



ST. CLAIR COUNTY HOUSING AUTHORITY

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March 31, 2014

To: SCCHA Residents

This letter serves as a reminder notice that the **45 Day Comment Period** on the **St. Clair County Housing Authority 2014 Agency Plan Update (APU)** will end with the **Public Hearing to be held 5:00 p.m., Monday, April 7, 2014.** The APU includes the Five (5) Year Capital Improvements Plan for Public Housing properties, the Admissions and Continued Occupancy Plan (for the Public Housing Program), the Administrative Plan (for the Section 8 Housing Choice Voucher Program), along with other policies and procedures related to SCCHA's operation and administration of its programs (including the Utility Allowance Schedules).

Enclosed is information related to proposed changes to the Public Housing Admissions and Continued Occupancy Policy (ACOP) and the Section 8 Administrative Plan and proposed updates to the Utility Allowance Schedules (for Section 8 HCVP and Public Housing) and the Public Housing Flat Rent Schedule as part of the 2014 APU process.

Any interested resident is invited to review and comment upon the **2014 APU, including the proposed policy changes, utility allowance schedule updates, and Flat Rent Schedule.**

The public hearing will be held **at the SCCHA Central Office, 1790 South 74th Street, Belleville, IL. 62223.** You may contact the office at 618-277-3290 or visit the SCCHA website at www.sccha.org to obtain directions to the office or to request additional information.

A complete copy of the **2014 APU** is available for review at the following SCCHA site offices:

Private Mathison Manor, 610 South 66th St., Centreville
Ernest Smith Sr. Apartments, 4731 Tudor Ave., Centreville
Thomas Terry Apartments, 511 South 6th Street, Brooklyn
Scattered Site Management Office, 4601 North Belt West, Belleville

Residents of SCCHA properties and programs, along with our local government leadership, have a vital role in assisting the SCCHA in developing and implementing strategies related to the local administration of affordable housing programs for low-

"EQUAL HOUSING OPPORTUNITY"

EXECUTIVE DIRECTOR

Dave Wagner

ATTORNEYS

Philip Rice

Kevin Kaufhold

COMMISSIONERS

Eugene Verdu, Chairman

Daniel Barger

Billie Jean Miller

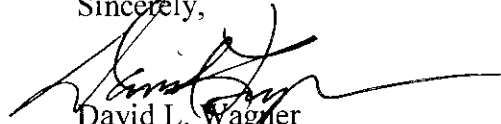
Vivian Cash

Phil Johnson

income households. The participation and involvement of residents, public officials and other interested parties is encouraged and appreciated.

If you are a person with a disability that requires an accommodation to participate in the **2014 APU** public review and comment process, please notify Larry McLean, Deputy Director, at 277-3290, through extension 6915 or 6958, or by other means available to you.

Sincerely,



David L. Wagner
Executive Director

Enc (1)

St. Clair County Housing Authority
Public Housing Utility Allowance Schedule
Effective Date: July 1, 2014

Development		Bedroom Size					
		0	1	2	3	4	5
30-1	Brooklyn		73	80	87	94	101
30-2	Marissa			82	89	97	
30-2C ¹	Marissa			152			
30-3	Dupo	59	59	67	74	81	
30-5	Smithton		74		88	94	
30-6 no Hi	Centreville		77	86	94	102	
30-6 Hi	Centreville Hi-Rise		31	34			
30-6 H-C 0/0 ²	Centreville Hi-Rise		62				
30-6 H-C 1/0 ³	Centreville Hi-Rise		68				
30-60	Centreville		78	86	95	102	
30-7	Marissa		76				
30-8	Centreville		76	84	92		107
30-80	Centreville			84	92		
30-9 – Gas Heat	Brooklyn		108	124	148		
30-9A – Elec. Heat ⁴	Brooklyn			139			
30-10	Centreville		76	83	94	101	
30-11	Alorton		67	77	90	100	
30-12	Brooklyn		78	86	96		
30-13	New Athens		137	164			
30-14	Lebanon		117	138	174		
30-16 (North 47 th)	Belleville Bel-Plaza 2		51				
30-61 (S. Church)	Belleville Bel-Plaza-1		51				
30-17	Washington Park		113	129			
30-17A S/F House ⁵	Washington Park			143			
30-18	Swansea		105				
30-19	Lenzburg		77	90			
30-20	Centreville		81				
30-21	New Athens		147				
30-22	Millstadt		154	187	248		
30-24A ⁶	O'Fallon			66			
30-24B	O'Fallon			152			
30-27	Belleville – Amber Ct.		58	67			
30-28	Lenzburg			85	94		

Proposed Effective Date: July 1, 2014

Resident Comment Period: February 17th through April 17, 2014

Anticipated Board Approval Date: May 14, 2014

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

² Units = 202, 302, 402, 502

³ Units = 206, 306, 406, 506

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

⁵ Units = 1800, 1826, 2236 and 2240

⁶ Buildings = 301 and 303 Estate

NOTIFICATION OF OPPORTUNITY TO APPLY FOR INDIVIDUAL RELIEF

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

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

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

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

3/14/2014

**St. Clair County Housing Authority
Public Housing**

Proposed Flat Rent Schedule - 2014

	Efficiency	Bedroom Size					Comments
		1-Br	2-Br	3-Br	4-Br	5-Br	
Alorton - (Hawthorne - 011)		\$438	\$574	\$759	\$862		
Belleville (Amber Court - 027)		\$447	\$584				
Belleville (Bel-Plaza 1 - Church - 061)		\$454					
Belleville (Bel-Plaza 2 - N. 47th - 016)		\$454					
Brooklyn - Thomas Terry - 001		\$432	\$571	\$762	\$868	\$1,006	
Brooklyn - TT - 009 (Gas Heat)		\$397	\$527	\$701			
Brooklyn - TT - 009 (Elec Heat)			\$512				
Brooklyn - TT - 012		\$427	\$565	\$753			
Centreville - ESS - AJB Hi-Rise		\$474	\$617				
Centreville - ESS - AJB HRC 0/0		\$443					
Centreville - ESS - AJB HRC 0/1		\$437					
Centreville - ESS (006)		\$428	\$565	\$755	\$860		
Centreville - ESS (008)		\$429	\$567	\$757		1000	
Centreville - ESS (020)		\$424					
Centreville - PMM (010)		\$429	\$527	\$755	\$861		
Centreville - PMM (060)		\$427	\$565	\$754	\$860		
Centreville - PMM (080)			\$567	\$757			
Dupo	\$367	\$446	\$584	\$775	\$881		
Lebanon (Garden Ridge - 014)		\$388	\$513	\$675			
Lenzburg (019)		\$428	\$561				
Lenzburg (028)			\$566	\$755			
Marissa (002)			\$569	\$760	\$865		
Marissa (002 - C)			\$499				
Marissa (007)			\$429				
Millstadt		\$351	\$464	\$601			
New Athens (Phillips - 013)		\$368	\$487				
New Athens (South Clinton - 021)		\$358					
O'Fallon (024-A)			\$585				(garden / flats)
O'Fallon (024-B)			\$499				(TH tenant pays wtr/swr)
Smithton (005)		\$431		\$761	\$868		
Swansea (Fullerton Rd - 018)		\$400					
Washington Park - 017 Scattered		\$392	\$522				(2-BR - four-plex)
Washington Park - 017 Scattered			\$508				(2-BR - SF home)
Anticipated Board Approval - 4/9/14							
Anticipated Effective Date - 7/1/14 or later depending upon date HUD issues final guidance							

Proposed Changes to the Public Housing Admissions and Continued Occupancy Policy (ACOP)

- Add the following as item “R” under Section 8 “Eligibility for Admission”, sub-part 8.4 “Grounds for Denial:”

“Providing different and/or inconsistent information related to household income, family composition, place of residence, and/or any other material or significant information needed to accurately determine benefit / assistance levels to SCCHA and other local, State and/or federal assistance providers.”

- Add the following as item “S” under Section 8 “Eligibility for Admission”, sub-part 8.4 “Grounds for Denial:”

“Applicant or applicant household member has an outstanding arrest warrant. *Note: For misdemeanor and traffic related warrants, SCCHA shall provide the applicant with up to sixty (60) days to clear the warrant before denying the application.*”

- Add the following as item “T” under Section 8 “Eligibility for Admission”, sub-part 8.4 “Grounds for Denial:”

“Applicant or adult applicant household member with an open criminal case (non-traffic) that is not of a nature that would otherwise result in denial but is not adjudicated within sixty (60) days during the period the applicant is being actively screened for potential unit assignment shall be denied admission at that time, but shall be returned to the active wait list with a new date / time.”

- Replace the definition in Section 10.0 “Resident Selection and Assignment Plan”, sub-part 10.1, “Preferences,” item d) “Unmet Housing Need” to read as follows:

“This preference is available to applicants who have an unmet housing need. 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 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.”

- Revise item “B” under Section 11.2 “Annual Income Exclusions” to read as follows:

“Foster care payments for the care of foster children or adults (usually persons with disabilities, unrelated to the resident family, who are unable to live alone). *Note: Other income of foster children or adults is included as household income, specifically including, but not necessarily limited to social security disability / supplemental social security benefits.*”

- Add the following language in Section 15.0 “Recertifications,” sub-part 15.6 “Interim Reexaminations,” paragraph B): “

“Definition and Policy for Approving Live-in Aides

Live-in aide means a person who resides with one or more elderly persons, or near-elderly persons, or persons with disabilities, and who: (1) is determined to be essential to the care and well-being of the persons, (2) is not obligated for the support of the persons, and (3) would not be living in the unit except to provide the necessary supportive services [24 CFR 5.403]. The SCCHA must approve a live-in aide if needed as a reasonable accommodation in accordance with 24 CFR 8, to make the program accessible to and usable by the family member with disabilities. A live-in aide is a member of the household, not the family, and the income of the aide is not considered in income calculations [24 CFR 5.609(b)]. Relatives may be approved as live-in aides if they meet all of the criteria defining a live-in aide. However, a relative who serves as a live-in aide is not considered a family member and would not be considered a remaining member of a tenant family.

SCCHA Policy

A family’s request for a live-in aide must be made in writing. Written verification will be required from a reliable, knowledgeable professional, such as a doctor, social worker, or case worker, that the live-in aide is essential for the care and well-being of the elderly, near-elderly, or disabled family member. For continued approval, the family must submit a new, written request (subject to SCCHA verification) at each annual reexamination. In addition, the family and live-in aide will be required to submit a certification stating that the live-in aide is (1) not obligated for the support of the person(s) needing the care, and (2) would not be living in the unit except to provide the necessary supportive services.

The SCCHA will not approve a particular person as a live-in aide, and may withdraw such approval if [24 CFR 982.316(b)]: a) The person commits or has committed fraud, bribery or any other corrupt or criminal act in connection with any federal housing program; b) The person commits or has committed drug-related criminal activity, violent criminal activity, or other serious and or repeated criminal activity, or; c) The person currently owes rent or other amounts to the SCCHA or to another PHA in connection with Section 8 or public housing assistance under the 1937 Act. Within 10 business days of receiving a request for a live-in aide, including all required documentation related to the request, the SCCHA will notify the family of its decision in writing.”

- Change the language in existing item “M” under Section 20 “Terminations”, sub-section 20.2 “Termination by the Housing Authority” of the Admissions and Continued Occupancy Policy to item “N”
- Add the following as item “M” under Section 20 “Terminations”, sub-section 20.2 “Termination by the Housing Authority” of the Admissions and Continued Occupancy Policy:

“Providing different and/or inconsistent information related to household income, family composition, place of residence, and/or any other material or significant information needed to accurately determine benefit / assistance levels to SCCHA and other local, State and/or federal assistance providers.”

Proposed Change in Public Housing Service Charge Policy

- Add as item #14 under “Specified Charges” the following:
“Tenant requested lock change - \$50 (per core)”

Proposed Changes in the Public Housing Lease Agreement

- Revise item P) under Part 9 “Resident Obligations” to read as follows:
“Refrain from and cause household members, guests, or other persons who are on the premises as a result of his occupancy to refrain from any and all illegal activity and/or other activity; specifically including, but not limited to, drug related (i.e. illegal manufacture, sale, distribution, use or possession with intent to manufacture, sell, distribute, or use of a controlled substance) and violent criminal activity on or near public housing property which impairs the physical or social environment of the development.”
- Add the following as item “DO” under part 9 “Resident’s Obligations”
“Provide consistent information related to household income, family composition, place of residence, and/or any other material or significant information needed to accurately determine benefit / assistance levels to SCCHA and other local, State and/or federal assistance providers.”
- Add the following as item “EE” under part 9 “Resident Obligations”
“Refrain from and cause household members to refrain from any felony criminal conduct or establishing a pattern of misdemeanor criminal conduct on or off the premises.”

Proposed Changes in the Section 8 Housing Choice Voucher Program Administrative Plan

- Revise the narrative under “SCCHA Policy” under Section 1 “The SCCHA”, sub-part 1-I.D “The SCCHA’s Program” (page 1-3) to read as follows:
“The SCCHA’s Administrative Plan is applicable to the operation of the Section 8 Housing Choice Voucher Program, including project-based vouchers and the four special-purpose programs that SCCHA inherited when the HCVPs of the Housing Authority of the City of East St. Louis and SCCHA were merged (10/1/2013) ---Family Unification Program (FUP), Tenant Protection (TP), Home Ownership (HO) and Family Self-Sufficiency (FSS). All of these programs shall be administered in accordance with this Administrative Plan (AP), federal statute, and HUO regulations. In the event of conflict, federal statute and HUO regulation shall prevail. Administration of the FUP is further governed by the Memorandum of Understanding executed between SCCHA and the Illinois Department of Children and Family Services (IOCFS). Administration of the FSS Program is additionally governed by the FSS Program Action Plan.”

- Revise the last sentence of the third paragraph under Section 3-I.K “Foster Children and Foster Adults” (page 3-6) to read as follows.

“Foster care payments received by the head of the household (or other adult member) are not counted in family annual income, and foster children / adults do not qualify for a dependent deduction [24 CFR 5.603; HUD-50058 IB, p. 13]. Other income of a foster child / adult, specifically including but not necessarily limited to SSD and/or SSI benefits, is counted in family income.

- Add the following language under the “SCCHA Policy” narrative related to *denial of assistance* on page 3-19:

“The family provides different and/or inconsistent information related to household income, family composition, place of residence, and/or any other material or significant information needed to accurately determine benefit / assistance levels to SCCHA and other local, State and/or federal entities.”

- Revise the definition of “Unmet Housing Need” in Section 4 “Applications, Waiting List, and Tenant Selection, sub-part 4-III.C “ Selection Method” to read as follows:

“This preference is available to applicants who have an unmet housing need. 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.”

- Revise the “SCCHA Policy” statement under Section 8, “Housing Quality Standards and Rent Reasonableness Determinations”, Part II “The Inspection Process,” sub-part 8-II.B “Initial HQS Inspection”, the paragraph heading “Appliances” (page 8-10), to read as follows:

“If the family is responsible for supplying the stove and/or refrigerator, the SCCHA will allow the appliance(s) to be placed in the unit after the unit has met all other HQS and program requirements. The HAP contract shall be prepared and mailed to the Owner for signature once the unit has met all other HQS requirements (and all other program requirements, such as but not limited Rent Reasonableness), along with a “Certification Regarding Family Supplied Appliances” to be signed by the Owner and Tenant and returned to SCCHA (with the HAP Contract and executed lease). The “Certification” shall state that the family supplied appliances have been placed in the unit and are operational. As long as the appliance(s) are placed in service and are operational within fourteen days of the date the unit otherwise passed inspection, the effective date of the HAP contract shall remain unchanged. If the family supplied appliances are not placed in service within fourteen days of the unit otherwise passing inspection, the effective date of the HAP contract shall be revised to the date the appliances are

actually placed in service and are operational. The family shall be responsible for the full rent due the owner for the period the unit is not eligible for HAP subsidy because the family supplied appliances were not in service. SCCHA shall inspect the unit to confirm the appliances are in place and operational prior to the release of the initial HAP payment.”

- Add the following paragraph heading and “SCCHA Policy” statement under Section 8, “Housing Quality Standards and Rent Reasonableness Determinations”, Part II “The Inspection Process,” at the end of sub-part 8-II.F “Inspection Results and Reinspections for Units Under HAP Contract” (page 8-13):

“Owner / Tenant Self-Certifications

With each notification letter mailed to the Owner and Tenant listing the HQS violations / deficiencies noted during the annual or other inspection / re-inspection of the unit a ‘Housing Quality Standards (HQS) Repair Self-Certification’ form shall be included. Upon completion of the necessary repairs, the owner and tenant are to sign and return the certification to SCCHA. If the signed self-certification is not received by SCCHA within the time frame specified in the notification letter, the matter shall be handled in accordance with the provisions of the paragraphs headed as ‘Extensions’ and/or ‘HAP Abatement.’ Upon receipt of the self-certification form, the SCCHA Inspection Manager shall determine whether the conditions warrant a follow-up inspection of the unit. Any and all major / significant repairs shall trigger a follow-up inspection. The self-certification may be, but will not always be, accepted as verification of completion of the repairs depending upon the severity of the corrections need and/or SCCHA’s experience with the owner and property. The date the unit “passed” inspection shall be either the date the self-certification was received and accepted by SCCHA as verification of completion of the repairs or the date of the actual follow-up inspection.

As it does for all initial inspection, in the case of project-based vouchers, the SCCHA shall always conduct a follow-up inspection to determine if the HQS deficiency is corrected pursuant to 24 CFR 983.103(e)(2).”

- Add the following language under “SCCHA Policy” narrative related to **termination of assistance** on page 12-5:

“The family provides different and/or inconsistent information related to household income, family composition, place of residence, and/or any other material or significant information needed to accurately determine benefit / assistance levels to SCCHA and other local, State and/or federal entities.”

- Add the following language to Exhibit 12-1: “Statement of Family Obligations” under the fourth bulleted statement “Any information supplied by the family must be true and complete”

“SCCHA Policy

It shall be considered a violation of Family Obligations if the family provides different and/or inconsistent information related to household income, family composition, place of residence, and/or any other material or significant information needed to accurately determine benefit /

assistance levels to SCCHA and other local, State and/or federal assistance providers.”

Policy Changes Resulting From 2014 Omnibus Appropriations Act

The omnibus contains a number of changes which HUD and industry organizations proposed and supported. These changes are intended to save costs and reduce administrative burden in sensible ways and streamline rental programs. The changes outlined below cannot be implemented by SCCHA until such time as notified by HUD. Further guidance and rule making is necessary. However, SCCHA is planning for these changes and including them in its 2014 Agency Plan Update. Once HUD issues implementation guidance, the changes will be incorporated into SCCHA's Public Housing Admissions and Continued Occupancy Policy and the Section 8 Administrative Plan without further public notice. The policy changes are summarized as follows.

Public Housing Flat Rent Floor: The law requires that all public housing authorities (PHAs) set their Flat Rents no lower than 80 percent of the applicable fair market rent (FMR) in their area. In cases where following this formula causes flat rents to exceed 135 percent of existing flat rent, the amount must be phased in to ensure that families do not experience a rent increase of more than 35 percent annually. The law requires PHAs to implement the change by June 1, 2014. HUD will issue guidance on how to implement these changes in the near future.

Change in Definition of Extremely Low-Income (ELI) Families: An ELI family has traditionally been defined as a family whose annual income does not exceed 30 percent of the median income for the area (AMI), as determined by HUD, with adjustments for smaller and larger families. The omnibus changes the definition of ELI to the highest of up to 30 percent of HUD's published adjusted area median income (AMI) or the federal poverty line. Both the Public Housing and Section 8 HCVP have income targeting requirements. The change is likely not significant for the public housing program since regulations require that 40 percent of annual admissions be ELI families. However, the Section 8 HCVP income targeting requires that 75 percent of new admissions each fiscal year be ELI families.

Application of Utility Allowances in the Section 8 HCVP: The omnibus limits the utility allowance used to the unit size covered by the individual family's voucher.

HCVP Housing Quality Standards (HQS) Inspections: Under current regulations PHAs are required to inspect units at the time of initial lease-up and thereafter at least once every twelve months. The omnibus changes the requirement so that an HWS inspection must occur at least once every two years. Further, PHAs will have the ability to rely on comparable inspections performed by other agencies, like those for the HOME or low-income housing tax credit (LIHTC) programs, if the other inspection uses similar standards to HQS. **Note: SCCHA believes it is important to inspect assisted units at least annually and anticipates utilizing the option of two year inspections on a very limited basis.**

Family Self-Sufficiency (FSS) Single Account: The omnibus bill creates a single new account for FSS which gives HUD waiver authority to allow PHAs to administer a single FSS program for both HCV and public housing.