			
		Other		\$			
		Total		\$			



Utility Allowance Schedule

See Public Reporting and Instructions on back.

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

OMB Approval
No. 25577-0169
exp.7/31/2022

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

Date (mm/dd/yyyy): 01/08/2020 For Moves and New Admits
04/01/2020 For Annuals

Locality:
St Clair County Housing Authority, IL

Unit Type: **Apartment (3 or More Unit)**

Utility or Service:	0 BR	1 BR	2 BR	3 BR	4 BR	5 BR	6BR
Monthly Dollar Allowances							
Heating							
a. Natural Gas	\$14.00	\$16.00	\$19.00	\$21.00	\$24.00	\$27.00	\$29.00
b. Bottle Gas/Propane	\$42.00	\$49.00	\$59.00	\$64.00	\$72.00	\$81.00	\$87.00
c. Electric	\$13.00	\$16.00	\$21.00	\$26.00	\$31.00	\$36.00	\$39.00
d. Electric Heat Pump	\$12.00	\$14.00	\$16.00	\$18.00	\$20.00	\$22.00	\$24.00
e. Oil / Other	\$45.00	\$53.00	\$60.00	\$68.00	\$75.00	\$83.00	\$90.00
Cooking							
a. Natural Gas	\$2.00	\$2.00	\$3.00	\$4.00	\$5.00	\$6.00	\$7.00
b. Bottle Gas/Propane	\$6.00	\$6.00	\$9.00	\$13.00	\$17.00	\$19.00	\$21.00
c. Electric	\$4.00	\$5.00	\$7.00	\$9.00	\$11.00	\$14.00	\$15.00
Other Electric & Cooling							
Other Electric (Lights & Appliances)	\$16.00	\$18.00	\$26.00	\$33.00	\$40.00	\$47.00	\$51.00
Air Conditioning	\$6.00	\$7.00	\$10.00	\$13.00	\$16.00	\$18.00	\$20.00
Water Heating							
a. Natural Gas	\$5.00	\$5.00	\$7.00	\$10.00	\$12.00	\$14.00	\$16.00
b. Bottle Gas/Propane	\$15.00	\$17.00	\$23.00	\$28.00	\$38.00	\$43.00	\$47.00
c. Electric	\$10.00	\$12.00	\$16.00	\$19.00	\$22.00	\$26.00	\$28.00
d. Oil / Other	\$15.00	\$18.00	\$23.00	\$30.00	\$38.00	\$45.00	\$48.00
Water, Sewer, Trash Collection							
Water	\$47.00	\$48.00	\$58.00	\$67.00	\$76.00	\$86.00	\$92.00
Sewer	\$35.00	\$36.00	\$47.00	\$59.00	\$71.00	\$82.00	\$90.00
Sewer Treatment	\$14.00	\$15.00	\$21.00	\$27.00	\$33.00	\$39.00	\$43.00
Trash Collection (avg)	\$23.00	\$23.00	\$23.00	\$23.00	\$23.00	\$23.00	\$23.00
Tenant-supplied Appliances							
Range / Microwave Tenant-supplied	\$11.00	\$11.00	\$11.00	\$11.00	\$11.00	\$11.00	\$11.00
Refrigerator Tenant-supplied	\$12.00	\$12.00	\$12.00	\$12.00	\$12.00	\$12.00	\$12.00
Other--specify: Monthly Charges							
Electric Charge \$15.37	\$15.00	\$15.00	\$15.00	\$15.00	\$15.00	\$15.00	\$15.00
Natural Gas Charge \$22.70	\$23.00	\$23.00	\$23.00	\$23.00	\$23.00	\$23.00	\$23.00
Actual Family Allowances							
To be used by the family to compute allowance. Complete below for the actual unit rented.			Utility or Service		per month cost		
			Heating		\$		
Name of Family			Cooking		\$		
			Other Electric		\$		
Address of Unit			Air Conditioning		\$		
			Water Heating		\$		
Number of Bedrooms			Water		\$		
			Sewer		\$		
			Trash Collection		\$		
			Range / Microwave		\$		
			Refrigerator		\$		
			Other		\$		
			Other		\$		
			Total		\$		



Utility Allowance Schedule

See Public Reporting and Instructions on back.

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

OMB Approval
No. 25577-0169
exp 7/31/2022

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

Date (mm/dd/yyyy): 01/08/2020 For Moves and New Admits
04/01/2020 For Annuals

Locality: St Clair County Housing Authority, IL		Unit Type: Mobile Home				
Utility or Service:	0 BR	1 BR	2 BR	3 BR	4 BR	5 BR
Monthly Dollar Allowances						
Heating						
a. Natural Gas	\$17.00	\$20.00	\$23.00	\$26.00	\$29.00	
b. Bottle Gas/Propane	\$51.00	\$60.00	\$70.00	\$77.00	\$87.00	
c. Electric	\$32.00	\$37.00	\$39.00	\$40.00	\$41.00	
d. Electric Heat Pump	\$14.00	\$17.00	\$20.00	\$22.00	\$24.00	
e. Oil / Other	\$53.00	\$63.00	\$73.00	\$83.00	\$90.00	
Cooking						
a. Natural Gas	\$2.00	\$2.00	\$3.00	\$4.00	\$5.00	
b. Bottle Gas/Propane	\$6.00	\$6.00	\$9.00	\$13.00	\$17.00	
c. Electric	\$4.00	\$5.00	\$7.00	\$9.00	\$11.00	
Other Electric & Cooling						
Other Electric (Lights & Appliances)	\$23.00	\$27.00	\$38.00	\$48.00	\$59.00	
Air Conditioning	\$6.00	\$7.00	\$12.00	\$16.00	\$21.00	
Water Heating						
a. Natural Gas	\$5.00	\$7.00	\$10.00	\$12.00	\$15.00	
b. Bottle Gas/Propane	\$17.00	\$21.00	\$28.00	\$38.00	\$45.00	
c. Electric	\$13.00	\$15.00	\$19.00	\$24.00	\$28.00	
d. Oil / Other	\$18.00	\$20.00	\$30.00	\$40.00	\$48.00	
Water, Sewer, Trash Collection						
Water	\$47.00	\$48.00	\$58.00	\$67.00	\$76.00	
Sewer	\$35.00	\$36.00	\$47.00	\$59.00	\$71.00	
Sewer Treatment	\$14.00	\$15.00	\$21.00	\$27.00	\$33.00	
Trash Collection (avg)	\$23.00	\$23.00	\$23.00	\$23.00	\$23.00	
Tenant-supplied Appliances						
Range / Microwave Tenant-supplied	\$11.00	\$11.00	\$11.00	\$11.00	\$11.00	
Refrigerator Tenant-supplied	\$12.00	\$12.00	\$12.00	\$12.00	\$12.00	
Other--specify: Monthly Charges						
Electric Charge \$15.37	\$15.00	\$15.00	\$15.00	\$15.00	\$15.00	
Natural Gas Charge \$22.70	\$23.00	\$23.00	\$23.00	\$23.00	\$23.00	
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		\$	
			Sewer		\$	
Address of Unit			Trash Collection		\$	
			Range / Microwave		\$	
			Refrigerator		\$	
			Other		\$	
			Other		\$	
Number of Bedrooms			Total		\$	



Attachment #3C - Housing Choice Voucher Program 2020 Payment Standard

To: Board of Commissioners

Fr: Larry McLean, Executive Director *LM*
Pam Jackson, Program Director *PJ*

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

Dt: September 18, 2019

As you know, HUD publishes the annual Fair Market Rent (FMR) Limits for the Housing Choice Voucher Program (HCVP) annually.

The new FMRs were published (copy attached) and we are recommending that the **2020 Payment Standard Schedule (PSS) for the HCVP** in the following dollar amounts:

0 B/R	1 B/R	2 B/R	3 B/R	4 B/R	5 B/R
\$601 (95%)	\$666 (95%)	\$860 (95%)	\$1126 (95%)	\$1325 (95%)	\$1524 (95%)

Note: Amounts are based upon the landlord furnishing all utilities and the stove and refrigerator.

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

The recommended schedule increases the payment standard from the 90% to the 95% level of the newly established HUD FMRs. The recommended payment standard amounts all increased from the current schedule (as illustrated on the attached calculation page).

The recommendation encompasses a number of factors, including, but not necessarily limited to budgetary considerations, the number of participants / units under contract, administrative fees earned to make the program financially viable, voucher utilization success rates and continued uncertainty regarding future program funding levels. **The effective date will be the date of approval for moves and new admissions and January 1, 2020 for recertifications for current participants, assuming the recommendation is approved.**

Thank you.

9/17/2019

Payment Standard Calculation

2020

Fair Market Rents

	0	1	2	3	4	5	6
\$	633	\$ 701	\$ 905	\$ 1,185	\$ 1,395	\$ 1,604	\$ 1,814

Payment Standard

Level (90% - 110%) = 95%

Efficiency	1-Br	2-Br	3-Br	4-Br	5-Br	6-Br
\$ 601.35	\$ 665.95	\$ 859.75	\$ 1,125.75	\$ 1,325.25	\$ 1,524.04	\$ 1,722.83
\$ 601	\$ 666	\$ 860	\$ 1,126	\$ 1,325	\$ 1,524	\$ 1,723

Rounded

Adjustment

Check

Adjustment %

0.9494	0.9501	0.9503	0.9502	0.9498	0.9500	0.9501
--------	--------	--------	--------	--------	--------	--------

2019 Payment Standard

Less: Rounded Above

Difference

2018 PS % of 2019 Fair Market Rents

\$ 572	\$ 642	\$ 832	\$ 1,094	\$ 1,287	\$ 1,480	\$ 1,674
\$ 601	\$ 666	\$ 860	\$ 1,126	\$ 1,325	\$ 1,524	\$ 1,723
\$ (29)	\$ (24)	\$ (28)	\$ (32)	\$ (38)	\$ (44)	\$ (49)
90%	92%	92%	92%	92%	92%	92%

Recommended - 2020

% of FMR

Rounded %

\$601	\$666	\$860	\$1,126	\$1,325	\$1,524	\$1,723
94.94%	95.01%	95.03%	95.02%	94.98%	95.00%	95.01%
95%	95%	95%	95%	95%	95%	95%

SCHEDULE B - FY 2020 Final FAIR MARKET RENTS FOR EXISTING HOUSING

PAGE 11

ILLINOIS continued

METROPOLITAN FMR AREAS										Counties of FMR AREA within STATE									
	0 BR	1 BR	2 BR	3 BR	4 BR		0 BR	1 BR	2 BR	3 BR	4 BR		0 BR	1 BR	2 BR	3 BR	4 BR		
Danville, IL MSA.....	482	572	740	969	1002	Vermilion													
Davenport-Moline-Rock Island, IA-IL MSA.....	524	615	778	1028	1169	Henry, Mercer, Rock Island													
De Witt County, IL HMF.....	561	565	698	942	946	De Witt													
DeKalb County, IL HMF.....	683	769	996	1437	1692	DeKalb													
Decatur, IL MSA.....	490	588	752	1034	1066	Macon													
Grundy County, IL HMF.....	479	571	735	954	1028	Grundy													
Jackson County, IL HMF.....	479	571	735	954	1028	Jackson													
Kankakee, IL MSA.....	621	692	912	1220	1368	Kankakee													
Kendall County, IL HMF.....	941	947	1240	1789	2104	Kendall													
Macoupin County, IL HMF.....	526	530	698	948	1010	Macoupin													
Peoria, IL MSA.....	564	606	772	998	1082	Marshall, Peoria, Stark, Tazewell, Woodford													
Rockford, IL MSA.....	540	629	828	1122	1222	Boone, Winnebago													
Springfield, IL MSA.....	542	627	802	1001	1086	Menard, Sangamon													
St. Louis, MO-IL HMF.....	633	701	905	1185	1395	Calhoun, Clinton, Jersey, Madison, Monroe, St. Clair													
Williamson County, IL HMF.....	560	563	742	1003	1165	Williamson													
NONMETROPOLITAN COUNTIES										NONMETROPOLITAN COUNTIES									
	0 BR	1 BR	2 BR	3 BR	4 BR		0 BR	1 BR	2 BR	3 BR	4 BR		0 BR	1 BR	2 BR	3 BR	4 BR		
Adams.....	567	574	722	1000	1028	Brown.....	678	773	1016	1314	1472		678	773	1016	1314	1472		
Bureau.....	489	570	751	936	1017	Carroll.....	474	530	698	870	1038		474	530	698	870	1038		
Cass.....	474	600	698	923	979	Christian.....	504	569	707	899	958		504	569	707	899	958		
Clark.....	479	536	706	947	1008	Clay.....	474	613	698	870	1094		474	613	698	870	1094		
Coles.....	500	570	741	1012	1075	Crawford.....	474	581	698	870	946		474	581	698	870	946		
Cumberland.....	474	530	698	870	1109	Douglas.....	540	544	698	995	1069		540	544	698	995	1069		
Edgar.....	474	571	698	905	1044	Edwards.....	474	613	698	870	979		474	613	698	870	979		
Effingham.....	534	537	698	1007	1107	Fayette.....	503	530	698	870	946		503	530	698	870	946		
Franklin.....	526	530	698	891	946	Fulton.....	518	597	763	969	1239		518	597	763	969	1239		
Gallatin.....	474	613	698	994	997	Greene.....	474	580	698	870	1005		474	580	698	870	1005		
Hamilton.....	474	536	698	870	997	Hancock.....	474	542	698	958	1075		474	542	698	958	1075		
Hardin.....	474	530	698	870	997	Henderson.....	455	562	698	870	979		455	562	698	870	979		
Iroquois.....	539	546	698	909	1098	Jasper.....	474	607	698	975	997		474	607	698	975	997		
Jefferson.....	470	556	715	902	969	Jo Daviess.....	511	594	698	905	994		511	594	698	905	994		
Johnson.....	455	530	698	870	1112	Knox.....	455	530	698	942	946		455	530	698	942	946		
La Salle.....	509	593	781	1059	1186	Lawrence.....	475	530	698	870	994		475	530	698	870	994		
Lee.....	477	556	732	912	1048	Livingston.....	463	543	710	936	1058		463	543	710	936	1058		
Logan.....	491	550	724	957	1061	McDonough.....	474	567	698	885	1057		474	567	698	885	1057		
Marion.....	457	544	698	933	993	Mason.....	491	549	723	901	979		491	549	723	901	979		
Massac.....	537	608	792	987	1073	Montgomery.....	508	563	698	870	991		508	563	698	870	991		
Morgan.....	473	551	726	955	1039	Moultrie.....	519	599	698	990	1047		519	599	698	990	1047		
Ogle.....	525	599	789	1028	1086	Perry.....	474	599	698	960	1006		474	599	698	960	1006		
Pike.....	525	530	698	870	946	Pope.....	474	530	698	994	997		474	530	698	994	997		
Pulaski.....	596	613	698	1007	1225	Putnam.....	519	563	742	930	1091		519	563	742	930	1091		
Randolph.....	475	572	700	936	1055	Richland.....	540	543	698	922	965		540	543	698	922	965		
Saline.....	474	530	698	946	987	Schuyler.....	474	530	698	870	1016		474	530	698	870	1016		
Scott.....	474	530	698	870	1018	Shelby.....	474	605	698	1007	1192		474	605	698	1007	1192		

Attachment #3D - Revisions to Public Housing Flat Rent Schedule (Based upon 2020 SAFMRs)

St. Clair County Housing Authority										
Public Housing										
Flat Rent Schedule - 2020 (Using Small Area FMRs)										
Effective Date: July 1, 2020										
	0-Br	1-Br	2-Br	3-Br	4-Br	5-Br				
Alorton - (Hawthorne - 011)	\$	442	\$	582	\$	775	\$	916		
Belleville (Amber Court - 027)	\$	453	\$	593						
Belleville (Bel-Plaza 1 - Church - 061)	\$	489								
Belleville (Bel-Plaza 2 - N. 47th - 016)	\$	465								
Brooklyn - Thomas Terry - 001	\$	450	\$	594	\$	795	\$	940	\$	1,086
Brooklyn - TT - 009 (Gas Heat)	\$	404	\$	537	\$	721				
Brooklyn - TT - 009 (Elec Heat)			\$	510						
Brooklyn - TT - 012	\$	396	\$	529	\$	709				
Centreville - ESS - AJB HI-Rise	\$	488	\$	635						
Centreville - ESS - AJB HRC 0/0	\$	461								
Centreville - ESS - AJB HRC 0/1	\$	457								
Centreville - ESS (006)	\$	447	\$	589	\$	789	\$	933		
Centreville - ESS (008)	\$	448	\$	591	\$	791			\$	1,081
Centreville - ESS (020)	\$	441								
Centreville - PMM (010)	\$	446	\$	590	\$	788	\$	933		
Centreville - PMM (060)	\$	446	\$	589	\$	788	\$	933		
Centreville - PMM (080)			\$	591	\$	791				
Dupo	\$	415	\$	441	\$	605	\$	807	\$	959
Lebanon (Garden Ridge - 014)	\$	392	\$	519	\$	680				
Lenzburg (019)	\$	430	\$	568						
Lenzburg (028)			\$	590	\$	790				
Marissa (002)			\$	592	\$	793	\$	938		
Marissa (002 - C)			\$	526						
Marissa (007)	\$	448								
Millstadt	\$	365	\$	479	\$	619				
New Athens (Phillips - 013)	\$	376	\$	499						
New Athens (South Clinton - 021)	\$	367								
O'Fallon (024-A)			\$	747						
O'Fallon (024-B)			\$	657						
Smithton (005)	\$	450			\$	795	\$	940		
Swansea (Fullerton Rd - 018)	\$	391								
Washington Park - 017 Scattered	\$	397	\$	529						
Washington Park - 017 Scattered			\$	519						
Effective Date: July 1, 2020										
Resident Comment Period: 1/1/20 thru 3/1/20										
Anticipated Board Approval Date: March 11, 2020										

Attachment 3E – Revisions to the HCVP Administrative Plan

Proposed Policy Revisions

Section 8 Housing Choice Voucher Program (HCVP) Administrative Plan

- Revise Chapter 3, Part 3-I.K "Foster Children and Foster Adults" by adding the following sentence at the end of the second paragraph under "SCCHA Policy."

"SCCHA will not increase the subsidy standard (i.e. the number of bedrooms on the voucher) for the sole purpose of accommodating additional foster children."

- Revise Chapter 3, Part 3-III.C "Other Permitted Reasons for Denial of Assistance" by adding the following sentences at the end of the "SCCHA Policy" statement.

"Applicants or applicant household members with any outstanding criminal warrants at the time the application is being screened for eligibility shall be given up to ninety (90) days to clear the warrant. If the warrant is not cleared within ninety (90) days SCCHA will deny the applicant. The applicant may be denied without the opportunity to clear the warrant if the underlying criminal offense resulting in the warrant would result in denial.

Applicants or applicant household members with open felony criminal cases shall be granted up to ninety (90) days to have the case adjudicated. If the case is not adjudicated within ninety (90) days, the applicant will be denied. If the case is subsequently adjudicated within twelve (12) months of denial without conviction of or guilty plea by the applicant (or other household member), upon the written request of the applicant, the applicant will be reinstated at the initial eligibility screening stage."

Attachment #3F – Revisions to the Public Housing ACOP

Proposed Revisions to Public Housing Admissions and Continued Occupancy Policy and Pet Policy

Public Housing Admissions and Continued Occupancy Policy (ACOP)

- Revise Chapter 10, Part 10.2 “Assignment of Bedroom Sizes” to replace the reference to age ten (10) with age six (6) within the parentheses “()” in the third paragraph (on page 26) and in item “B” on page 27.

Pet Policy

- Eliminate the last sentence under the second section entitled “Types and Number of Pets.” The sentence requiring the front paws of cats to be declawed is removed.

Attachment #4 – Asset Management Table

ATTACHMENT #4
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 - 2020

Development Identification		Activity Description						
Name, Number, and Location	Number and Type of units	Capital Fund Program Parts II and III Component 7a	Development Activities Component 7b	Demolition / Disposition Component 8	Designated housing Component 9	Conversion Component 10	Home- ownership Component 11a	Other (describe) Component 17¹
#1 – Brooklyn	100	\$0	RAD Conversion Assessment	Potential Demolition	None Planned	None Planned	None Planned	DBA/CSA
#2 – Marissa	18	\$1,293,597	RAD Conversion Assessment	None Planned	None Planned	None Planned	None Planned	DBA/CSA
#3 – Dupo	20	\$315,000	RAD Conversion Assessment	None Planned	None Planned	None Planned	None Planned	DBA/CSA
#5 – Smithton	10	\$265,000	RAD Conversion Assessment	None Planned	None Planned	None Planned	None Planned	DBA/CSA
#6 – Centreville	178	\$397,500	RAD Conversion Assessment	AJB -32 Units Demolition Year 1	32 units elderly only	None Planned	None Planned	DBA/CSA
#7 – Marissa	14	\$0	RAD Conversion Assessment	None Planned	None Planned	None Planned	None Planned	DBA/CSA
#8 – Centreville.	142	\$768,097	None Considered Feasible	Demo 20 Units on S 46 th St Approved / Demo of Remaining 106 Units Planned	None Planned	None Planned	None Planned	DBA/CSA
#9 – Brooklyn	42	\$187,597	RAD Conversion Assessment	Potential Demo / Disposition	None Planned	None Planned	None Planned	DBA/CSA
#10 – Centreville	110	\$1,315,597	RAD Conversion Assessment	Potential Demo / Disposition	None Planned	None Planned	None Planned	DBA/CSA
#11 – Alorton	44	\$0	RAD Conversion Assessment	None Planned	None Planned	None Planned	None Planned	DBA/CSA
#12 – Brooklyn	16	\$0	RAD Conversion Assessment	Potential Demo / Disposition	None Planned	None Planned	None Planned	DBA/CSA
#13 – New Athens	16	\$266,000	RAD Conversion Assessment	None Planned	4-lbr disabled only	None Planned	None Planned	DBA/CSA

¹ Development-based Accounting and Comprehensive Stock Assessment

#14 – Lebanon	24	\$72,000	RAD Conversion Assessment	None Planned	4-1br disabled only	None Planned	None Planned	DBA/CSA
#16 & #61 – Belleville	86	\$2,009,597	RAD Conversion Assessment	None Planned	86 units elderly only	None Planned	None Planned	DBA/CSA
#17 – Washington Park	32	\$559,000	RAD Conversion Assessment	Potential Demo / Disposition	20-1br disabled only	None Planned	None Planned	DBA/CSA
#18 – Swansea	16	\$436,000	RAD Conversion Assessment	None Planned	16 units elderly only	None Planned	None Planned	DBA/CSA
#19 – Lenzburg	8	\$105,000	RAD Conversion Assessment	None Planned	4-1br disabled only	None Planned	None Planned	DBA/CSA
#20 – Centreville	8	\$180,000	RAD Conversion Assessment	Potential Demo / Disposition	None Planned	None Planned	None Planned	DBA/CSA
#21 – New Athens	16	\$384,000	RAD Conversion Assessment	None Planned	16 units elderly only	None Planned	None Planned	DBA/CSA
#22 – Millstadt	18	\$520,000	RAD Conversion Assessment	None Planned	None Planned	None Planned	None Planned	DBA/CSA
#24 – O'Fallon	20	\$510,000	RAD Conversion Assessment	None Planned	None Planned	None Planned	None Planned	DBA/CSA
#27 – Belleville	64	\$1,054,597	RAD Conversion Assessment	None Planned	64 units elderly only	None Planned	None Planned	DBA/CSA
#28 – Lenzburg	8	\$80,000	RAD Conversion Assessment	None Planned	None Planned	None Planned	None Planned	DBA/CSA

Attachment #5 – Income De-concentration Policy & Related Analysis

ATTACHMENT #5 – AP 2020

INCOME DE-CONCENTRATION POLICY STATEMENT

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

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

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

DECONCENTRATION INCENTIVES

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

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

**ST. CLAIR COUNTY HOUSING AUTHORITY
INCOME CONCENTRATION ANALYSIS
AGENCY PLAN - 2020**

Development	AMP	Average Income	Weighted Average	Adjusted Avg. Income	85% Threshold	115% Threshold	Within Range	
PHA-WIDE		\$14,355	1.03	\$14,793	\$12,574	\$17,012		
Thomas Terry Apts.	001	\$13,924	1.10	\$15,247			Y	
Ernest Smith Sr.	003	\$11,528	1.10	\$12,653			Y	
Private Mathison Manor	002	\$14,895	1.09	16,227			Y	

Weighted Average Adjustment For Bedroom Size Distribution

	Occupied Units	Efficiency Units (.70)	1-bedroom Units (0.85)	2-bedroom Units (1.00)	3-bedroom Units (1.25)	4-bedroom Units (1.40)	5-bedroom Units (1.61)	Check Unit Count
PHA-WIDE	955	4	349	314	232	45	11	955
Thomas Terry Apts.	153	0	28	63	46	12	4	153
Ernest Smith Sr. Apts.	201	0	59	43	84	8	7	201
Private Mathison Manor	198	0	16	107	66	9	0	198
PHA-Wide	$(4 \times .70) + (349 \times .85) + (314 \times 1) + (232 \times 1.25) + (45 \times 1.40) + (11 \times 1.61) / 955$							
	1.03	1.03						
Thomas Terry Apts.	$0 \times .70 + 28 \times .85 + 63 \times 1 + 46 \times 1.11 + 12 \times 1.40 + 4 \times 1.61 / 153$							
	1.10	1.10						
Ernest Smith Sr. Apts.	$0 \times .70 + 59 \times .85 + 43 \times 1 + 84 \times 1.25 + 8 \times 1.40 + 7 \times 1.61 / 201$							
	1.10	1.10						
Private Mathison Manor	$0 \times .70 + 16 \times .85 + 107 \times 1 + 66 \times 1.25 + 9 \times 1.40 + 0 \times 1.61 / 198$							
	1.09	1.09						

INCOME DE-CONCENTRATION WORKSHEET - AP 2020
(Occupancy Data as of 10/1/19)

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	97	72	74%	5045.00	38.1%
30-9	42	40	25	63%		
30-12 Brooklyn	16	16	13	81%		
30-19	8	8	6	75%	5040.02	14.0%
30-28 Lenzberg	8	8	5	63%		
30-2	18	17	14	82%		
30-7 Marissa	14	14	11	79%		
30-3 Dupo	20	20	16	80%	5031.00	14.9%
30-5 Smithton	10	10	9	90%	5039.06	8.6%
30-6	82	81	71	88%	5027.00	48.3%
30-8	126	112	93	83%		
30-20 Centreville	8	8	6	75%		
30-10	110	101	74	73%	5028.00	40.6%
30-60	85	84	71	85%		
30-80 Centreville	16	13	9	69%		
30-11 Alorton	44	44	22	50%	5025.00	54.1%
30-13	16	14	8	57%	5040.01	5.8%
30-21 New Athens	16	15	8	53%		
30-14 Lebanon	24	23	12	52%	5043.02	13.9%
30-16	38	36	22	61%	5016.05	3.4%
30-27 Belleville	64	63	39	62%		
30-17 Washington Park	32	30	24	80%	5022.00	39.1%
30-18 Swansea	16	16	9	56%	5033.01	10.2%
30-22 Millstadt	18	18	12	67%	5032.03	5.8%
30-24 O'Fallon	20	20	11	55%	5043.51	9.7%
30-61 Belleville	48	47	25	53%	5019.00	10.0%

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

01/28/2020
19:22:45

ST. CLAIR COUNTY HOUSING AUTHORITY
Income Range Summary Report

Page # : 1

Project # :ALL Tenant : Active

Proj #	Project Name	Low	Very Low	Extremly Low	Other	Total
001	THOMAS-TERRY APARTMENTS	6	18	72	1	97
002	CLAYTON MANAOR	0	3	14	0	17
003	BLUFFSIDE APTS - DUPO	2	2	16	0	20
005	SMITHTON APTS	0	1	9	0	10
006	ERNEST SMITH SR. APTS	2	8	71	0	81
007	CLAYTON MANOR APTS	0	3	11	0	14
008	ERNEST SMITH SR. APTS	4	13	93	2	112
009	THOMAS-TERRY APTS	5	10	25	0	40
010	PVT. MATHISON MANOR APTS	7	18	74	2	101
011	HAWTHORNE TERRACE APTS	4	16	22	2	44
012	THOMAS-TERRY APTS	1	2	13	0	16
013	BECKER PARK APTS	1	5	8	0	14
014	GREENWOOD APTS - LEBANON	4	5	12	2	23
016	BEL-PLAZA II	1	12	22	1	36
017	WASHINGTON PARK APTS	2	4	24	0	30
018	SWANSEA APARTMENTS	1	5	9	1	16
019	LAKEVIEW APTS	1	1	6	0	8
020	ERNEST SMITH SR. APTS	0	2	6	0	8
021	RICKERT STATION APTS	1	5	8	1	15
022	HERITAGE MANOR APTS	3	3	12	0	18
024	JEFFERSON SQUARE APTS	2	5	11	2	20
027	AMBER COURT APTS	4	19	39	1	63
028	LAKEVIEW APTS	0	3	5	0	8
060	PVT MATHISON MANOR APTS	3	10	71	0	84
061	BEL-PLAZA I	6	15	25	1	47
080	PRIVATE MATHISON MANOR APTS	0	4	9	0	13
801	TOWNHOUSE COURT APARTMENTS	0	0	8	0	8
803	GWENDOLENE COURT APARTMENTS	0	0	14	0	14
804	GWEN COURT REHAB UNIT	0	1	0	0	1
901	CEDAR RIDGE APTS - LEBANON	1	3	19	0	23
Total		61	196	728	16	1001

End of Report

**Attachment #6 – Form HUD-50077, PHA Certifications of Compliance with the PHA Plans
and Related Regulations (Civil Rights Certification)**

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

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 02/29/2016

**PHA Certifications of Compliance with the PHA Plan and Related Regulations including
Required Civil Rights Certifications
Resolution #19-__**

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 XX 5-Year and/or Annual PHA Plan for the PHA fiscal year beginning July 1, 2020, 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 has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the RAB (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
4. The PHA 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.
5. 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.
6. The PHA will affirmatively further fair housing by examining their programs or proposed programs, identifying any impediments to fair housing choice within those programs, addressing 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 by maintaining records reflecting these analyses and actions.
7. For PHA Plans 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 2010-25);
 - The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
 - Adoption of a site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
 - The PHA shall take reasonable measures to assure that such a waiting list is consistent with affirmatively furthering fair housing;
 - 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).
8. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
9. 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.
10. 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.
11. 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.

12. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
13. 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.
14. 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.
15. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
16. 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.
17. 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).
18. 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.
19. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

ST. CLAIR COUNTY HOUSING AUTHORITY

PHA Name

IL-030

PHA Number/HA Code

____ Annual PHA Plan for Fiscal Year ____

XX 5-Year PHA Plan for Fiscal Years 2021 – 2025 (Starting July 1, 2020)

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	Title
EUGENE VERDU / BILLIE-JEAN MILLER	CHAIRMAN / SECRETARY
Signature	Date

Attachment #7 - Statement of Progress in Meeting Mission and Goals

FIVE-YEAR PLAN STATUS REPORT – FEBRUARY 2020

Goal: Expand the supply of assisted housing by reducing public housing vacancies, leveraging private or other public funds and/or supporting and encouraging the efforts of other developers to create additional housing opportunities.

Status: *Mixed Results.* The number of public housing vacancies was reduced from 39 as of 1/1/15 to 37 as of 1/1/16, but increased to 46 as of 1/3/17, to 47 as of 1/2/18, to 66 as of 1/2/19 and to 74 as of 1/2/2020.

The number of Section 8 HCVP participants / units under contract increased from 2091 on 1/1/15 to 2209 on 1/1/16, to 2,312 on 1/1/17, but dropped to 2280 on 2/1/18, dropping again to 2259 on 1/1/19, before increasing to 2337 on 1/2/2020. Two hundred forty-six (246) additional families are receiving assistance under the HCVP in 2020 compared to 2015.

A Project Based Voucher Housing Assistance Payments Contract (PBV HAPC) became effective in September 2015 for 29 units at the Cottages @ Cathedral Square senior housing development. SCCHA entered into another PBV HAPC effective July 2018 for an additional 30 units (18 one bedroom and 12 two bedroom units) of senior housing at the Lincoln Park Villas in O'Fallon and another effective January 31, 2019 for sixteen (16) PBV vouchers (twelve 1 bedroom and four 2 bedroom units) in a 62 unit senior development in Swansea known as the Metro Landing at Swansea. In November 2019 the SCCHA Board approved the award of PBVs for the following developments:

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

As of this writing, none of the above developments have progressed to A-HAPC stage (Agreement to Enter into a HAPC). SCCHA's past PBV activity has increased the supply of affordable senior housing in high-demand areas of St. Clair County. The recent PBV awards have the potential to add additional senior, but also increase the supply of new affordable family units.

SCCHA received HUD approval in December 2019 to demolish the Adeline James Building (32 unit senior building) and the portion of the Ernest Smith Sr. Apartments in Centreville known as development IL30-08 located on South 46th Street (5 family buildings totaling 20 units). An application is pending at HUD for fifty-two (52) Replacement Tenant Protection Vouchers (TPVs) and staff is actively working with the impacted residents to plan their relocations, with the appropriate compensation and assistance.

Goal: Improve the quality of assisted housing through improved public housing and voucher management, increased customer satisfaction, renovating and modernizing the public housing stock using Capital Fund Program, and full implementation of project based budgeting and asset management approach to public housing operations.

Status: Limited Progress. Full obligation and expenditure of Capital Fund allocations within implementation dates achieved for all grants received. The majority of Capital Fund expenditures for 2013 funding year were designated for the final phase of HV/AC upgrades and mechanical room renovations in the development #IL030-006 in Centreville and starting the window replacement in development #IL030-008 in Centreville. The majority of 2014 CFP funding was targeted for exterior building improvements at #IL030-011 (Hawthorne, Alorton) and roof replacement at the two Marissa (#IL030-02 & 07) and two New Athens (#IL030-13 & 21) properties. Work items for 2015 CFP monies included site work at Alorton, exterior door replacement at Smithton (#IL030-05), window replacement and site improvements at Centreville (IL030-010- retention pond pump system upgrades), Brooklyn (#IL030-009 – includes underground water supply line replacement), Belleville (#IL030-027 – site lighting and parking lot resurfacing), and New Athens (#IL030-21 – parking lot resurfacing). The CFP allocation for 2016 targeted window replacement and site work in Centreville (IL030-006 /060), exterior building improvements at the properties in Dupo (IL030-003) and O'Fallon (IL030-024), and interior flooring, electrical upgrades and painting at the Bel-Plaza senior buildings in Belleville. The 2017 CFP allocation work items include street and/or parking lot resurfacing at Private Mathison Manor (Centreville – AMP 2), Ernest Smith Sr. Apartments (Centreville – AMP 3), and the two Bel-Plaza Senior Buildings in Belleville, along with Roof Replacement and exterior building and site improvements at the Lebanon public housing development (IL030-14 and part of AMP 5). The 2018 CFP grant includes ADA accessibility work at various properties; parking lot and deck coating at the Bel-Plaza 1 building in Belleville (IL30-61); HV/AC and water heater replacement, electrical panel and exterior lighting upgrades for Amber Court in Belleville (IL30-27), and; roofing and insulation work in Centreville (IL30-6), Millstadt (IL30-22), New Athens (IL30-21) and Lenzburg (IL30-28). Door renovations and window replacement in #30-9 (part of AMP 1 in Brooklyn); Kitchen and bath renovation and wall repairs in #30-12 (also in Brooklyn); demolition of the Adeline James Building and electrical panel upgrades in #30-06 in AMP 3 in Centreville; mechanical upgrades at the public housing properties in Belleville (Bel-Plaza 1 & 2 in AMP 4), Washington Park (#30-17 in AMP 5), and New Athens (#30-13 in AMP 6) is work funded by the 2019 CFP grant. The draft CFP 5 year Plan for 2020 (and beyond) has been issued for resident comment which will conclude with a Public Hearing on March 30, 2020. Year one (1) work items (as currently contained in the draft) include HV/AC replacement and mechanical room renovations in #30-10 (AMP 2 Centreville); security camera modifications (30-6), kitchen and bath renovations along with floor replacement in #30-20 (both in AMP 3 Centreville); kitchen and bath renovations, floor replacement and wall repair at #30-18 Swansea (AMP 4), #30-05 Smithton (AMP 6), and #30-13 and #30-21 New Athens (AMP 6).

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

Public Housing Assessment Scores have remained consistent in the eighties (86 for FYE 2014, 85 for FYE 2015, 87 for FYE 2016, 81 for FYE 2017, and 84 for FYE-2018), resulting in Standard Performer designation. HUD has not issued composite PHAS scores for 2019. The lack of adequate resources to maintain the physical structures (insufficient CFP grant monies and under-funded operating subsidies) is negatively impacting REAC physical assessment scores, making achievement of High Performer status under PHAS difficult and elusive. The future management assessment methodology to be used by HUD for the public housing program is undetermined at this time.

Section Eight Management Assessment Program (SEMAP) fell the fiscal year ending 6/30/15 to 81% a Standard Performer rating. The reasons for the decline were a reduced accuracy rate in annual income projections by program staff and under leasing (fund expenditure) for the assessment period. SEMAP scores rebounded for FYE-2016 returning to an above ninety percentage level (96%) and a High Performer designation. The FYE-2017 SEMAP score was 96%, the FYE-2018 score was 93% and the FYE-2019 score was 96%, all adequate to maintain "High Performer" status.

Full implementation of project-based budgeting and asset management has been achieved related to public housing operations. No formal customer satisfaction measurement / assessment tool has been developed and is unlikely to be developed within the plan period given funding inadequacies that continue to impact both major program (public housing and Section 8 HCVP). SCCHA will continue to strive to provide a high level of customer service, even if there is no specific measurement tool / system implemented.

Goal: Increasing assisted housing choices by providing voucher mobility counseling, conducting outreach efforts to potential voucher landlords, maintaining voucher payments 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.

Status: *Mixed Results.* All voucher recipients receive voucher mobility counseling at time of voucher issuance and there is a high level of portability activity among the Section 8 HCVP participants. Outreach efforts to recruit potential new landlords with properties located outside of income / minority concentrated areas are on-going. The payment standard was at the 100% of FMR level until the 2016 update of the FMRs. Program and Financial staff analyzed and determined that the 100% level could not be

maintained while also achieving sufficient units under contract to earn administrative fees adequate to meet program administration costs. Therefore, a payment standard schedule that kept the payment standard at the same level, but with a resulting percentage rate of between 94% and 98% of the FMRs was recommended to and approved by the Board of Commissioners effective February 10, 2016. After the release of the FMRs in late 2016, the Board of Commissioners approved another update to the Payment Standard Schedule that resulted in the payment standard being established at the 90% to 92% of FMR levels. The payment standard stayed the same for one and two bedroom units, with a minimal increase for efficiency and three bedroom units (\$16 and \$7 respectively), and a marginal increase for four and five bedroom units (\$41 and \$48 respectively). With the release of the FMRs in late 2017, at the recommendation of staff the Board of Commissioners adopted payment standards that were 90% to 91% of FMRs. This action was deemed necessary to lease-up sufficient participants / units to earn administrative fees needed to administer the program. SCCHA faced the same situation when the FMRs were released in late 2018; resulting in the adoption of payment standards at the 90% level. The payment standard was increased further in 2019 to the 94% - 95% level.

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

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

Status: *Continued Progress.* The income concentration analysis completed for agency plan years 2015 through 2017 determined that none of our public housing properties were disproportionately impacted by income level. However, the analysis completed for the 2018 Annual Plan Update (APU) indicated that our Ernest Smith Sr. Apartments (ESSA) in Centreville are below the 85% range, while the Private Mathison Manor (PMM) development also in Centreville is above the 115% range. The analysis for the 2019 APU produced the same result. All locations returned to “within range” status with the completion of the analysis for the 2020 AP (see Income De-Concentration Analysis contained in the accompanying PHA Plan Elements). The reasons the two public housing properties fell outside the 85% - 115% income range during the 2017 and 2018 plan period were not identifiable. The public housing leasing staff has reported increased difficulty in leasing units in the ESSA development. Based upon anecdotal reports from applicants, it is theorized that applicants with higher incomes (although well below the 30% of extremely low income limit) have more options and will wait for a unit at the PMM development (where children attend Cahokia School District 187) and lower income applicants with fewer choices are more likely to accept a unit at the ESSA (where children attend the East St. Louis School District 189). It remains to be seen whether the 2017 and 2018 results represent a two-year anomaly. The public housing leasing and management staffs will monitor this situation closely to determine what, if any,

management actions can be undertaken to ensure that none of our public housing developments have average household incomes outside the 85% to 115% range of overall average household income.

Security improvements, at least in a physical sense, have for the most part been restricted to limited expansion of the existing network of surveillance cameras that are operational at the properties in Brooklyn, Belleville and Centreville. SCCHA has submitted an emergency security grant application to HUD in 2014, 2015, 2016, 2017, 2018 and 2019. Each year the grant application was determined eligible for funding, but SCCHA did not receive a grant award, not being selected through the random draw process. A significant expansion of the surveillance camera network has been completed at the Private Mathison Manor complex in Centreville using operating budget reserves and the Amber Court senior development in Belleville using CFP funds. SCCHA staff works diligently to maintain a cooperative and collaborative relationship with the local police departments in the communities in which the public housing properties are located. In addition, coordination is maintained at the county, state and federal law enforcement levels through the services of SCCHA's Law Enforcement Liaison Officer.

SCCHA successfully obtained a designated housing plan, which reserves certain properties for senior citizens (age 62 and over), non-seniors with a disability, and mixed-population properties. The residents and resident organization leaders, including the Resident Advisory Board, strongly attest to the success of the designated housing plan in maintaining a positive living environment for those impacted by the designated housing plan. The designated housing plan was renewed by HUD in 2018 and the resident leaders strongly support SCCHA's plans to seek another two year renewal of the plan when it expires again in May 2020.

SCCHA staff continues to dedicate tremendous efforts in successful applicant screening and aggressive lease enforcement. Limited resources have resulted in at least temporary suspension of pre-occupancy home visits, which has weakened applicant screening efforts. Additionally, an aggressive local legal assistance program and the protections afforded residents under VAWA (the Violence Against Women Act) have made lease termination / eviction efforts more difficult and challenging.

Goal: 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.

Status: *Notable Progress.* As of January 2015 just more than thirty-seven percent (37.52%) of public housing families reported having an earned income source. In January 2016 the percentage of public housing families with earned income increased to 40.18% then decreased slightly to 39% in January 2017 and remaining about the same in January 2018 at 38.82% and 2019 at 38.53%. *Note: January 2020 information is not available because of a change in computer software programs.* This is considered

reflective of improved overall economic conditions at the national, state and county levels. Calendar years 2018 and 2019 were near, if not, record years in terms of public housing resident move-outs, being 191 and 206, respectively. Many of the move-outs were resident-initiated. Management staff reports that many families are choosing to vacate instead of paying higher rents resulting from increased employment earnings (and higher flat rents).

SCCHA has taken advantage of the regulatory opportunity for the Family Self-Sufficiency Coordinator (previously exclusively available to Section 8 participants) to recruit among and serve the public housing population. As of this time, six public housing families have executed FSS contracts, in addition to forty-four HCVP participants. Recruitment and screening among public housing residents will continue.

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

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

Goal: Ensure equal 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, disability, sexual orientation, and/or gender identity; provide a suitable living environment for families living in assisted housing, regardless of race, color, religion, national origin, sex, familial status, disability, sexual orientation, and/or gender identity; and ensure accessible housing to persons with all varieties of disabilities regardless of unit size required.

Status: *Progress Continues.* SCCHA continues to operate and/or administer all programs and services in a non-discriminatory manner. An in-service Fair Housing / Reasonable Accommodation Training sessions was conducted in March 2015, with most staff from the public housing, Section 8 HCVP, wait list and leasing departments attending. Similar training was completed in June 2016. SCCHA Department Directors and other key staff / supervisors routinely attend the annual Fair Housing and Reasonable

Accommodation Conference hosted by the St. Louis Metropolitan Equal Housing Council. During calendar year 2017 staff in-service trainings were conducted on “Fair Housing – What You Need to Know” and “VAWA” (both HUD-sponsored webinars). In April 2018 management staff attended the fair housing conference sponsored by EHOCC entitled “Segregation in St. Louis: Dismantling the Divide.” Maintenance and management staff participated in fair housing training in calendar year 2019, including:

- Fair Housing for the Maintenance Staff (March 20, 2019)
- Fair Housing Basics for the Intake, HCVP and Public Housing Management staff (April 10, 2019)
- Common Fair Housing Questions Your Maintenance Team Hears (October 17, 2019).

SCCHA continues to increase the physical accessibility of its properties, including exterior common areas, building / facility common areas, and individual unit accessibility, consistent with the 504 Transition Plan which was updated in 2013. SCCHA monitors (or self-assesses) to ensure the accessibility of its programs and operations from a “*soft side*” perspective. SCCHA wanted to contract for a professional services needs assessment of the operational and administrative aspects of its programs during the current five year plan period. However, this goal was not achieved due to resource constraints. The goal will be carried over to the next plan cycle.

SCCHA sought to have staff trained on HUD’s Affirmatively Furthering Fair Housing Plan Final Rule published July 16, 2015 to ensure compliance. It is noted that the current Administration suspended the AFFHP final rule with the stated intention of re-issuing a new rule in the future that ensures the equity objectives are achieved while utilizing a methodology that is less burdensome administratively. At this time the proposed rule is out for public comment. SCCHA remains committed to full compliance with all applicable fair housing requirements.

Goal: Complete HUD-required Physical Needs and Green Physical Needs Assessment (GPNA) of all public housing properties. Particular attention will be given to determining the long-term viability of the Adeline James Building (32 unit senior “High Rise” building originally built in the 1960’s) and the portion of the Ernest Smith Sr. Apartments built under HUD Development Program IL030-008.

Status: *Significant Progress.* SCCHA received the combined HUD Green Physical Needs Assessment Report in February 2016 from Hurst-Rosche, Inc. As anticipated, the report documents immediate and out-year physical needs for all AMPs (Asset Management Property groupings) with estimated costs that far exceed funding levels available in the Capital Fund Program (CFP). A physical needs assessment specific to the Adeline James Building and the 30-08 portion of the Ernest Smith Sr. Apartments (ESSA) located on South 46th Street was completed. The report served as the basis for SCCHA’s request and HUD’s approval of demolition of these properties based upon functional obsolescence. Resident relocation has begun and demolition is anticipated by

early 2021.

Goal: Update Section 504 Transition Plan for public housing program and other operations.

Status: *Limited Progress.* As noted above, the physical aspect of the 504 Transition Plan was updated in 2013 and physical improvements continue to be made consistent with the plan. Additionally, SCCHA has designated 10 units at 4 different AMPs to be substantially altered to meet current 504 Accessibility Standards. Funds are allocated for the targeted accessibility work in the 2018 CFP allocation. The bid announcement and related packet for this work item was published with bids due on February 20, 2020. Board approval in March is anticipated with work being completed by the close of 2020. For a variety of reasons, primarily scarce resources (both staff and funds), the operational and administrative aspects of the Transition Plan have not been professionally assessed and updated. SCCHA staff self-monitors and assesses on a continuous basis, while demonstrating extraordinary accommodation measures to ensure that all programs administered are fully accessible to members of the general public, in addition to applicants and participants with accessibility needs.

Goal: As indicated by the results of the physical needs assessments (traditional and/or new “green” concept) work with a housing development partner(s) to plan and implement replacement housing options for public housing developments or portions thereof determined functionally obsolete or otherwise not physically viable in the long-term.

Status: *Progress.* Initial thoughts and plans were to try and combine demolition / disposition / replacement housing activities involving the public housing inventories of SCCHA and the East St. Louis Housing Authority (ESLHA), given that at the time the 2015 Agency Plan was developed representatives of SCCHA, HUD and the ESLHA were actively engaged in transition planning to transfer the public housing assets of the ESLHA to SCCHA. Since that time, HUD terminated transition planning, and has taken steps to reinstate local control of the ESLHA. Therefore, SCCHA needs to proceed independently with its demolition / disposition / replacement housing activities. Such a process is very long-term in nature and jump-starting the process has been hampered by lack of funds on the part of SCCHA and a change in the application process for Low-Income Housing Tax Credits (LIHTC) administered by the Illinois Housing Development Authority’s (IHDA’s) that discourages development of replacement affordable housing in areas racially or income impacted. SCCHA has entered into a Housing Development Partner (HDP) Agreement with the St. Clair County HDP, LLC. SCCHA and its HDP have met with various local stakeholders to formulate a preliminary redevelopment strategy for at least an initial portion of the public housing portfolio in the City of Centreville. As stated previously, SCCHA is moving forward with the demolition of fifty-two (52) units of public housing in Centreville and its HDP has submitted two preliminary affordable housing proposals to IHDA, which were received favorably. While currently independent endeavors, the proposed new housing developments in Centreville mirror the planned demolition of the public housing units in terms of number (52 units) and designation (seniors and family units). It is possible that the now

“separate” activities will be merged or “connected” in the future if it proves beneficial / necessary for the success of the two projects. Many aspects of the broader redevelopment effort of SCCHA’s public housing inventory are beyond SCCHA’s direct control. Eventual success will require building a collaborative effort with multiple entities / stakeholders and is, unfortunately, likely to take much longer than SCCHA would prefer and was originally anticipated.

Goal: Obtain a final determination from HUD if the public housing and other federal assets of the Housing Authority of the City of East St. Louis (ESLHA) will be merged into SCCHA operations.

Status: *Goal Achieved.* HUD ended its receivership of the East St. Louis Housing Authority and returned local control to the City of East St. Louis during calendar year 2017.

ANNUAL PLAN *STATUS REPORT – FEBRUARY 2020*

Goal 1: 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: *Complete.* 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 four Property Managers (with support and technical assistance from the Maintenance Director). Specialized maintenance services such as HV/AC, plumbing and after-hours emergency services remain centralized under the Maintenance Director. Further refinement of internal procedures / processes is on-going 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 SCCHA continues to review HUD-issued guidance and compliance materials and will change, modify and adapt internal processes and procedures in the future as needed to ensure continued compliance, SCCHA believes that it has achieved compliance with HUD’s asset-based management directives / requirements.

Goal 2: For increased efficiency and improved management, reconfigure the AMPs (Asset Management Projects) in the public housing program, reducing the number of AMPs from ten (10) to six (6). Note: This goal was held over from the prior year / plan cycle ---a request is pending HUD review and approval at this time.

Status: *Complete.* SCCHA has obtained HUD approval of the AMP reconfiguration with an implementation date of July 1, 2016.

Goal 3: 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 for all grants received. The majority of Capital Fund expenditures for 2013 funding year were designated for the final phase of HV/AC upgrades and mechanical room renovations the development #IL030-006 in Centreville and starting the window replacement in development #IL030-008 in Centreville. The majority of 2014 CFP funding was targeted for exterior building improvements at #IL030-011 (Hawthorne, Alorton) and roof replacement at the two Marissa (#IL030-02 & 07) and two New Athens (#IL030-13 & 21). Work items for 2015 CFP monies included site work at Alorton, exterior door replacement at Smithton (#IL030-05), window replacement and site improvements at Centreville (IL030-010-

retention pond pump system upgrades), Brooklyn (#IL030-009 – includes underground water supply line replacement), Belleville (#IL030-027 – site lighting and parking lot resurfacing), and New Athens (#IL030-21 – parking lot resurfacing). The CFP allocation for 2016 targets window replacement and site work in Centreville (IL030-006 /060), exterior building improvements at the properties in Dupo (IL030-003) and O’Fallon (IL030-024), and interior flooring, electrical upgrades and painting at the Bel-Plaza senior buildings in Belleville. The 2017 CFP allocation work items include street and/or parking lot resurfacing at Private Mathison Manor (Centreville – AMP 2), Ernest Smith Sr. Apartments (Centreville – AMP 3), and the two Bel-Plaza Senior Buildings in Belleville, along with Roof Replacement and exterior building and site improvements at the Lebanon public housing development (IL030-14 and part of AMP 5). The 2018 CFP grant includes ADA accessibility work at various properties; parking lot and deck coating at the Bel-Plaza 1 building in Belleville (IL30-61); HV/AC and water heater replacement, electrical panel and exterior lighting upgrades for Amber Court in Belleville (IL30-27), and; roofing and insulation work in Centreville (IL30-6), Millstadt (IL30-22), New Athens (IL30-21) and Lenzburg (IL30-28). Improvements funded by the 2019 CFP grant includes door renovations and window replacement in #30-9 (part of AMP 1 in Brooklyn); kitchen and bath renovation and wall repairs in #30-12 (also in Brooklyn); demolition of the Adeline James Building and electrical panel upgrades in #30-06 in AMP 3 in Centreville; mechanical upgrades at the public housing properties in Belleville (Bel-Plaza 1 & 2 in AMP 4), Washington Park (#30-17 in AMP 5), and New Athens (#30-13 in AMP 6).

The draft CFP 5 year Plan for 2020 (and beyond) has been issued for resident comment which will conclude with a Public Hearing on March 30, 2020. Year one (1) work items (as currently contained in the draft) include HV/AC replacement and mechanical room renovations in #30-10 (AMP 2 Centreville); security camera modifications (30-6), kitchen and bath renovations along with floor replacement in #30-20 (both in AMP 3 Centreville); kitchen and bath renovations, floor replacement and wall repair at #30-18 Swansea (AMP 4), #30-05 Smithton (AMP 6), and #30-13 and #30-21 New Athens (AMP 6). The CFP 5 Year Plan is based upon the significant presumption that 2019 funding levels are maintained for the full 5 year period. Although increased substantially in FFY 2018 and 2019, CFP funds appropriated annually by Congress and distributed by HUD are insufficient to meet the long term physical needs of SCCHA’s public housing inventory, jeopardizing the long-term viability of some of the properties. Continued, long-term underfunding of capital funds for the national public housing stock was referenced in the General Deputy Assistant Secretary for Public and Indian Housing, Dominique Blom, 11/13/18 letter to all PHA Executive Directors encouraging them to consider “re-positioning” their public housing assets using the Rental Assistance Demonstration (RAD) Program.

Goal 4: 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 5: Continue fire prevention efforts, including, but not limited to vigilant unit inspections by maintenance and/or management personnel

Status: *Efforts Continue.* 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, including the phased in replacement of existing removable battery operated smoke detectors with the ten year sealed battery devices by the end of calendar year 2022 as required by recently enacted Illinois statute.

Goal 6: Comply with statutory and any HUD regulatory requirements to maintain site-based wait lists for public housing program.

Status: *Significant Progress.* SCCHA successfully administers its site-based wait list for its public housing properties in non-discriminatory manner that is consistent with fair housing and affirmatively further fair housing regulatory provisions. Staff needs to obtain training on the Affirmatively Furthering Fair Housing – Final Rule published by HUD July 16, 2015. *Note: The AFFH rule was suspended by federal executive action and is anticipated to be replaced with a new rule in the future. The new rule is now in the public comment phase. SCCHA will comply with the requirements of the new rule once published and finalized.* SCCHA also needs to arrange for independent third-party testing to document the non-discriminatory impact of its site-based waiting list program. Identifying qualified parties to carry out the independent testing and the associated costs have been the primary obstacles to achieving said goal. If goal is not completed by the end of the current plan period (June 30, 2020) it will be carried over to the new plan period starting July 1, 2020.

Goal 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.

Status: **Goal Achieved.** In-service training for all staff on this subject was held March 24, 2015 by the staff of the Metropolitan St. Louis Equal Housing & Opportunity Commission (EHOC). An in-service training was held April 24, 2015 entitled “Fair Housing – Understanding VAWA” conducted by associates of Nan McKay University. Fair Housing and Reasonable Accommodation staff in-service training was completed in June 2016. SCCHA Department Directors and other key staff / supervisors routinely attend the annual Fair Housing and Reasonable Accommodation Conference hosted by the EHOC. During calendar year 2017 staff in-service trainings were conducted on “Fair Housing – What You Need to Know” and “VAWA” (both HUD-sponsored webinars). In April 2018 management staff attended the fair housing conference sponsored by EHOC entitled “Segregation in St. Louis: Dismantling the Divide.” Maintenance and management staff participated in fair housing training in calendar year 2019, including:

- Fair Housing for the Maintenance Staff (March 20, 2019)
- Fair Housing Basics for the Intake, HCVP and Public Housing Management staff (April 10, 2019)
- Common Fair Housing Questions Your Maintenance Team Hears (October 17, 2019).

SCCHA plans to continue to arrange for periodic fair housing / reasonable accommodation training of its staff (subject to availability) to ensure full compliance with these important laws and regulations.

Goal 8: Complete the update of SCCHA’s Section 504 Transition Plan that was initiated in 2013.

Status: **Limited Progress.** SCCHA continues to increase the physical accessibility of its properties, including exterior common areas, building / facility interior common areas, and individual unit accessibility, consistent with the updated 2013 Transition Plan. Additionally, SCCHA has designated 10 units at 5 different AMPs to be substantially altered to meet current 504 Accessibility Standards. Funds are allocated for this targeted accessibility work in the 2018 CFP allocation. The bid packet for this work item is in the development stage with the anticipation that the bids will be solicited in the first half of 2019. SCCHA monitors (or self-assesses) to ensure the accessibility of its programs and operations from a “*soft side*” perspective. SCCHA has not yet, but intends to contract for a professional services needs assessment of the operational and administrative aspects of its programs. Availability of resources, including both staff time and money has delayed achievement of this aspect of this goal.

Goal 9: Upon the direction of HUD, develop transition plan for merging operations with the Housing Authority of the City of East St. Louis (ESLHA).

Status: *Goal Dropped.* HUD conditionally returned the East St. Louis Housing Authority to local control during calendar year 2017.

Goal 10: Work with housing development partner(s) to determine the need for, assess the feasibility of, and develop plans for the replacement of public housing inventory that is determined to be no longer viable. Primary focus at this time is on the Adeline James Senior Building (part of the development known as IL030-006) and the portion of the Ernest Smith Sr. Apartments in Centreville known as IL030-008, but assessment and analysis is not limited to these properties.

Status: *Limited Progress.* Initial thoughts and plans were to try and combine demolition / disposition / replacement housing activities involving the public housing inventories of SCCHA and the East St. Louis Housing Authority (ESLHA), given that at the time this 2015 Agency Plan was developed representatives of SCCHA, HUD and the ESLHA were actively engaged in transition planning to transfer the public housing assets of the ESLHA to SCCHA. Since that time, HUD terminated transition planning, and has taken steps to reinstate local control of the ESLHA. Therefore, SCCHA needs to proceed independently with its demolition / disposition / replacement housing activities. Such a process is very long-term in nature and jump-starting the process has been hampered by lack of funds on the part of SCCHA and a change in the application process for Low-Income Housing Tax Credits (LIHTC) administered by the Illinois Housing Development Authority's (IHDA's) that discourages development of replacement affordable housing in areas racially or income impacted. SCCHA has entered into a Housing Development Partner (HDP) Agreement with the St. Clair County HDP, LLC. SCCHA and/or its HDP have met with various local stakeholders to formulate a preliminary redevelopment strategy for at least an initial portion of the public housing portfolio in the City of Centreville. As stated previously, SCCHA is moving forward with the demolition of fifty-two units of public housing in Centreville and its HDP has submitted two preliminary affordable housing proposals to IHDA, which were received favorably. While currently independent endeavors, the proposed new housing developments in Centreville mirror the planned demolition of the public housing units in terms of number (52 units) and designation (seniors and family units). It is possible that the now "separate" activities will be merged or "connected" in the future if it proves beneficial / necessary for the success of the two projects. Many aspects of the broader redevelopment effort of SCCHA's public housing inventory are beyond SCCHA's direct control. Eventual success will require building a collaborative effort with multiple entities / stakeholders and is, unfortunately, likely to take much longer than SCCHA would prefer and was originally anticipated. With this said, it is anticipated SCCHA will submit a second demolition application to HUD involving the 106 remaining family units of the #30-08, part of AMP 3 in Centreville during the next plan year.

Goal 11: Work with the Illinois Department of Children and Family Services (IDCFS) to successfully administer Family Unification Vouchers.

Status: *Continued Progress.* Success of this program is completely dependent upon an adequate number of referrals through the IDCFS to achieve and maintain full lease-up which is considered 95 vouchers for this program that was inherited by SCCHA in conjunction with the merger of the Section 8 HCVP Program of the ESLHA in October 2013. As of February 2016 there were 59 active participants under contract with several more in various stages of screening and lease-up. SCCHA's goal was to achieve full lease up during fiscal year ending 6/30/17, dependent upon an adequate number of referrals being received. As of February 2018 there are 91 active participants under contract with several others in various stages of screening and lease-up. SCCHA met and surpassed the goal of having 95 FUP voucher holders under contract during 2018 and remained "over leased" as of January 2019 with 101 active FUP voucher holders under lease. As a result of routine participant turn-over the number of FUP voucher holders under contract is currently (as of February 2020) below the targeted 95 and SCCHA is working with IDCFS to obtain referrals sufficient to reach the targeted level.

Goal 12: Successfully administer the Section 8 Housing Choice Voucher Program – Family Self-Sufficiency Program, obtaining goals specified in HUD's E-Logic Model. Re-structure the FSS Program to provide for the enrollment of both Section 8 HCVP participants **and** public housing families as allowed by recent federal regulation changes.

Status: *Significant Progress Achieved.* A staffing change was made in March 2016 with very positive results being achieved. In February 2018 there were 41 participants under contract, including 5 public housing residents. As of January 2019 there were 50 active FSS participants under contract with 44 being HCVP participants and 6 public housing residents. Currently (February 2020) there are 39 active participants with 3 of those being from the public housing program. With active participants under contract returning to a level above the minimum of 25 needed to qualify for receipt of Full-Time Coordinator grant funding, SCCHA was successful in obtaining a full-time coordinator grant award in the 2017 and 2018 FSS grant funding application cycle, which will fund the Coordinator position during calendar years 2018 and 2019. SCCHA submitted an FSS Program Coordinator grant application in the last quarter of 2019 (the NOFA – Notice of Fund Availability --- was issued by HUD very late in the year). Other than electronic confirmation that the application was received no additional information regarding the status of the grant application has been received.

Goal 13: Partner with local stakeholders to identify and apply for potential grant opportunities designed to improve the physical condition of public housing properties and improve the social and economic conditions of the neighborhoods / communities in which they are located. Examples include, but are not necessarily limited to creating partnerships / collaborations to pursue Choice Neighborhoods Planning and/or Implementation Grant, Promise Zone Designations, and other potential grant funding / designation programs that are intended to holistically address the needs of the public

housing developments and residents and the neighborhoods / communities in which they are located.

Status: *Very Limited Progress.* Despite numerous meetings with various local stakeholders no specific grant applications have been submitted and no specific redevelopment plans have been formulated. Working relationships have been established and dialog continues with important community contacts, such as SWIDA (Southwestern Illinois Development Authority) and Southern Illinois Health Care Foundation. Community and public housing re-development is a difficult undertaking, especially in an era of very limited and competitive resources. Efforts toward this important undertaking will continue.

Goal 14: Within budgetary and regulatory constraints, continue utilization of Project Based Voucher Program to address the housing needs of special needs or at-risk populations (such as the elderly and/or persons with disabilities) and/or increase affordable housing options in non-impacted or opportunity communities (as defined by the Illinois Housing Development Authority).

Status: *Substantial Progress.* In response to a Request for Proposals (RFP), SCCHA received two proposals for Project-Based Vouchers. One requested 30 PBVs for a 72 unit senior development in O’Fallon and another for 16 PBVs for a 64 unit development in Swansea. Both proposals are located in IHDA designated “opportunity areas” and received PRB awards from the SCCHA Board of Commissioners. Both projects received HUD approval of the Environmental Reviews and Subsidy Layering Reviews and the Agreement to Enter into a Housing Assistance Payments Contracts (AHAPs) for both projects have been executed. The O’Fallon property went under HAPC in July 2018 and the Swansea development progressed to HAPC in February 2019. SCCHA issued another RFP for additional PBVs during calendar year 2019 and the Board of Commissioners awarded PBVs as noted below.

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

As of this writing, none of the above developments have progressed to A-HAPC stage (Agreement to Enter into a HAPC). SCCHA’s past PBV activity has increased the supply of affordable senior housing in high-demand areas of St. Clair County. The recent PBV awards have the potential to add additional senior units, but also increase the supply of new affordable family units.

Attachment #8 – Resident Advisory Board Comments

Attachment #9 – Certification by State or Local Officials

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

U. S Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 2/29/2016

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

I, RICHARD STUBBLEFIELD, the EXECUTIVE DIRECTOR, ST. CLAIR
COUNTY INTERGOVERNMENTAL
GRANTS DEPARTMENT
Official's Name *Official's Title*

certify that the 5-Year PHA Plan and/or Annual PHA Plan of the

ST. CLAIR COUNTY HOUSING AUTHORITY
PHA Name

is consistent with the Consolidated Plan or State Consolidated Plan and the Analysis of
Impediments (AI) to Fair Housing Choice of the

ST. CLAIR COUNTY
Local Jurisdiction Name

pursuant to 24 CFR Part 91.

Provide a description of how the PHA Plan is consistent with the Consolidated Plan or State
Consolidated Plan and the AI.

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

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

Name of Authorized Official	Title
RICHARD STUBBLEFIELD	EXECUTIVE DIRECTOR
Signature	Date

**Attachment #10A – Form HUD 50075.2 Capital Fund Program Annual Statement /
Performance and Evaluation Report for Fiscal Year 2017 Approved by
HUD on 8/16/17**

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 I: Summary

PHA Name: St. Clair County Housing

Authority

Grant Type and Number

Capital Fund Program Grant No: IL06P030501-17

Replacement Housing Factor Grant No:

Date of CFFP:

FFY of Grant: 2017

FFY of Grant Approval: 2017

LOCCS JANUARY 2020

Type of Grant

☐ Original Annual Statement

☐ Reserve for Disasters/Emergencies

☒ Revised Annual Statement (Revision #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	
1	Total non-CFP Funds					
2	1406 Operations (may not exceed 20% of line 21)	0.00	0.00	0.00	0.00	0.00
3	1408 Management Improvements	15,500.00	2,795.30	2,795.30	2,795.30	2,795.30
4	1410 Administration (may not exceed 10% of line 21)	125,506.00	125,506.00	125,506.00	125,506.00	125,506.00
5	1411 Audit					
6	1415 Liquidated Damages					
7	1430 Fees and Costs					
8	1440 Site Acquisition	74,303.00	78,610.50	78,610.50	78,610.50	78,610.50
9	1450 Site Improvement					
10	1460 Dwelling Structures	697,253.00	628,053.61	628,053.61	628,053.61	628,053.61
11	1465.1 Dwelling Equipment--Nonexpendable	325,000.00	390,598.89	390,598.89	390,598.89	390,598.89
12	1470 Non-dwelling Structures					
13	1475 Non-dwelling Equipment					
14	1485 Demolition					
15	1492 Moving to Work Demonstration					
16	1495.1 Relocation Costs	17,500.00	29,497.70	29,497.70	29,497.70	12,488.90
17	1499 Development Activities					

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

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 I: Summary		FFY of Grant: 2017	
PHA Name: St. Clair County Housing Authority		FFY of Grant Approval 2017	
Grant Type and Number			
Capital Fund Program Grant No: IL06E030501-17			
Replacement Housing Factor Grant No:			
Date of CFFP:		LOCCS JANUARY 2020	
Type of Grant			
<input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending:		<input checked="" type="checkbox"/> Revised Annual Statement (revision r #5) <input type="checkbox"/> Final Performance and Evaluation Report	
Line	Summary by Development Account	Total Estimated Cost	Total Actual Cost
		Original	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)	1,255,062.00	1,255,062.00 1,238,053.20
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	0.00	
24	Amount of line 20 Related to Security - Hard Costs	0.00	
25	Amount of line 20 Related to Energy Conservation Measures	0.00	
Signature of Executive Director		Signature of Public Housing Director	
Date		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

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

Office of Public and Indian Housing
OMB No. 2577-0226
Expires 8/31/2011

Part II: Supporting Pages									
PHA Name: St. Clair County Housing Authority				Grant Type and Number Capital Fund Program Grant No: IL06P030501-17 CFPP (Yes/No):			Federal FFY of Grant: 2017		
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Replacement Housing Factor Grant No:			January 2020-revision #5		
				Total Estimated Cost	Revised	Funds Obligated	Funds Expended	Status of Work	
AMP 2, Centreville, IL (SCCHA 30-10)	Resurface Street & Parking	1450	1	138,253.00	138,253.00	138,253.00	138,253.00	Complete	
AMP 2, Centreville, IL (SCCHA 30-80)	Resurface Street & Parking	1450	1	14,000.00	53,000.00	53,000.00	53,000.00	Complete	
AMP 2, Centreville, IL (SCCHA 30-60)	Resurface Street & Parking	1450	1	64,000.00	164,000.00	164,000.00	164,000.00	Complete	
AMP 3, Centreville, IL (SCCHA 30-06)	Resurface Street & Parking	1450	1	34,000.00	134,000.00	134,000.00	134,000.00	Complete	
AMP 3, Centreville, IL (SCCHA 30-08)	Resurface Parking & Site Improvements	1450	1	72,000.00	22,450.76	22,450.76	22,450.76	Complete	
AMP 4, Belleville, IL (SCCHA 30-16)	Parking & Site Improvements	1450	1	44,000.00	31,149.85	31,149.85	31,149.85	Complete	
AMP 4, Belleville, IL (SCCHA 30-61)	Parking & Patio Deck Coating	1450	2	299,000.00	0.00	0.00	0.00	Complete	
AMP 5, Lebanon, IL (SCCHA 30-14)	Roof Replacement	1460	13	149,000.00	198,548.74	198,548.74	198,548.74	Complete	
AMP 5 Lebanon, IL (SCCHA 30-14)	Exterior Building Improvements	1460	13	174,000.00	189,750.15	189,750.15	189,750.15	Complete	
AMP 5, Lebanon, IL (SCCHA 30-14)	Site Improvements	1450	5	24,000.00	84,000.00	84,000.00	84,000.00	Complete	

1 To be completed for the Performance and Evaluation Report
2 To be completed for the Performance and Evaluation Report or a

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 II: Supporting Pages			Federal FY of Grant: 2017			January 2020 - Revision #5		
PHA Name: St. Clair County Housing Authority		Grant Type and Number Capital Fund Program Grant No: IL06P030501-17 CFFP (Yes/No):		Replacement Housing Factor Grant No:		Status of Work		
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	
AMP 2, Centreville, IL (SCCHA 30-10)	SUPERVISION: Resurface Street & Parking	1450	1	1,000.00	0.00	0.00	0.00	Complete
AMP 2, Centreville, IL (SCCHA 30-80)	SUPERVISION: Resurface Street & Parking	1450	1	1,000.00	0.00	0.00	0.00	Complete
AMP 2, Centreville, IL (SCCHA 30-60)	SUPERVISION: Resurface Street & Parking	1450	1	1,000.00	500.00	500.00	500.00	Complete
AMP 3, Centreville, IL (SCCHA 30-06)	SUPERVISION: Resurface Street & Parking	1450	1	1,000.00	0.00	0.00	0.00	Complete
AMP 3, Centreville, IL (SCCHA 30-08)	SUPERVISION: Resurface Parking & Site Improv	1450	1	1,000.00	0.00	0.00	0.00	Complete
AMP 4, Belleville, IL (SCCHA 30-16)	SUPERVISION: Parking & Site Improvements	1450	1	1,000.00	200.00	200.00	200.00	Complete
AMP 4, Belleville, IL (SCCHA 30-61)	SUPERVISION: Parking & Patio Deck Coating	1450	2	1,000.00	0.00	0.00	0.00	Complete
AMP 5, Lebanon, IL (SCCHA 30-14)	SUPERVISION: Roof Replacement	1460	13	1,000.00	400.00	400.00	400.00	Complete
AMP 5, Lebanon, IL (SCCHA 30-14)	SUPERVISION: Exterior Building Improvements	1460	13	1,000.00	1,900.00	1,900.00	1,900.00	Complete
AMP 5, Lebanon, IL (SCCHA 30-14)	SUPERVISION: Site Improvements	1450	5	1,000.00	500.00	500.00	500.00	Complete

1 To be completed for the Performance and Evaluation Report
2 To be completed for the Performance and Evaluation Report or a

Part II: Supporting Pages												
PHA Name: St. Clair County Housing Authority				Grant Type and Number Capital Fund Program Grant No: IL06P030501-17 CFFP (Yes/No):				Federal FFY of Grant: 2017				
Development Number Name/PHA-Wide Activities		General Description of Major Work Categories		Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		January 2020 - Revision #5		
						Original		Revised		Funds Obligated		Funds Expended
PH Wide		Operating		1406		0.00						
PH Wide		Administration		1410		125,506.00		125,506.00		125,506.00		125,506.00
PH Wide		Architect & Engineer		1430		74,303.00		78,610.50		78,610.50		78,610.50
PH Wide		Management Improvements:										
		Management Staff Professional Develop.		1408		3,000.00		2,795.30		2,795.30		2,795.30
		Resident Council Development & Training		1408		10,000.00		0.00		0.00		0.00
		Software		1408		2,500.00		0.00		0.00		0.00
		Computers & Electronic Equipment		1475		17,500.00		29,497.70		29,497.70		12,488.90

1 To be completed for the Performance and Evaluation Report
2 To be completed for the Performance and Evaluation Report or a

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

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

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

**Attachment #10B – Form HUD 50075.2 Capital Fund Program Annual Statement /
Performance and Evaluation Report for Fiscal Year 2018 – Approved by
HUD on 5/29/18**

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 I: Summary		FFY of Grant: 2018 FFY of Grant Approval: 2018	
PHA Name: St. Clair County Housing Authority		Grant Type and Number Capital Fund Program Grant No: IL06P030501-18 Replacement Housing Factor Grant No: Date of CFFP:	
LOCCS JAN 2020-Rev #2			
Type of Grant			
<input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Performance and Evaluation Report for Period Ending: <input checked="" type="checkbox"/> Revised Annual Statement #2		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)	0.00	0.00 0.00 0.00
3	1408 Management Improvements	15,500.00	15,500.00 2,600.00 2,295.28
4	1410 Administration (may not exceed 10% of line 21)	234,635.00	234,635.00 234,635.00 234,635.00
5	1411 Audit		
6	1415 Liquidated Damages		
7	1430 Fees and Costs	144,184.70	144,184.70 124,976.00 100,393.20
8	1440 Site Acquisition		
9	1450 Site Improvement		
10	1460 Dwelling Structures		
11	1465.1 Dwelling Equipment--Nonexpendable		
12	1470 Non-dwelling Structures		
13	1475 Non-dwelling Equipment	17,500.00	36,113.31 36,113.31 14,140.35
14	1480 General Capital Activity	1,934,530.30	1,915,916.99 643,686.26 626,185.62
15	1485 Demolition		
16	1492 Moving to Work Demonstration		
17	1495.1 Relocation Costs		
18	1499 Development Activities		

- 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

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 I: Summary					
PHA Name: St. Clair County Housing Authority Grant Type and Number Capital Fund Program Grant No: IL06E030501-18 Replacement Housing Factor Grant No: Date of CFFP:	FFY of Grant: 2018 FFY of Grant Approval 2018 LOCCS JAN 2020-Rev #2				
<div style="display: flex; justify-content: space-between;"> <div> <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending: </div> <div> <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Performance and Evaluation Report for Period Ending: </div> <div> <input checked="" type="checkbox"/> Revised Annual Statement #2 <input type="checkbox"/> Final Performance and Evaluation Report </div> </div>					
Line	Summary by Development Account	Total Estimated Cost	Revised	Obligated	Total Actual Cost
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)	2,346,350.00	2,346,350.00	1,042,010.57	977,649.45
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	0.00			
24	Amount of line 20 Related to Security - Hard Costs	0.00			
25	Amount of line 20 Related to Energy Conservation Measures	0.00			
Signature of Executive Director		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

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

Office of Public and Indian Housing
OMB No. 2577-0226
Expires 8/31/2011

Part II: Supporting Pages				Federal FFY of Grant: 2018				
PHA Name: St. Clair County Housing Authority				(Grant Type and Number Capital Fund Program Grant No: IL06P030501-18 CFFP (Yes/No): Replacement Housing Factor Grant No:		January 2020 - Revision #2		
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	
AMP 1, Brooklyn, IL (SCCHA 30-12)	ADA and 504 Interior unit renovations	1480	2	79,000.00	79,000.00			
AMP 2, Centreville, IL (SCCHA 30-10, 80)	Electrical Panel Upgrades	1480	128	199,000.00	184,230.73			
AMP 3, Centreville, IL (SCCHA 30-20)	ADA and 504 Interior unit renovations	1480	1	39,000.00	39,000.00			
AMP 3, Centreville, IL (SCCHA 30-06)	Replace Roofing	1480	17	139,000.00	139,000.00	139,000.00	139,000.00	complete
AMP 4, Belleville, IL (SCCHA 30-61)	Parking Deck & Patio Coating, Waterproofing	1480	1	309,000.00	299,266.96	299,266.96	281,766.32	
AMP 4, Swansea, IL (SCCHA 30-18)	ADA and 504 Interior unit renovations	1480	2	39,000.00	39,000.00			
AMP 4, Belleville, IL (SCCHA 30-27)	HVAC and Water Heater Replacement	1480	65	519,000.00	519,000.00			
AMP 4, Belleville, IL (SCCHA 30-27)	Exterior Lighting	1480	9	9,000.00	9,000.00			
AMP 5 Lebanon, IL (SCCHA 30-14)	Resurface Street & Parking, Site Work	1480	1	37,933.30	39,326.45	39,326.45	39,326.45	complete
AMP 5, Washington Park, IL (SCCHA 30-17)	ADA and 504 Interior unit renovations	1480	2	79,000.00	79,000.00			
AMP 6, Smithton, IL (SCCHA 30-05)	Roof Replacement	1480	3	29,000.00	29,000.00	29,000.00	29,000.00	complete
AMP 6, Dupu, IL (SCCHA 30-03)	ADA and 504 Interior unit renovations	1480	5	65,000.00	65,000.00			

1 To be completed for the Performance and Evaluation Report

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 II: Supporting Pages			Grant Type and Number			Federal FFY of Grant: 2018		
PHA Name: St. Clair County Housing Authority			Capital Fund Program Grant No: IL06P030501-18					
CFPP (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	
AMP 6, New Athens, IL [SCCHA 30-13]	ADA and 504 Interior unit renovations	1480	1	65,000.00	65,000.00			
AMP 6, New Athens, IL [SCCHA 30-21]	ADA and 504 Interior unit renovations	1480	1	65,000.00	65,000.00			
AMP 6, Millstadt, IL [SCCHA 30-22]	ADA and 504 Interior unit renovations	1480	1	64,000.00	64,000.00			
AMP 6, Millstadt, IL [SCCHA 30-22]	Roof Replacement	1480	12	39,000.00	39,000.00	39,000.00	39,000.00	complete
AMP 6, Millstadt, IL [SCCHA 30-22]	Attic Insulation	1480	12	10,000.00	10,000.00	10,000.00	10,000.00	complete
AMP 6, New Athens, IL [SCCHA 30-13]	Window Replacement	1480	5	50,000.00	50,000.00			
AMP 6, New Athens, IL [SCCHA 30-13]	Attic Insulation	1480	5	14,000.00	14,000.00	14,000.00	14,000.00	complete
AMP 6, Lenzburg, IL [SCCHA 30-19]	Exterior Building Improvements and roofing	1480	4	29,597.00	29,597.00	29,597.00	29,597.00	complete
AMP 6, Lenzburg, IL [SCCHA 30-28]	Exterior Building Improvements and roofing	1480	5	40,000.00	44,495.85	44,495.85	44,495.85	complete
AMP 001	SUPERVISION: AMP 001	1480	13	1,000.00	1,000.00			
AMP 002	SUPERVISION: AMP 002	1480	128	1,000.00	1,000.00			
AMP 003	SUPERVISION: AMP 003	1480	4	2,000.00	2,000.00			
AMP 004	SUPERVISION: AMP 004	1480	9	4,000.00	4,000.00			
AMP 005	SUPERVISION: AMP 005	1480	2	2,000.00	2,000.00			
AMP 006	SUPERVISION: AMP 006	1480	12	5,000.00	5,000.00			

1 To be completed for the Performance and Evaluation Report
2 To be completed for the Performance and Evaluation Report or a

Part II: Supporting Pages				Federal FFY of Grant: 2018				January 2020 - Revision #2	
PHA Name: St. Clair County Housing Authority		Grant Type and Number		Capital Fund Program Grant No: IL06P030501-18		CFPP (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	Funds Obligated	Funds Expended	Total Actual Cost	Status of Work	
PH Wide	Operating	1406		Original 0.00	Revised 0.00				
PH Wide	Administration	1410		234,635.00	234,635.00	234,635.00	234,635.00	Complete	
PH Wide	Architect & Engineer	1430		144,184.70	144,184.70	100,393.20			
PH Wide	Management Improvements:								
	Management Staff Professional Develop.	1408		3,000.00	3,000.00	2,295.28			
	Resident Council Development & Training	1408		10,000.00	10,000.00				
	Software	1408		2,500.00	2,500.00				
	Computers & Electronic Equipment	1475		17,500.00	36,113.31	14,140.35			

1 To be completed for the Performance and Evaluation Report
2 To be completed for the Performance and Evaluation Report or a

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

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

[illegible]

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

**Attachment #10C – Form HUD 50075.2 Capital Fund Program Annual Statement /
Performance and Evaluation Report for Fiscal Year 2019 –
Approved by HUD on 5/5/19**

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 I: Summary		FFY of Grant: 2019	
PHA Name: St. Clair County Housing Authority		FFY of Grant Approval: 2019	
Grant Type and Number Capital Fund Program Grant No: IL06P030501-19 Replacement Housing Factor Grant No: Date of CFFP:		LOCCS JANUARY 2020	

Type of Grant		<input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending: <input type="checkbox"/> Final Performance and Evaluation Report	
Line	Summary by Development Account	Total Estimated Cost	Total Actual Cost
		Original	Obligated Expended
1	Total non-CFP Funds		
2	1406 Operations (may not exceed 20% of line 21)		
3	1408 Management Improvements	15,500.00	1,558.00 0.00
4	1410 Administration (may not exceed 10% of line 21)	244,260.80	244,260.80 244,260.80
5	1411 Audit		
6	1415 Liquidated Damages		
7	1430 Fees and Costs		
8	1440 Site Acquisition	151,574.30	118,000.00 16,471.95
9	1450 Site Improvement		
10	1460 Dwelling Structures		
11	1465.1 Dwelling Equipment--Nonexpendable		
12	1470 Non-dwelling Structures		
13	1475 Non-dwelling Equipment		
14	1480 General Capital Activity	17,500.00	17,500.00 0.00
15	1485 Demolition	2,013,772.90	6,534.00 6,834.00
16	1492 Moving to Work Demonstration		
17	1495.1 Relocation Costs		
18	1499 Development Activities		

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

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 I: Summary

PHA Name: St. Clair County Housing Authority	Grant Type and Number Capital Fund Program Grant No: IL06E030501-19 Replacement Housing Factor Grant No: Date of CFFP:	FFY of Grant: 2019 FFY of Grant Approval 2019
		LOCCS JANUARY 2020

Type of Grant	<input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending: <input type="checkbox"/> 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)	2,442,608.00	0.00	387,852.80 267,566.75
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	0.00		
24	Amount of line 20 Related to Security - Hard Costs	0.00		
25	Amount of line 20 Related to Energy Conservation Measures	0.00		
Signature of Executive Director		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

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

Office of Public and Indian Housing
OMB No. 2577-0226
Expires 06/30/2017

Part II: Supporting Pages							
PHA Name: St. Clair County Housing Authority			Grant Type and Number Capital Fund Program Grant No: IL06P030501-19 CFPP (Yes/No):		Federal FFY of Grant: 2019		
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		January 2020 Total Actual Cost	Status of Work
				Original	Revised		
AMP 1, Brooklyn, IL (SCCHA IL30-9)	Door renovations & Window Installation	1480	42	39,000.00			
AMP 1, Brooklyn, IL (SCCHA IL30-1 & 9)	Security Lighting	1480	142	29,000.00			
AMP 1, Brooklyn, IL (SCCHA IL30-12)	Kitchen and Bathroom Renovations	1480	16	159,000.00			
AMP 1, Brooklyn, IL (SCCHA IL30-12)	Ceiling and Wall Replacement	1480	16	40,000.00			
AMP 2, Centreville, IL (SCCHA IL30-10)	HVAC Replacement and Mechanical Renovations	1480	55	549,000.00			
AMP 2, Centreville, IL (SCCHA IL30-60)	Electrical Panel Upgrades	1480	87	175,000.00			
AMP 2, Centreville, IL (SCCHA IL30-60)	Playground Equipment	1480	1	59,000.00		4,934.00	5,234.00
AMP 3, Centreville, IL (SCCHA IL30-6)	Electrical Panel Upgrades	1480	51	101,000.00			
AMP 4, Belleville, IL (SCCHA IL30-16, 61)	Roof vents, Boiler Replacement; Smoke detector replacement, exhaust vents and baseboard & bathroom lights/heaters	1480	2	472,597.00		1,600.00	1,600.00
AMP 4, Belleville, IL (SCCHA IL30-27)	HVAC Replacement	1480	2	108,175.90			

1 To be completed for the Performance and Evaluation Report
2 To be completed for the Performance and Evaluation Report or a

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

Office of Public and Indian Housing
OMB No. 2577-0226
Expires 06/30/2017

1 To be completed for the Performance and Evaluation Report
2 To be completed for the Performance and Evaluation Report or a

1 To be completed for the Performance and Evaluation Report
2 To be completed for the Performance and Evaluation Report or a

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 6/30/2017

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

Attachment #10-D - Capital Fund Program Five-Year Action Plan

Capital Fund Program – Five Year Action Plan

Part I: Summary

PHA Name/Number St. Clair County Housing Authority IL06P030		Locality (City/County & State) Belleville, IL		<input checked="" type="checkbox"/> Original 5-Year Plan	<input type="checkbox"/> Revision No:
Development Number and Name	Work Statement for Year 1 FFY <u>2020</u>	Work Statement for Year 2 FFY <u>2021</u>	Work Statement for Year 3 FFY <u>2022</u>	Work Statement for Year 4 FFY <u>2023</u>	Work Statement for Year 5 FFY <u>2024</u>
	Annual Statement				
A. Physical Improvements Subtotal		1,915,597	1,915,597	1,465,000	1,638,097
B. Management Improvements		15,500	15,500	15,500	15,500
C. PHA-Wide Non-dwelling Structures and Equipment		17,500	17,500	17,500	17,500
D. Administration		232,531.30	232,531.30	232,531.30	232,531.30
E. Other		144,184.70	144,184.70	144,184.70	144,184.70
F. Operations		0	0	0	0
G. Demolition				450,597	277,500
H. Development					
I. Capital Fund Financing – Debt Service					
J. Total CFP Funds					
K. Total Non-CFP Funds					
Grand Total		2,325,313	2,325,313	2,325,313	2,325,313

Part I: Summary (Continuation)

PHA Name/Number St. Clair County Housing Authority IL06P030		Locality (City/county & State) Belleville, IL		<input checked="" type="checkbox"/> Original 5-Year Plan	<input type="checkbox"/> Revision No:
Development Number and Name	Work Statement for Year 1 FFY <u>2020</u>	Work Statement for Year 2 FFY <u>2021</u>	Work Statement for Year 3 FFY <u>2022</u>	Work Statement for Year 4 FFY <u>2023</u>	Work Statement for Year 5 FFY <u>2024</u>
IL0300001	Annual Statement	0	126,000	61,597	0
IL0300002		150,000	0	0	0
IL0300003		140,000	0	450,597	535,000
IL0300004		700,597	1,457,597	755,403	310,597
IL0300005		559,000	232,000	0	350,000
IL0300006		366,000	100,000	648,000	720,000
Total		1,915,597	1,915,597	1,915,597	1,915,597

Capital Fund Program – Five Year Action Plan

Part II: Supporting Pages – Physical Needs Work Statement(s)

Work Statement for Year 1 FFY 2020	Work Statement for Year Two FFY 2021			Work Statement for Year Three FFY 2022		
	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost
See	IL0300002/IL30-10 Centreville. Resurface Streets	1	150,000	IL0300001/IL30-09 Brooklyn. Replace HVAC and Water Heaters	42	126,000
Annual	IL0300003/IL30-06 Centreville. Resurface Streets	1	140,000	IL0300004/IL30-27 Belleville. Kitchen and Bathroom Renovation	64	650,000
Statement	IL0300004/IL30-16/61 Belleville. Replace individual heat pumps	86	700,597	IL0300004/IL30-27 Belleville. Flooring Replacement	64	190,000
	IL0300005/IL30-17 Washington Park. Kitchen and Bathroom renovations	32	375,000	IL0300004/IL30-27 Belleville. Wall Repairs	64	64,000
	IL0300005/IL30-17 Washington Park. Flooring Replacement	32	100,000	IL0300004/IL30-16/61 Belleville. Kitchen and Bathroom Renovation	86	468,597
	IL0300005/IL30-17 Washington Park. Wall Repairs	32	36,000	IL0300004/IL30-16/61 Belleville. Flooring Replacement	86	75,000
	IL0300005/IL30-17 Washington Park. Security Screen Replacement	16	48,000	IL0300004/IL30-16/61 Belleville. Replace Individual heat pumps	86	10,000
	IL0300006/IL30-21, New Athens, Kitchen and Bathroom Renovation	16	190,000	IL0300005/IL30-24 O'Fallon. A/C replacement	20	160,000
	IL0300006/IL30-21, New Athens, Flooring Replacement	16	50,000	IL0300005/IL30-14 Lebanon. A/C replacement	16	72,000
	Year 2 Sub-Total		1,789,597	Year 3 Sub-Total		1,815,597

Capital Fund Program – Five Year Action Plan
Part II: Supporting Pages – Physical Needs Work Statement(s)

[illegible]

Capital Fund Program – Five Year Action Plan

Part II: Supporting Pages – Physical Needs Work Statement(s)

Work Statement for Year 1 FFY 2020	Work Statement for Year <u>Four</u> FFY 2023			Work Statement for Year: <u>Five</u> FFY 2024		
	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost
See	IL0300001/IL30-09 Brooklyn. Storm Water Force Main pump replacement	1	61,597	IL0300003/IL30-06 Centreville. High-rise Demolition	1	277,500
Annual	IL0300003/IL30-08 Centreville. Building Demolition	6	450,597	IL0300003/IL30-06 Centreville. Sanitary Sewer line replacement	1	177,500
Statement	IL0300004/IL30-16/61 Belleville. Kitchen and Bathroom Renovation	86	534,403	IL0300003/IL30-08 Centreville. Relocate Security system head-end	1	40,000
	IL0300004/IL30-16/61 Belleville. Flooring Replacement	86	135,000	IL0300003/IL30-20 Centreville. HVAC and water heater replacement	8	40,000
	IL0300004/IL30-16/61 Belleville. Wall Repairs	86	86,000	IL0300004/IL30-18 Swansea. HVAC and water heater replacement	16	160,000
	IL0300006/IL30-02 Marissa. Kitchen and Bathroom Renovations	18	225,000	IL0300004/IL30-27 Belleville. Resurface Streets	1	150,597
	IL0300006/IL30-02 Marissa. Flooring Replacement	18	90,000	IL0300005/IL30-14 O'Fallon. Kitchen and Bathroom Renovation	20	250,000
	IL0300006/IL30-02 Marissa. Wall Repairs	18	18,000	IL0300005/IL30-14 O'Fallon. Flooring Replacement	20	75,000
	IL0300006/IL30-03 Dupo. Kitchen and Bathroom Renovations	20	250,000	IL0300005/IL30-14 O'Fallon. Wall repairs	20	20,000
	Year 4 Sub-Total		1,850,597	Year 5 Sub-Total		1,190,597

Capital Fund Program – Five Year Action Plan

Part II: Supporting Pages -- Physical Needs Work Statement(s)

Work Statement for Year 1 FFY <u>2020</u>	Work Statement for Year <u>Four</u> FFY <u>2023</u>			Work Statement for Year: <u>Five</u> FFY <u>2024</u>		
	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost
See	IL0300006/IL30-03 Dupo. Flooring Replacement	20	45,000	IL0300006/IL30-22 Millstadt. Kitchen and Bathroom Renovation	20	225,000
Annual	IL03000006/IL30-03 Dupo. Wall Repairs	20	20,000	IL0300006/IL30-22 Millstadt. Flooring Replacement	20	75,000
Statement				IL0300006/IL30-22 Millstadt. Wall Repair	20	20,000
				IL0300006/IL30-22 Millstadt. HVAC Replacement	20	140,000
				IL0300006/IL30-19 Lenzburg HVAC Replacement	8	80,000
				IL0300006/IL30-28 Lenzburg HVAC Replacement	8	80,000
				IL0300006/IL30-21, New Athens. HVAC Replacement	16	100,000
	Year 4 Total		1,915,597	Year 5 Total		1,915,597

Capital Fund Program – Five Year Action Plan

Part III: Supporting Pages -- Management Needs Work Statement(s)

[illegible]

Capital Fund Program – Five Year Action Plan

Part III: Supporting Pages – Management Needs Work Statement(s)

[illegible]

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 06/30/2017

Part I: Summary		Grant Type and Number Capital Fund Program Grant No: IL06P030501-20 Replacement Housing Factor Grant No: Date of CFFP:		FFY of Grant: 2020 FFY of Grant Approval: 2020	
PHA Name: St. Clair County Housing Authority					
Type of Grant <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending:		<input type="checkbox"/> Reserve for Disasters/Emergencies		<input type="checkbox"/> Revised Annual Statement (revision no:)	
Summary by Development Account		Total Estimated Cost		Total Actual Cost¹	
Line		Original	Revised²	Obligated	Expended
1	Total non-CFF Funds				
2	1406 Operations (may not exceed 20% of line 21) ³	0			
3	1408 Management Improvements	15,500			
4	1410 Administration (may not exceed 10% of line 21)	232,531.30			
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs	144,184.70			
8	1440 Site Acquisition				
9	1450 Site Improvement	0			
10	1460 Dwelling Structures	1,915,597			
11	1465.1 Dwelling Equipment—Nonexpendable				
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment	17,500			
14	1485 Demolition				
15	1492 Moving to Work Demonstration				
16	1495.1 Relocation Costs				
17	1499 Development Activities ⁴				

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 CFF Grants for operations.

⁴ RHF funds shall be included here.

**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

Part I: Summary					
PHA Name: St. Clair County Housing Authority	Grant Type and Number Capital Fund Program Grant No. IL06P030501-20 Replacement Housing Factor Grant No: Date of CFFP:	FFY of Grant: 2020 FFY of Grant Approval: 2020			
Type of Grant <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending:		<input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no:) <input type="checkbox"/> Final Performance and Evaluation Report			
Line	Summary by Development Account	Total Estimated Cost	Revised ²	Obligated	Total Actual Cost ¹
		Original			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)	2,325,313			
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	

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 CFFP Grants for operations.
⁴ RHF funds shall be included here.

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

Part II: Supporting Pages									
PHA Name: St. Clair County Housing Authority				Grant Type and Number Capital Fund Program Grant No: IL06P030501-20 CFFP (Yes/ No): Replacement Housing Factor Grant No:				Federal FFY of Grant: 2020	
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 ¹	Funds Obligated ²	Funds Expended ²		
AMP 2, Centreville, IL (SCCHA 30-80)	HVAC Replacement	1480	16	100,000					
AMP 2, Centreville, IL (SCCHA30-10)	HVAC replacement and Mechanical Room Renovations	1480	110	860,597					
AMP 3, Centreville, IL (SCCHA IL30-06)	Relocate security system head-end	1480	1	80,000					
AMP 3, Centreville, IL (SCCHA IL30-20)	Kitchen and Bathroom Renovation	1480	8	100,000					
AMP 3, Centreville, IL (SCCHA IL30-20)	Flooring Replacement	1480	8	30,000					
AMP 3, Centreville, IL (SCCHA IL30-20)	Wall repairs	1480	8	10,000					
AMP 4, Swansea, IL (SCCHA 30-18)	Kitchen and Bathroom Renovations	1480	16	200,000					
AMP 4, Swansea, IL (SCCHA 30-18)	Flooring Replacement	1480	16	61,000					
AMP 4, Swansea, IL (SCCHA 30-18)	Wall Repairs	1480	16	15,000					
AMP 6, Smithton, IL (SCCHA 30-05)	Kitchen and Bathroom Renovation	1480	10	125,000					
AMP 6, Smithton IL (SCCHA 30-05)	Flooring Replacement	1480	10	30,000					

¹ To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

² To be completed for the Performance and Evaluation Report.

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

Part II: Supporting Pages			Federal FFY of Grant: 2017			
PHA Name: St. Clair County Housing Authority		Grant Type and Number Capital Fund Program Grant No: IL06P030501-17 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 Original Revised ¹	Total Actual Cost Funds Obligated ² Funds Expended ²	Status of Work
AMP 6, Smithton IL (SCCHA 30-05)	Wall Repairs	1480	10	10,000		
AMP 6, New Athens, IL (SCCHA 30-13)	Kitchen and Bathroom Renovation	1480	16	190,000		
AMP 6, New Athens, IL (SCCHA 30-13)	Flooring Replacement	1480	16	60,000		
AMP 6, New Athens, IL (SCCHA 30-13)	Wall Repairs	1480	16	16,000		
AMP 6, New Athens, IL (SCCHA 30-21)	Kitchen and Bathroom Renovation	1480	16	28,000		

¹ To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

² To be completed for the Performance and Evaluation Report.

Part II: Supporting Pages									
PHA Name: St. Clair County Housing Authority			Grant Type and Number Capital Fund Program Grant No: IL06P030501-20 CFPP (Yes/ No): Replacement Housing Factor Grant No:			Federal FFY of Grant: 2020			
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 ¹	Funds Obligated ²	Funds Expended ²		
PH Wide	Administration	1410		232,531.30					
PH Wide	Architect and Engineer	1430		144,184.70					
PH Wide	Management Improvements:								
	Management Staff Professional Development	1408		3,000					
	Resident Council Development and Training	1408		10,000					
	Software	1408		2,500					
	Computers and Electronic Equipment	1475		17,500					

¹ To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

² To be completed for the Performance and Evaluation Report.

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226

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.

**Attachment #10E – 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 and maintenance staff. Training in various functional aspects of positions including asset management, effective supervision, recertification, computer operation, accounting, etc.	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	\$0*
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 (Especially Centreville, Brooklyn, Alorton). Provide comprehensive drug elimination strategy including proactive law enforcement, prevention programs, and public awareness.	2	\$0*
D) Computer hardware & software and other electronic equipment to upgrade management information and other systems as necessary to ensure effective asset management practices, 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		\$165,000
Date Assessment Prepared		1/2020
Source(s) of Information:		
Public Housing Assessment System TARS reports Prior Management Needs Assessment RAB Input	Resident Feedback Regulatory Notices Financial & Management Audits	

1/7/2020

Public Housing Capital Fund Program
Management Improvements
Five Year Plan

Work Item Description	2020	2021	2022	2023	2024	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	\$0	\$0	\$0	\$0	\$0	\$0
Resident Council Development & Training	\$10,000	\$10,000	\$10,000	\$10,000	\$10,000	\$50,000
Security, Crime Prevention / Elimination Programs & Activities	\$0	\$0	\$0	\$0	\$0	\$0
Computer Software	\$2,500	\$2,500	\$2,500	\$2,500	\$2,500	\$12,500
Sub-total	\$15,500	\$15,500	\$15,500	\$15,500	\$15,500	\$77,500
Computers & Electronic Equipment	\$17,500	\$17,500	\$17,500	\$17,500	\$17,500	\$87,500
Total	\$33,000	\$33,000	\$33,000	\$33,000	\$33,000	\$165,000

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 Housing Choice Voucher Program (HCVP) Programs to comply with the requirements of the Illinois Carbon Monoxide Alarm Detector (CMAD) Act, which went into effect January 1, 2007.

Compliance activities completed on or before January 1, 2007 included, but were not necessarily limited to the installation of Carbon Monoxide Detectors where required by law in all units owned / operated by SCCCHA, 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.

Attachment #12 – Certification of No Challenged Elements

Attachment #12 – Certification of No Challenged Elements

The St. Clair County Housing Authority certifies and attests that during and after the close of the **45 day Resident Comment Period and the Public Hearing held on March 30, 2020** no elements of the Five Year Agency Plan were challenged.

Certified by: _____ Date: _____
Larry McLean, Executive Director

**Attachment #13 - Statement Regarding Use of Project-Based Vouchers, Mixed Finance,
Modernization or Development, Demolition and/or Disposition, and
Conversion of Public Housing**

Attachment #13

Part 1 - Statement Regarding Use of Project-Based Vouchers

The SCCHA established its discretionary authority to operate a project-based voucher (PBV) component of its Section 8 Housing Choice Voucher Program in 2006, exercising this option under the October 13, 2005 final rule. An updated Final Rule regarding PBV was issued June 25, 2014. 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.

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

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

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

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

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

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

None of these projects have progressed to the A-HAP (Agreement to Enter into a Housing Assistance Payments Contract) stage as of this date.

SCCHA desires to support the affordable housing initiatives of St. Clair County and other municipalities in its jurisdiction using the PBV program and anticipates issuing a RFP during the remaining months of FYE 6/30/19 and/or during the upcoming FYE-6/30/20.

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

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

SCCHA plans to submit a second demolition application during calendar year 2020 targeting the remaining one-hundred-six (106) family units in the ESSA development that are part of project #30-08.

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

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

- The long-term viability of the remaining portions of the ESSA development in Centreville (30-06 and 30-20). SCCHA hopes to develop a re-positioning plan that provides for the continued operation of these federally-assisted rental units. However, the area where these units are located is impacted by storm and sanitary sewer systems that are not functioning properly and result in frequent back-ups in the units. SCCHA hopes to work with the other stakeholders, which include but are not limited to the City of Centreville, Centreville Township, Commonfields of Cahokia (the sewer provider) and

St. Clair County to develop a plan for the repair / upgrade of the storm and sanitary sewer system so that it is possible to keep these units viable in the future.

- The long-term viability of the Thomas Terry Apartments in Brooklyn, a public housing property that consists of a total of one-hundred-fifty-six (156) units comprised of three separate developments (100 family units known as 30-01, 44 family units known as 30-09, and 16 family units known as 30-12). The Village of Brooklyn has very high concentrations of poverty and minorities. There are almost no businesses or services available in the Village. Adult entertainment facilities represent the Village's most common commercial business concerns. This development will be extremely difficult to "re-position" using private equity and/or low-income housing tax credits because of the location factors mentioned. Compounding the problem, the public streets that service the development are in a terrible state of disrepair and the Village does not have the funds to repair the streets. SCCHA must give serious and careful consideration to the possibility that demolition of these public housing units is the most logical and practical decision. This is certainly the case unless the Village of Brooklyn and/or other entity(ies) working together cannot make a commitment to repair the streets in the near future.
- The long-term viability of the thirty-two unit scattered site development located in the Village of Washington Park. This community is highly concentrated in terms of poverty and minority population. Washington Park is plagued by a high crime rate. Most of the city streets are in serious states of disrepair. There are many vacant, vandalized and burned-out structures through-out the community. SCCHA has to question if it is "fair and just" to continue to offer federally-assisted housing in this devastated community.
- SCCHA expects to submit a RAD conversion application during the upcoming plan period to convert one or more of its public housing properties to the Project Based Rental Assistance (PBRA) federal funding platform. At this time the most likely candidates for a RAD conversion are one or more of the properties known as AMP 2 (Centreville and Alorton), AMP 4 (Belleville / Swansea), AMP 5 (O'Fallon and Lebanon) and AMP 6 (Marissa, Lenzburg, New Athens, Smithton, Millstadt and Dupo).

Attachment #14 – Five (5) Year Plan Goals for PHA Fiscal Years 2021 – 2025

5-YEAR PLAN PHA FISCAL YEARS 2021 - 2025

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 and persons with disabilities maintaining an independent lifestyle. SCCHA is committed to providing its services in an efficient, economical, non-discriminatory and legally responsible manner.

B. Goals

The goals of the St. Clair County Housing Authority for the fiscal years 2021 through 2025 are:

1. Expand the supply of assisted housing by reducing public housing vacancies and leveraging private or other public funds to create additional affordable housing opportunities in the community.
2. Improve the quality of assisted housing through improved public housing and voucher management and renovating or modernizing the public housing stock using Capital Fund Program and/or other “re-positioning” strategies available, such as the Rental Assistance Demonstration (RAD) Program.
3. Achieve “High Performer” Status under both the Public Housing Assessment System (PHAS) and the Section 8 Management Assessment Program (SEMAP).
4. Increasing assisted housing choices by providing voucher mobility counseling, conducting outreach efforts to potential voucher landlords, maintaining voucher payment standards at highest possible level (up to 100% of the FMR) after determining total units under contract needed to earn requisite administrative fee for program viability and continued utilization of site-based wait lists for the public housing program.
5. 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.
6. Promote financial self-sufficiency and asset accumulation among families and individuals through the Family Self-Sufficiency Program, establishing linkages with support service providers to improve residents’ / participants’ employability;
7. Allow senior citizens and/or families with disabilities to retain independent housing situation as long as practical / reasonable through the Senior Service Coordinator Program.

8. Ensure equal housing opportunity for all persons and/or families seeking to live or living in assisted housing regardless of race, color, religion, national origin, sex, familial status, disability, sexual orientation and/or gender identification.
9. Continue implementation of and update (as needed) SCCHA's Section 504 Transition Plan for public housing program and other operations.
10. Update or complete new physical needs assessment for all public housing properties and use information to determine future of the public housing portfolio. Potential options include, but are not limited to keeping properties or parts thereof as traditional public housing; demolition when warranted by physical condition, functional obsolescence, neighborhood, or other factors; and conversion to Project Based Rental Assistance (PBRA).
11. As indicated by the results of the physical needs assessments (traditional and/or new "green" concept) work with Housing Development Partner, St. Clair County Housing Development, LLC, to plan and implement replacement housing options for public housing developments or portions thereof determined functionally obsolete or otherwise not physically viable in the long-term.
12. Complete the HUD-approved demolition of the Adeline James Building (32 unit senior building) and the #30-08 portion of the Ernest Smith Sr. Apartments (ESSA) located on South 46th Street (consisting of 5 buildings and 20 family units) also known as AMP 3 in Centreville.
13. Provide relocation assistance to residents impacted by approved demolition activity
14. Apply for and receive Replacement Tenant Protection Vouchers (TPV's) for the fifty-two public housing units approved for demolition.
15. Pursue second phase of #30-08 demolition involving the remaining 106 family units in the ESSA, AMP 3 Centreville, including providing the required resident relocation assistance / benefits and applying for Relocation Tenant Protection Vouchers.
16. Pursuant to goals #2, #10 and #11, SCCHA anticipates submission of a RAD application(s) involving all of or portions of the properties included in AMP 1 (Brooklyn*), AMP 2 (Private Mathison Manor – Centreville), AMP 3 (the #30-06 and #30-20) in Centreville**, AMP 4 (Belleville and Swansea senior building), AMP 5 (Washington Park***, O'Fallon, and Lebanon), and AMP 6 (Marissa, Lenzburg, New Athens, Smithton, Millstadt and Dupo).

*SCCHA hopes to retain its public housing presence in the Village of Brooklyn. However, the Village-owned streets that service the development are in serious disrepair. Without a commitment from the Village (or other entity) to repair the streets, SCCHA will be forced to pursue demolition of the property. The future viability of the public housing units in Brooklyn is also impacted by a high concentration of poverty (44.4% of the population has incomes below the poverty line) and highly segregated population (approximately 96% of the population is African-American).

**SCCHA hopes to retain the (#30-06 and #30-20 portions of the ESSA in Centreville (AMP 3). However the storm and sanitary sewers that service these buildings are in

serious disrepair resulting in frequent flooded streets and sewer drain back-ups in the units. Without a commitment from Commonfields of Cahokia (and/or other entities) to make the necessary storm and sanitary sewer upgrades, SCCHA will be forced to pursue demolition of the property. Centreville is also plagued by poverty (with a 45.6% overall poverty rate) and racial concentration (95.4% of the population in African-American).

***The long-term viability of the Washington Park public housing units is questionable because of conditions and characteristics of the community. The public housing units consist of 32 units on scattered sites. Many of the streets in the community are in serious disrepair. Also, many of the public housing units are located on streets where most, if not all, of the surrounding dwellings are burned-out, heavily vandalized or have been completely cleared, leaving overgrown lots. Washington Park is also distressed economically, with the poverty rate nearly 45% of the population. It is also a racially concentrated community with African Americans accounting for 92% of the population. It is questionable whether or not SCCHA should work to maintain its public housing presence in this seriously distressed community.

Attachment #15 – Plan Goals for Agency Plan Fiscal Year 2021 (Year 1 of 5)

ANNUAL PLAN GOALS FOR JULY 1, 2020 – JUNE 30, 2021

- 1) Maintain “Standard Performer” designation under Public Housing Assessment System (PHAS) or replacement assessment program introduced by HUD. Potential for lower rating is increasingly possible due to the number of public housing vacancies resulting from approved and planned demolition activities.
- 2) Maintain “High Performer” designation under the Section 8 Management Assessment Program (SEMAP), or any replacement assessment program introduced by HUD, for the Housing Choice Voucher Program (HCVP).
- 3) Continue to utilize Capital Fund Program (CFP) and any other funds available to upgrade / modernize the public housing stock consistent with the Five Year CFP Plan, the most current physical needs assessment (PNA) and the “Green” PNA covering all AMPs. *Note: Until and unless any of public housing properties or converted under RAD or other “re-positioning” program or strategy.*
- 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, but not limited to unit inspections by maintenance and/or management personnel. Also, continue to move toward full compliance with Illinois law requiring the installation of ten-year sealed-battery smoke detectors (in lieu of smoke detectors with removable battery) no later than the end of 2022.
- 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 all federal housing programs administered.
- 8) Complete all activities related to the HUD-approved demolition of the Adeline James Building (32 senior units) and the Ernest Smith Sr. Apartments (ESSA) --- the five buildings (20 family units on South 46th Street), including but not limited to receiving Replacement Tenant Protection Vouchers, resident relocation and building demolition.
- 9) Submit an application to HUD’s Special Application Center (SAC) for the demolition of the remaining 106 family units in the portion of the Ernest Smith Sr. Apartments in Centreville known as IL030-008. In related action, apply for

Replacement Tenant Protection Vouchers to facilitate the relocation of the households displaced by the planned public housing demolition activities.

- 10) Submit a RAD application(s) involving all or portions of the properties included in AMP 1 (Brooklyn), AMP 2 (Private Mathison Manor – Centreville), AMP 3 (the #30-06 and #30-20 portion of the ESSA property in Centreville), AMP (Belleville and Swansea senior buildings), AMP 5 (Washington Park, O'Fallon and Lebanon) and/or AMP 6 (Marissa, Lenzburg, New Athens, Smithton, Millstadt and Dupo). *Note: See Comments in Five Year Plan Goals Regarding Brooklyn, Washington Park and Centreville (Ernest Smith Sr. Apartments) locations.***
- 11) Work with the Illinois Department of Children and Family Services (IDCFS) to successfully administer Family Unification Program (FUP) Vouchers by maintaining the targeted 95 FUP households under contract.**
- 12) Successfully administer a Family Self-Sufficiency Program serving both Housing Choice Voucher Program participants and public housing residents, while meeting or exceeding HUD's established performance measures and maintaining minimum participation level required to qualify for a full-time FSS Program Coordinator.**
- 13) Within budgetary and regulatory constraints, continue utilization of Project Based-Voucher Program to address the housing needs of special needs or at-risk populations (such as the elderly and/or persons with disabilities) and/or increase affordable housing options in non-impacted or opportunity communities (as defined by the Illinois Housing Development Authority).**

Attachment #16 – Significant Deviation and Modification Statement

Attachment #16

**CRITERIA FOR SUBSTANTIAL DEVIATIONS AND SIGNIFICANT
AMENDMENTS / MODIFICATIONS TO THE PHA PLAN**

The St. Clair County Housing Authority (SCCHA) establishes the following criteria for substantial deviations and significant amendments to its Agency Plan:

- **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.**

PHA PLAN ELEMENTS

**2020 AGENCY PLAN
SUMMARY OF PHA PLAN ELEMENTS**

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

PART 2 – Rent Determination Policies

PART 3 – Operation and Management

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

PART 5 – Designated Housing for Elderly and Disabled Families

PART 6 – Community Service and Self-Sufficiency

PART 7 – Safety and Crime Prevention

PART 8 – Pet Policy (Public Housing Program)

PART 9 – Narrative Statement Regarding Prior Fiscal Year Audit

PART 10 – Violence Against Women Act (VAWA) Statement and Policy Excerpts

PART 11 – Smoke-Free Public Housing Policy

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 last revised in Agency Plan Update 2012*):

- Working families and those unable to work because of age or disability (2 point preference)*
- Veterans or their spouse or widow (1 point preference)
- Residents who live and/or work in the jurisdiction (10 point preference)
- Unmet housing need (1 point) **
- Law enforcement officers and teachers (actively employed) [6 preference points]
- Self-sufficiency re-admission (10 preference points)
- Inter-program transfers (for accommodation purposes) [7 preference points]
- Local Disaster Victims (5 preference points)

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

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

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

(5) Occupancy

- a. Applicants and residents can use the following reference materials to obtain information about the rules of occupancy of public housing;
 - The PHA-resident lease
 - The PHA's Admissions and (Continued) Occupancy policy
 - PHA briefing seminars or 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 last revised in Agency Plan Update 2012*):

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

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

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

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

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

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

PHA PLAN ELEMENT – PART 2
Rent Determination Policies

Rent Determination Policies

[24 CFR Part 903.7 9 (d)]

A. Public Housing

(1) Income Based Rent Policies

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

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

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

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

(2) Ceiling Rents

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

(3) Interim Reporting Requirements

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

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

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

(4) Flat Rents

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

- The section 8 rent reasonableness study of comparable housing
- Survey of rents listed in local newspaper
- Survey of similar unassisted units in the neighborhood
- HUD's requirement to set the public housing flat rents at a minimum of 80% of the HUD established Fair Market Rents for the locality.

B. Section 8 Housing Choice Voucher Program (HCVP)

(1) Payment Standards

The payment standard is currently set at approximately 95% 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 3
Operation and Management

OPERATION AND MANAGEMENT

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

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

B. HUD Programs Under PHA Management

The SCCHA administers the following federal programs. Also provided below is the number of families being served as of the January 1, 2020 and estimated turnover for each program.

	Families Served	Projected Annual Turnover**
Public Housing	924 (1/1/2020)	@ 20%
Section 8 HCVP	2,317 (1/1/2020)	@ 11%
Other *	46 (1/1/2020)	@ 7%

*Includes Rural Development and Section 8 Projected Based Units

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

C. Management and Maintenance Policies

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

(1) Public Housing Maintenance and Management:

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

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

(2) Section 8 HCVP Management:

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

PHA PLAN ELEMENT --- PART 4
Grievance Procedures (Public Housing and Section 8 HCV Program)

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

I. DEFINITIONS

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

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

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

II. GRIEVANCE PROCESS

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

Step #1 – Request for Reconsideration.

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

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

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

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

Step #2 – Review by Departmental Director

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

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

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

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

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

Step #3 – Review by Executive Director.

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

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

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

III. PROCEDURAL MATTERS

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

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

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

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

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

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

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

IV. SECTION 504 DISCRIMINATION COMPLAINTS BY PERSONS WITH DISABILITIES

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

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

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

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

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

PLAN ELEMENT --- PART 4 (Continued)

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 5
Designated Housing for Elderly and Disabled Families

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 each two year period since with the last renewal being effective May 1, 2018. SCCHA will request another two (2) year renewal from HUD when the current plan expires April 30, 2020.

PHA PLAN ELEMENT --- PART 6
Community Service and Self-Sufficiency

Community Service and Self-Sufficiency Program

[24 CFR Part 903.7 9 (l)]

A. PHA Coordination with the Welfare (TANF) Agency

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

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

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

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

- Public housing admissions and rent determination policies
- Section 8 admissions and rent determination policies

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

- Family Resource Centers in the two 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.

With the merger of the Section 8 Housing Choice Voucher Programs of the East St. Louis Housing Authority (ESLHA) and SCCHA effective October 1, 2013, with SCCHA serving as the administering entity, SCCHA also assumed administrative responsibilities for the Family Self-Sufficiency Program. SCCHA applied for and received a renewal grant for the Section 8 HCVP FSS program coordinator in 2014, 2015 and 2016. The

2015 and 2016 grants were for a part-time coordinator based upon number of participants under contract being less than the minimum of 25 (needed for a full time coordinator) as of the date specified by HUD. There are currently 41 participants enrolled in the FSS Program (participants under Contracts of Participation). SCCHA applied for and received a 2017 renewal grant with funding sufficient for a full-time Program Coordinator. SCCHA has taken advantage of the regulatory change that allows a single FSS program to serve both Section 8 HCVP participants and public housing residents. SCCHA applied for and received renewal grants in both 2018 and 2019.

PHA PLAN ELEMENT --- PART 7
Safety and Crime Prevention

PHA PLAN ELEMENT – PART 7

Safety and Crime Prevention Measures

[24 CFR Part 903.7 9 (m)]

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

1. Description of the need for measures to ensure the safety of public housing residents:

- High incidence of violent and/or drug-related crime in some or all of the SCCHA's developments
- High incidence of violent and/or drug-related crime in the areas surrounding or adjacent to the SCCHA's developments
- Residents fearful for their safety and/or the safety of their children
- Observed lower-level crime, vandalism and/or graffiti
- People on waiting list unwilling to move into one or more developments due to perceived and/or actual levels of violent and/or drug-related crime

2. Information or data SCCHA used to determine the need for actions to improve safety of residents:

- Safety and security survey of residents
- Analysis of crime statistics over time for crimes committed “in and around” public housing 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.

D. Submission of Emergency Security Grant Application

1. SCCHA applied for and received an Emergency Security Grant through HUD in 2010 that provided for the addition of surveillance cameras at the public housing properties in O'Fallon, Brooklyn and Belleville (IL030-027) and the upgrade and expansion of existing surveillance cameras at the Bel-Plaza 1 & 2 Buildings in Belleville. SCCHA applied for this grant again in 2014, targeting expansion of surveillance cameras at the Centreville public housing properties (Ernest Smith Sr. Apts. and Private Mathison Manor, exclusive of development #IL030-010). SCCHA's application was determined eligible for funding but was not selected in the random lottery. Thirteen housing authorities received security grant awards in 2014 out of more than 300 applicants. SCCHA also applied for the emergency security grant in 2015 and 2016, targeting the Private Mathison Manor development (the #IL030-010 portion of the property) because of the long-term physical viability study planned for the 30-08 portion of the Centreville properties. SCCHA applied for the ES grant in 2017 and 2018 targeting expansion of the video surveillance camera system at the Bel-Plaza 1 & 2 Senior Buildings in Belleville. The ES grant application in 2019 targeted the Amber Court property; a senior citizen designated development located in Belleville. SCCHA's grant applications in 2015, 2016, 2017, 2018 and 2019 were all determined eligible for funding, but were not one of the few PHAs randomly selected by lottery from among the hundreds that applied. SCCHA plans to continue to apply for this grant annually with the hope of being selected for funding.

PHA PLAN ELEMENT --- PART 8
Pet Policy (Public Housing Program)

PHA PLAN ELEMENT - PART 8
ST. CLAIR COUNTY HOUSING AUTHORITY'S
PET OWNERSHIP POLICY

Purpose

The purpose of this policy is to establish rules governing the ownership of common household pets in and on properties owned and operated by the St. Clair County Housing Authority. 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 considered as one pet. Rodents will be limited to 2 per cage. No breeding stock will be allowed.

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

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

All dogs and cats must be spayed or neutered.

Approval/Registration of Pets

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

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

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

Pet Fees/Security Deposits

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

Restrictions and Prohibitions

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

Conditions of Pet Ownership

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

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

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

Should the pet owner become unable to care for their pet for any reason, the name, address and phone number of 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 its quarters in a manner that will prevent odors and unsanitary conditions.

Pets must not 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.

DRAFT

PHA PLAN ELEMENT --- PART 9
Narrative Statement Regarding Fiscal Year Audit

FISCAL YEAR AUDIT (FYE 6/30/18)

The last final and complete Financial Audit is for the fiscal year ending June 30, 2019. The audit was accepted by HUD. The audit was performed by Rector, Reeder & Lofton, P.C. The audit report includes the following components:

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

The Auditor's Report indicates that no material weaknesses in internal control over financial reporting were identified, no noncompliance material to financial statements was noted, no material weaknesses in internal control over major programs were observed, and there were no findings disclosed that are required to be reported in accordance with Generally Accepted Government Auditing Standards (GACAS). The type of Auditor's Report issued on compliance for major programs was unmodified.

The full Audit Report for FYE-6/30/19 is on file at the SCCHA Central Office and is available for review upon request.

Prepared by:


Larry McLean, Executive Director

Date: January 21, 2020

PHA PLAN ELEMENT --- PART 10
Violence Against Women Act (VAWA) Statement and Policy Excerpts

VIOLENCE AGAINST WOMEN'S ACT POLICIES

Narrative Statement

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

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

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

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

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

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

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

Definitions

As used in VAWA:

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

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

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

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

Notification and Victim Documentation

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

The documentation must include two elements:

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

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

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

Perpetrator Removal or Documentation of Rehabilitation

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

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

Confidentiality Requirements

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

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

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

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

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

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

1. Victim Documentation

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

The documentation must include two elements:

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

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

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

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

2. Terminating the Lease of a Domestic Violence Perpetrator

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

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

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

3. PHA Confidentiality Requirements

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

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

St. Clair County Housing Authority's (SCCHA's)
Public Housing Program's Emergency Transfer Plan for Victims of Domestic Violence,
Dating Violence, Sexual Assault, or Stalking
Appendix S to the Admissions and Continued Occupancy Policy

Emergency Transfers

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

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

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

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

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

Eligibility for Emergency Transfers

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

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

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

Emergency Transfer Request Documentation

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

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

Confidentiality

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

Emergency Transfer Timing and Availability

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

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

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

Safety and Security of Tenants

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

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

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

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

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

Attachment: Local Assistance Organizations

- Violence Prevention Center of Southwest Illinois – 618-236-2531
- Call for Help – 618-397-3076

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

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

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

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

Definitions

As used in VAWA:

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

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

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

Notification and Victim Documentation

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

The documentation must include two elements:

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

One of the following:

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

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

Perpetrator Removal or Documentation of Rehabilitation

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

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

SCCHA Confidentiality Requirements

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

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

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

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

Victim Documentation

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

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

One or more of the following:

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

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

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

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

Terminating the Assistance of a Domestic Violence Perpetrator

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

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

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

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

SCCHA Confidentiality Requirements

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

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

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

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

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

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

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

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

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

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

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

Section 8 Housing Choice Voucher Program's (HCVP's) Emergency Transfer Plan for

Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking

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

Emergency Transfers / Moves

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

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

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

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

Eligibility for Emergency Transfers / Moves

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

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

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

Emergency Transfer / Move Request Documentation

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

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

Confidentiality

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

Emergency Transfer / Move Timing and Availability

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

Safety and Security of Participants

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

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

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

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

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

Attachment: Local Assistance Organizations

- Violence Prevention Center of Southwest Illinois – 618-236-2531
- Call for Help – 618-397-3076.

PHA PLAN ELEMENT --- PART 11
Smoke-Free Public Housing Policy

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

Purpose of No-Smoking Policy

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

Scope / Implementation / Effective Date

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

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

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

"Smoke Free" Areas

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

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

Those affected by the no-smoking policy

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

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

Board Approved 4/12/17

Proper Disposal of Cigarette Butts & Smoking Material

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

"Smoke Free" Signage

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

Lease Addendum

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

Cessation Education

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

Compliance / Enforcement

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

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

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

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

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