

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

PHA Plans

5 Year Plan for Fiscal Years 2005 - 2009
Annual Plan for Fiscal Year 2005

**NOTE: THIS PHA PLANS TEMPLATE (HUD 50075) IS TO BE COMPLETED IN
ACCORDANCE WITH INSTRUCTIONS LOCATED IN APPLICABLE PIH NOTICES**

**PHA Plan
Agency Identification**

PHA Name: St. Clair County Housing Authority

PHA Number: IL030

PHA Fiscal Year Beginning: (mm/yyyy) 07/2005

Public Access to Information

Information regarding any activities outlined in this plan can be obtained by contacting: (select all that apply)

- Main administrative office of the PHA
- PHA development management offices
- PHA local offices

Display Locations For PHA Plans and Supporting Documents

The PHA Plans (including attachments) are available for public inspection at: (select all that apply)

- Main administrative office of the PHA
- PHA development management offices
- PHA local offices
- Main administrative office of the local government
- Main administrative office of the County government
- Main administrative office of the State government
- Public library
- PHA website
- Other (list below)

PHA Plan Supporting Documents are available for inspection at: (select all that apply)

- Main business office of the PHA
- PHA development management offices
- Other (list below)

5-YEAR PLAN
PHA FISCAL YEARS 2005 - 2009
[24 CFR Part 903.5]

A. 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. (select one of the choices below)

- The mission of the PHA is the same as that of the Department of Housing and Urban Development: To promote adequate and affordable housing, economic opportunity and a suitable living environment free from discrimination.
- The PHA's mission is: It is the mission of the St. Clair County Housing Authority (SCCHA) to provide well-maintained and safe assisted housing to the eligible low-income residents of St. Clair County. SCCHA is committed to assisting residents in meeting their personal development goals, especially those related to achieving economic self-sufficiency and those related to senior citizens maintaining an independent lifestyle. SCCHA is committed to providing its services in an efficient, economical, and legally responsible manner.

B. Goals

The goals and objectives listed below are derived from HUD's strategic Goals and Objectives and those emphasized in recent legislation. PHAs may select any of these goals and objectives as their own, or identify other goals and/or objectives. Whether selecting the HUD-suggested objectives or their own, **PHAS ARE STRONGLY ENCOURAGED TO IDENTIFY QUANTIFIABLE MEASURES OF SUCCESS IN REACHING THEIR OBJECTIVES OVER THE COURSE OF THE 5 YEARS.** (Quantifiable measures would include targets such as: numbers of families served or PHAS scores achieved.) PHAs should identify these measures in the spaces to the right of or below the stated objectives.

HUD Strategic Goal: Increase the availability of decent, safe, and affordable housing.

- PHA Goal: Expand the supply of assisted housing
Objectives:
- Apply for additional rental vouchers:
 - Reduce public housing vacancies:
 - Leverage private or other public funds to create additional housing opportunities:
 - Acquire or build units or developments
 - Other (list below)
- PHA Goal: Improve the quality of assisted housing
Objectives:
- Improve public housing management: (PHAS score)
 - Improve voucher management: (SEMAP score)
 - Increase customer satisfaction:

- Concentrate on efforts to improve specific management functions:
(list; e.g., public housing finance; voucher unit inspections)
- Renovate or modernize public housing units:
- Demolish or dispose of obsolete public housing:
- Provide replacement public housing:
- Provide replacement vouchers:
- Other: (list below)

Develop Asset Management system for property assessment

PHA Goal: Increase assisted housing choices

Objectives:

- Provide voucher mobility counseling:
- Conduct outreach efforts to potential voucher landlords
- Increase voucher payment standards
- Implement voucher homeownership program:
- Implement public housing or other homeownership programs:
- Implement public housing site-based waiting lists:
- Convert public housing to vouchers:
- Other: (list below)

-Pursue renewal of project-based Section 8 HAP Contract for Townhouse Court, 8 unit development in Brooklyn that expires 8/13/05.

-Develop local homebuyer assistance program

HUD Strategic Goal: Improve community quality of life and economic vitality

PHA Goal: Provide an improved living environment

Objectives:

- Implement measures to deconcentrate poverty by bringing higher income public housing households into lower income developments:
- Implement measures to promote income mixing in public housing by assuring access for lower income families into higher income developments:
- Implement public housing security improvements:
- Designate developments or buildings for particular resident groups (elderly, persons with disabilities)
- Other: (list below)

-Continue aggressive applicant screening and resident lease enforcement efforts.

HUD Strategic Goal: Promote self-sufficiency and asset development of families and individuals

PHA Goal: Promote self-sufficiency and asset development of assisted households

Objectives:

- Increase the number and percentage of employed persons in assisted families:
- Provide or attract supportive services to improve assistance recipients' employability:
- Provide or attract supportive services to increase independence for the elderly or families with disabilities.
- Other: (list below)

-Encourage/promote resident participation in education/training programs by fostering partnerships with providers.

-Administer Family Self-Sufficiency Program serving 25 clients.

HUD Strategic Goal: Ensure Equal Opportunity in Housing for all Americans

PHA Goal: Ensure equal opportunity and affirmatively further fair housing

Objectives:

- Undertake affirmative measures to ensure access to assisted housing regardless of race, color, religion national origin, sex, familial status, and disability:
- Undertake affirmative measures to provide a suitable living environment for families living in assisted housing, regardless of race, color, religion national origin, sex, familial status, and disability:
- Undertake affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required:
- Other: (list below)

Other PHA Goals and Objectives: (list below)

- Encourage and participate to extent feasible the removal and redevelopment of blighted area in West Belleville (Arlington Drive off South 74th Street).
- Partner with local Urban League Office involved with mortgage counseling and homebuyer preparedness activities to implement homeownership opportunities for eligible Section 8 Housing Choice Voucher participants.
- Improve school attendance by youth residing in assisted households by adopting resolutions that requires compliance with local truancy ordinances as condition of eligibility for all housing assistance programs administered by SCCHA

Annual PHA Plan
PHA Fiscal Year 2005
[24 CFR Part 903.7]

i. Annual Plan Type:

Select which type of Annual Plan the PHA will submit.

Standard Plan

Streamlined Plan:

- High Performing PHA**
 Small Agency (<250 Public Housing Units)
 Administering Section 8 Only

Troubled Agency Plan

ii. Executive Summary of the Annual PHA Plan

[24 CFR Part 903.7 9 (r)]

Provide a brief overview of the information in the Annual Plan, including highlights of major initiatives and discretionary policies the PHA has included in the Annual Plan.

SCCHA has prepared its Agency Plan in compliance with Section 511 of the Quality Housing and Work Responsibility Act of 1998 and the ensuing HUD requirements.

Although capital-improvement needs are great, all of SCCHA's public housing stock is viable. Therefore, no demolition or conversion activity is planned.

There are no plans to expand the Public Housing or Section 8 Tenant-Based Assistance Programs due to a variety of local factors.

SCCHA's efforts are focused on improving the management of the public housing and administration of the Section 8 program (obtain "high performer" status under PHAS and SEMAP).

Annual Plan highlights and SCCHA discretionary policies include:

- Develop Asset Management System to assess each public housing development
- Utilize Capital Grants Program to upgrade / modernize the public housing stock
- Through partnerships with local law enforcement and prevention program services providers (and contracting for supplemental direct services when funding is available) reduce the level of drug-related crime in the targeted developments to a level equal to or less than the surrounding neighborhoods
- Develop local homebuyer assistance program serving public housing residents and Section 8 participants
- Pursue renewal of project-based Section 8 Housing Assistance Payments Contracts that expire within next 5 years
- Apply for designation of targeted properties as "seniors only" and "non-elderly disabled".

iii. Annual Plan Table of Contents

[24 CFR Part 903.7 9 (r)]

Provide a table of contents for the Annual Plan, including attachments, and a list of supporting documents available for public inspection.

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Annual Plan

- i. Executive Summary
- ii. Table of Contents
 1. Housing Needs
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 6. Grievance Procedures
 7. Capital Improvement Needs
 8. Demolition and Disposition
 9. Designation of Housing
 10. Conversions of Public Housing
 11. Homeownership
 12. Community Service Programs
 13. Crime and Safety
 14. Pets (Inactive for January 1 PHAs)
 15. Civil Rights Certifications (included with PHA Plan Certifications)
 16. Audit
 17. Asset Management
 18. Other Information

Attachments

Indicate which attachments are provided by selecting all that apply. Provide the attachment's name (A, B, etc.) in the space to the left of the name of the attachment. Note: If the attachment is provided as a **SEPARATE** file submission from the PHA Plans file, provide the file name in parentheses in the space to the right of the title.

Required Attachments:

- Admissions Policy for Deconcentration (combined with ACOP)
- FY 2005 Capital Fund Program Annual Statement
- Most recent board-approved operating budget (Required Attachment for PHAs that are troubled or at risk of being designated troubled ONLY)

Optional Attachments:

- PHA Management Organizational Chart
- FY 2005 Capital Fund Program 5 Year Action Plan
- Public Housing Drug Elimination Program (PHDEP) Plan
- Comments of Resident Advisory Board or Boards (must be attached if not included in PHA Plan text)
- Other (List below, providing each attachment name)

- IL30a01 - Admission and Continued Occupancy Policy
- IL30b01 - Annual Statement Capital Fund Program – Part 1 – 502-03
Annual Statement Capital Fund Program – Part 2 – 502-03
Annual Statement Capital Fund Program – Part 3 – 502-03
- IL30c01 - Five Year Action Plan – Part 1
Five Year Action Plan – Part 2
- IL30d01 - Resident Advisory Board Membership Roster
- IL30e01 - Conversion Analysis
- IL30f01 - Public Housing Asset Management Table
- IL30g01 - Response to Resident Comments Received (Public Hearing Minutes)
- IL30h01 - Community Service Policy
- IL30i01 - Deconcentration Policy
- IL30j01 - Resident Advisory Board Meeting Minutes
- IL30k01 - Site Based Waiting List Breakdown/Narrative
- IL30l01 - Designation Narrative
- IL30m01 - Section 8 Homeownership Capacity Statement
- IL30n01 - Pet Policy

Supporting Documents Available for Review

Indicate which documents are available for public review by placing a mark in the “Applicable & On Display” column in the appropriate rows. All listed documents must be on display if applicable to the program activities conducted by the PHA.

List of Supporting Documents Available for Review		
Applicable & On Display	Supporting Document	Applicable Plan Component
X	PHA Plan Certifications of Compliance with the PHA Plans and Related Regulations	5 Year and Annual Plans
X	State/Local Government Certification of Consistency with the Consolidated Plan	5 Year and Annual Plans
	Fair Housing Documentation: Records reflecting that the PHA has examined its programs or proposed programs, identified any impediments to fair housing choice in those programs, addressed or is addressing those impediments in a reasonable fashion in view of the resources available, and worked or is working with local jurisdictions to implement any of the jurisdictions’ initiatives to affirmatively further fair housing that require the PHA’s involvement.	5 Year and Annual Plans
X	Consolidated Plan for the jurisdiction/s in which the PHA is located (which includes the Analysis of Impediments to Fair Housing Choice (AI)) and any additional backup data to support statement of housing needs in the jurisdiction	Annual Plan: Housing Needs
X	Most recent board-approved operating budget for the public housing program	Annual Plan: Financial Resources;

List of Supporting Documents Available for Review		
Applicable & On Display	Supporting Document	Applicable Plan Component
X	Public Housing Admissions and (Continued) Occupancy Policy (A&O), which includes the Tenant Selection and Assignment Plan [TSAP]	Annual Plan: Eligibility, Selection, and Admissions Policies
X	Section 8 Administrative Plan	Annual Plan: Eligibility, Selection, and Admissions Policies
X	Public Housing Deconcentration and Income Mixing Documentation: 1. PHA board certifications of compliance with deconcentration requirements (section 16(a) of the US Housing Act of 1937, as implemented in the 2/18/99 <i>Quality Housing and Work Responsibility Act Initial Guidance; Notice</i> and any further HUD guidance) and 2. Documentation of the required deconcentration and income mixing analysis	Annual Plan: Eligibility, Selection, and Admissions Policies
X	Public housing rent determination policies, including the methodology for setting public housing flat rents <input checked="" type="checkbox"/> check here if included in the public housing A & O Policy	Annual Plan: Rent Determination
X	Schedule of flat rents offered at each public housing development <input checked="" type="checkbox"/> check here if included in the public housing A & O Policy	Annual Plan: Rent Determination
X	Section 8 rent determination (payment standard) policies <input checked="" type="checkbox"/> check here if included in Section 8 Administrative Plan	Annual Plan: Rent Determination
X	Public housing management and maintenance policy documents, including policies for the prevention or eradication of pest infestation (including cockroach infestation)	Annual Plan: Operations and Maintenance
X	Public housing grievance procedures <input checked="" type="checkbox"/> check here if included in the public housing A & O Policy	Annual Plan: Grievance Procedures
X	Section 8 informal review and hearing procedures <input checked="" type="checkbox"/> check here if included in Section 8 Administrative Plan	Annual Plan: Grievance Procedures
X	The HUD-approved Capital Fund/Comprehensive Grant Program Annual Statement (HUD 52837) for the active grant year	Annual Plan: Capital Needs
	Most recent CIAP Budget/Progress Report (HUD 52825) for any active CIAP grant	Annual Plan: Capital Needs
	Most recent, approved 5 Year Action Plan for the Capital Fund/Comprehensive Grant Program, if not included as an attachment (provided at PHA option)	Annual Plan: Capital Needs
	Approved HOPE VI applications or, if more recent, approved or submitted HOPE VI Revitalization Plans or any	Annual Plan: Capital Needs

List of Supporting Documents Available for Review		
Applicable & On Display	Supporting Document	Applicable Plan Component
	other approved proposal for development of public housing	
	Approved or submitted applications for demolition and/or disposition of public housing	Annual Plan: Demolition and Disposition
X	Approved or submitted applications for designation of public housing (Designated Housing Plans)	Annual Plan: Designation of Public Housing
	Approved or submitted assessments of reasonable revitalization of public housing and approved or submitted conversion plans prepared pursuant to section 202 of the 1996 HUD Appropriations Act	Annual Plan: Conversion of Public Housing
	Approved or submitted public housing homeownership programs/plans	Annual Plan: Homeownership
	Policies governing any Section 8 Homeownership program <input type="checkbox"/> check here if included in the Section 8 Administrative Plan	Annual Plan: Homeownership
X	Any cooperative agreement between the PHA and the TANF agency	Annual Plan: Community Service & Self-Sufficiency
X	FSS Action Plan/s for public housing and/or Section 8	Annual Plan: Community Service & Self-Sufficiency
X	Most recent self-sufficiency (ED/SS, TOP or ROSS or other resident services grant) grant program reports	Annual Plan: Community Service & Self-Sufficiency
	The most recent Public Housing Drug Elimination Program (PHEDEP) semi-annual performance report for any open grant and most recently submitted PHDEP application (PHDEP Plan)	Annual Plan: Safety and Crime Prevention
X	The most recent fiscal year audit of the PHA conducted under section 5(h)(2) of the U.S. Housing Act of 1937 (42 U.S.C. 1437c(h)), the results of that audit and the PHA's response to any findings	Annual Plan: Annual Audit
	Troubled PHAs: MOA/Recovery Plan	Troubled PHAs
	Other supporting documents (optional) (list individually; use as many lines as necessary)	(specify as needed)

1. Statement of Housing Needs

[24 CFR Part 903.7 9 (a)]

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

Based upon the information contained in the Consolidated Plan/s applicable to the jurisdiction, and/or other data available to the PHA, provide a statement of the housing needs in the jurisdiction by completing the following table. In the "Overall" Needs column, provide the estimated number of renter families that have housing needs. For the remaining characteristics, rate the impact of that factor on the housing needs for each family type, from 1 to 5, with 1 being "no impact" and 5 being "severe impact." Use N/A to indicate that no information is available upon which the PHA can make this assessment.

Housing Needs of Families in the Jurisdiction by Family Type

Family Type	Overall	Afford-ability	Supply	Quality	Access-ibility	Size	Loca-tion
Income <= 30% of AMI	8,468	5	5	5	5	5	5
Income >30% but <=50% of AMI	4,791	4	4	4	4	4	4
Income >50% but <80% of AMI	6,751	3	3	3	3	3	3
Elderly	5,345	3	3	3	3	3	3
Families with Disabilities	2,001	5	5	5	5	5	5
Race/Ethnicity White	15,880	3	3	3	3	3	3
Race/Ethnicity Black	2,649	4	4	4	4	4	4
Race/Ethnicity Other	1,481	3	3	3	3	3	3

What sources of information did the PHA use to conduct this analysis? (Check all that apply; all materials must be made available for public inspection.)

- Consolidated Plan of the Jurisdiction/s
Indicate year:
- U.S. Census data: the Comprehensive Housing Affordability Strategy (“CHAS”) dataset
- American Housing Survey data
Indicate year:
- Other housing market study
Indicate year: National Low Income Housing Coalition “Out of Reach”
September 2000
- Other sources: (list and indicate year of information)

Estimate for “Families with Disabilities” based upon information from the “Living Independently Now Center” (LINC) indicating that approximately 10% of the population suffers from a disability that impacts housing choices.

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

State the housing needs of the families on the PHA’s waiting list/s. **Complete one table for each type of PHA-wide waiting list administered by the PHA.** PHAs may provide separate tables for site based or sub-jurisdictional public housing waiting lists at their option.

Housing Needs of Families on the Waiting List
--

Housing Needs of Families on the Waiting List			
Waiting list type: (select one)			
<input checked="" type="checkbox"/>	Section 8 tenant-based assistance		
<input type="checkbox"/>	Public Housing		
<input type="checkbox"/>	Combined Section 8 and Public Housing		
<input type="checkbox"/>	Public Housing Site-Based or sub-jurisdictional waiting list (optional)		
If used, identify which development/subjurisdiction:			
	# of families	% of total families	Annual Turnover
Waiting list total	5211	100%	
Extremely low income <=30% AMI	3335	68%	
Very low income (>30% but <=50% AMI)	699	14%	
Low income (>50% but <80% AMI)	658	14%	
Families with children	4163	80%	
Elderly families	205	4%	
Families with Disabilities	359	15%	
Race/ethnicity-White	1030	20%	
Race/ethnicity-Black	4055	76%	
Race/ethnicity-Native American	8	<1%	
Race/ethnicity-Asian	6	<1%	
Hispanic	112	2%	
Characteristics by Bedroom Size (Public Housing Only)			
1BR	1820	30%	
2 BR	2326	39%	
3 BR	1492	25%	
4 BR	300	5%	
5 BR	44	1%	
5+ BR	1	<1%	

Housing Needs of Families on the Waiting List	
Is the waiting list closed (select one)? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	
If yes:	
How long has it been closed (# of months)?	
Does the PHA expect to reopen the list in the PHA Plan year? <input type="checkbox"/> No <input type="checkbox"/> Yes	
Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input type="checkbox"/> No <input type="checkbox"/> Yes	

Housing Needs of Families on the Waiting List			
Waiting list type: (select one)			
<input type="checkbox"/> Section 8 tenant-based assistance			
<input checked="" type="checkbox"/> Public Housing (Combination of 18 different site based waiting lists)			
<input type="checkbox"/> Combined Section 8 and Public Housing			
<input type="checkbox"/> Public Housing Site-Based or sub-jurisdictional waiting list (optional)			
If used, identify which development/subjurisdiction:			
	# of families	% of total families	Annual Turnover
Waiting list total	2046		
Extremely low income <=30% AMI	1410	69%	
Very low income (>30% but <=50% AMI)	370	18%	
Low income (>50% but <80% AMI)	266	13%	
Families with children	1286	63%	
Elderly families	79	4%	
Families with Disabilities	124	6%	
Race/ethnicity- White	348	12%	
Race/ethnicity- Black	1,677	82%	
Race/ethnicity- Native American	1	<1%	
Race/ethnicity- Hispanic	13	1%	
Characteristics by Bedroom Size			

Housing Needs of Families on the Waiting List			
(Public Housing Only)			
1BR	760	37%	
2 BR	805	39%	
3 BR	389	19%	
4 BR	81	4%	
5 BR	11	1%	
5+ BR			
Is the waiting list closed (select one)? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes			
If yes:			
How long has it been closed (# of months)?			
Does the PHA expect to reopen the list in the PHA Plan year? <input type="checkbox"/> No <input type="checkbox"/> Yes			
Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input type="checkbox"/> No <input type="checkbox"/> Yes			

C. Strategy for Addressing Needs

Provide a brief description of the PHA's strategy for addressing the housing needs of families in the jurisdiction and on the waiting list **IN THE UPCOMING YEAR**, and the Agency's reasons for choosing this strategy.

(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:

Select all that apply

- Employ effective maintenance and management policies to minimize the number of public housing units off-line
- Reduce turnover time for vacated public housing units
- Reduce time to renovate public housing units
- Seek replacement of public housing units lost to the inventory through mixed finance development
- Seek replacement of public housing units lost to the inventory through section 8 replacement housing resources
- 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
- Other (list below)

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

Select all that apply

- Apply for additional section 8 units should they become available
- Leverage affordable housing resources in the community through the creation of mixed - finance housing
- Pursue housing resources other than public housing or Section 8 tenant-based assistance.
- Other: (list below)

Support the efforts of others to increase the number of affordable housing units.

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

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

Select all that apply

- 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
- Employ admissions preferences aimed at families with economic hardships
- Adopt rent policies to support and encourage work
- Other: (list below)

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

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

Select all that apply

- Employ admissions preferences aimed at families who are working
- Adopt rent policies to support and encourage work
- Other: (list below)

Need: Specific Family Types: The Elderly

Strategy 1: Target available assistance to the elderly:

Select all that apply

- Seek designation of public housing for the elderly
- Apply for special-purpose vouchers targeted to the elderly, should they become available
- Other: (list below)

Need: Specific Family Types: Families with Disabilities

Strategy 1: Target available assistance to Families with Disabilities:

Select all that apply

- Seek designation of public housing for families with disabilities
- Carry out the modifications needed in public housing based on the section 504 Needs Assessment for Public Housing
- Apply for special-purpose vouchers targeted to families with disabilities, should they become available
- Affirmatively market to local non-profit agencies that assist families with disabilities
- Other: (list below)

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:

Not Applicable

- Affirmatively market to races/ethnicities shown to have disproportionate housing needs
- Other: (list below)

Strategy 2: Conduct activities to affirmatively further fair housing

Select all that apply

- Counsel section 8 tenants as to location of units outside of areas of poverty or minority concentration and assist them to locate those units
- Market the section 8 program to owners outside of areas of poverty /minority concentrations
- Other: (list below)

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

(2) Reasons for Selecting Strategies

Of the factors listed below, select all that influenced the PHA'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
- Other: (list below)

2. Statement of Financial Resources

[24 CFR Part 903.7 9 (b)]

List the financial resources that are anticipated to be available to the PHA for the support of Federal public housing and tenant-based Section 8 assistance programs administered by the PHA during the Plan year. Note: the table assumes that Federal public housing or tenant based Section 8 assistance grant funds are expended on eligible purposes; therefore, uses of these funds need not be stated. For other funds, indicate the use for those funds as one of the following categories: public housing operations, public housing capital improvements, public housing safety/security, public housing supportive services, Section 8 tenant-based assistance, Section 8 supportive services or other.

Financial Resources: Planned Sources and Uses		
Sources	Planned \$(000)	Planned Uses
1. Federal Grants (FY 2005 grants)		
a) Public Housing Operating Fund	2,630	
b) Public Housing Capital Fund	1,773	
c) HOPE VI Revitalization		
d) HOPE VI Demolition		
e) Annual Contributions for Section 8 Tenant-Based Assistance	9,077	
f) Public Housing Drug Elimination Program (including any Technical Assistance funds)		
g) Resident Opportunity and Self-Sufficiency Grants		
h) Community Development Block Grant		
i) HOME		
Other Federal Grants (list below)		
2. Prior Year Federal Grants (unobligated funds only) (list below)		

Financial Resources: Planned Sources and Uses		
Sources	Planned \$(000)	Planned Uses
3. Public Housing Dwelling Rental Income	1,463	Routine Operating Expenses
4. Other income (list below)		
Interest Income	35	Other
Entrepreneurial Activities	62	Other
4. Non-federal sources (list below)		
Total resources	15,040	

3. PHA Policies Governing Eligibility, Selection, and Admissions

[24 CFR Part 903.7 9 (c)]

A. Public Housing

Exemptions: PHAs that do not administer public housing are not required to complete subcomponent 3A.

(1) Eligibility

a. When does the PHA verify eligibility for admission to public housing? (select all that apply)

- When families are within a certain number of being offered a unit: (state number)
- When families are within a certain time of being offered a unit: 90-120 days
- Other: (describe)

b. Which non-income (screening) factors does the PHA use to establish eligibility for admission to public housing (select all that apply)?

- Criminal or Drug-related activity
- Rental history
- Housekeeping
- Other (describe)

-Credit History, history of alcohol abuse, and prior experience in other subsidized housing programs.

- c. Yes No: Does the PHA request criminal records from local law enforcement agencies for screening purposes?
- d. Yes No: Does the PHA request criminal records from State law enforcement agencies for screening purposes?
- e. Yes No: Does the PHA access FBI criminal records from the FBI for screening purposes? (either directly or through an NCIC-authorized source)

(2)Waiting List Organization

a. Which methods does the PHA plan to use to organize its public housing waiting list (select all that apply)

- Community-wide list
- Sub-jurisdictional lists
- Site-based waiting lists (Implemented July 1, 2003)
- Other (describe)

b. Where may interested persons apply for admission to public housing?

- PHA main administrative office
- PHA development site management office
- Other (list below)

-Applicants may apply by mail. Applicants with disabilities may otherwise be accommodated.

c. If the PHA plans to operate one or more site-based waiting lists in the coming year, answer each of the following questions; if not, skip to subsection **(3) Assignment**

1. How many site-based waiting lists will the PHA operate in the coming year?

2. Yes No: Are any or all of the PHA's site-based waiting lists new for the upcoming year (that is, they are not part of a previously-HUD-approved site based waiting list plan)?
If yes, how many lists?

3. Yes No: May families be on more than one list simultaneously?
If yes, how many lists?

All lists for which they are eligible (i.e. given their status as elderly or family)

4. Where can interested persons obtain more information about and sign up to be on the site-based waiting lists (select all that apply)?

- PHA main administrative office

- All PHA development management offices
- Management offices at developments with site-based waiting lists
- At the development to which they would like to apply
- Other (list below)

(3) Assignment

a. How many vacant unit choices are applicants ordinarily given before they fall to the bottom of or are removed from the waiting list? (select one)

- One (Unless there are extenuating circumstances)
- Two
- Three or More

b. Yes No: Is this policy consistent across all waiting list types?

c. If answer to b is no, list variations for any other than the primary public housing waiting list/s for the PHA:

(4) Admissions Preferences

a. Income targeting:

- Yes No: Does the PHA plan 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:

In what circumstances will transfers take precedence over new admissions? (list below)

- Emergencies
- Overhoused
- Underhoused
- Medical justification
- Administrative reasons determined by the PHA (e.g., to permit modernization work)
- Resident choice: (state circumstances below)
- Other: (list below)

NOTE: See ACOP for specific transfer eligibility criteria.

c. Preferences

- 1. Yes No: Has the PHA established preferences for admission to public housing (other than date and time of application)? (If “no” is selected, skip to subsection **(5) Occupancy**)

2. Which of the following admission preferences does the PHA plan to employ in the coming year? (select all that apply from either former Federal preferences or other preferences)

Former Federal preferences:

- Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition)
- Victims of domestic violence
- Substandard housing
- Homelessness
- High rent burden (rent is > 50 percent of income)

Other preferences: (select below)

- Working families and those unable to work because of age or disability
- Veterans and veterans' families
- Residents who live and/or work in the jurisdiction
- Those enrolled currently in educational, training, or upward mobility programs
- Households that contribute to meeting income goals (broad range of incomes)
- Households that contribute to meeting income requirements (targeting)
- Those previously enrolled in educational, training, or upward mobility programs
- Victims of reprisals or hate crimes
- Other preference(s) (list below)

- Inter-program Transfers
- Local Disaster Victims
- Law Enforcement/Teachers
- Excessive Shelter Costs/Unstable Housing (Incorporates all of former federal preferences)

3. If the PHA will employ admissions preferences, please prioritize by placing a "1" in the space that represents your first priority, a "2" in the box representing your second priority, and so on. If you give equal weight to one or more of these choices (either through an absolute hierarchy or through a point system), place the same number next to each. That means you can use "1" more than once, "2" more than once, etc.

Date and Time (First priority among applicants with same number of preference points)

Former Federal preferences:

- Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition)
- Victims of domestic violence
- Substandard housing
- Homelessness

High rent burden

Other preferences (select all that apply)

- Working families and those unable to work because of age or disability -2
- Veterans and veterans' families -1
- Residents who live and/or work in the jurisdiction -10
- Those enrolled currently in educational, training, or upward mobility programs-2
- Households that contribute to meeting income goals (broad range of incomes) (separate tier)
- Households that contribute to meeting income requirements (targeting)
- Those previously enrolled in educational, training, or upward mobility programs
- Victims of reprisals or hate crimes
- Other preference(s) (list below)

-Inter-program Transfers - 7 points

-Law Enforcement/Teachers – 6 points

-Local Disaster Victims - 5 points

-Excessive Shelter Costs/Unstable Housing – 1 point

4. Relationship of preferences to income targeting requirements:

- The PHA applies preferences within income tiers
- Not applicable: the pool of applicant families ensures that the PHA will meet income targeting requirements

(5) Occupancy

a. What reference materials can applicants and residents use to obtain information about the rules of occupancy of public housing (select all that apply)

- The PHA-resident lease
- The PHA's Admissions and (Continued) Occupancy policy
- PHA briefing seminars or written materials
- Other source (list)
-Orientation video

b. How often must residents notify the PHA of changes in family composition? (select all that apply)

- At an annual reexamination and lease renewal
- Any time family composition changes
- At family request for revision
- Other (list)

(6) Deconcentration and Income Mixing

a. Yes No: Did the PHA's analysis of its family (general occupancy) developments to determine concentrations of poverty indicate the need for measures to promote deconcentration of poverty or income mixing?

b. Yes No: Did the PHA adopt any changes to its **admissions policies** based on the results of the required analysis of the need to promote deconcentration of poverty or to assure income mixing? (Provision already in place)

c. If the answer to b was yes, what changes were adopted? (select all that apply)

Adoption of site based waiting lists
If selected, list targeted developments below:

Employing waiting list "skipping" to achieve deconcentration of poverty or income mixing goals at targeted developments
If selected, list targeted developments below:
30-10 Private Mathison Manor

Employing new admission preferences at targeted developments
If selected, list targeted developments below:
30-10 Private Mathison Manor

Other (list policies and developments targeted below)

d. Yes No: Did the PHA adopt any changes to **other** policies based on the results of the required analysis of the need for deconcentration of poverty and income mixing?

e. If the answer to d was yes, how would you describe these changes? (select all that apply)

- Additional affirmative marketing
- Actions to improve the marketability of certain developments
- Adoption or adjustment of ceiling rents for certain developments
- Adoption of rent incentives to encourage deconcentration of poverty and income-mixing
- Other (list below)

f. Based on the results of the required analysis, in which developments will the PHA make special efforts to attract or retain higher-income families? (select all that apply)

Not applicable: results of analysis did not indicate a need for such efforts

- List (any applicable) developments below:
30-10 Private Mathison Manor

g. Based on the results of the required analysis, in which developments will the PHA make special efforts to assure access for lower-income families? (select all that apply)

- Not applicable: results of analysis did not indicate a need for such efforts
 List (any applicable) developments below:

B. Section 8

Exemptions: PHAs that do not administer section 8 are not required to complete sub-component 3B.
Unless otherwise specified, all questions in this section apply only to the tenant-based section 8 assistance program (vouchers, and until completely merged into the voucher program, certificates).

(1) Eligibility

a. What is the extent of screening conducted by the PHA? (select all that apply)

- Criminal or drug-related activity only to the extent required by law or regulation
 Criminal and drug-related activity, more extensively than required by law or regulation
 More general screening than criminal and drug-related activity (list factors below)
 Other (list below)

-Outstanding debt to PHA or other federally assisted housing provider.

b. Yes No: Does the PHA request criminal records from local law enforcement agencies for screening purposes?

c. Yes No: Does the PHA request criminal records from State law enforcement agencies for screening purposes?

d. Yes No: Does the PHA access FBI criminal records from the FBI for screening purposes? (Either directly or through an NCIC-authorized source)

e. Indicate what kinds of information you share with prospective landlords? (select all that apply)

- Criminal or drug-related activity
 Other (describe below)

-Prior housing history information (including rent payment and general occupancy matters)

(2) Waiting List Organization

a. With which of the following program waiting lists is the section 8 tenant-based assistance waiting list merged? (select all that apply)

- None
- Federal public housing
- Federal moderate rehabilitation
- Federal project-based certificate program
- Other federal or local program (list below)

b. Where may interested persons apply for admission to section 8 tenant-based assistance? (select all that apply)

- PHA main administrative office
- Other (list below)

-Mailed upon request

(3) Search Time

a. Yes No: Does the PHA give extensions on standard 60-day period to search for a unit?

If yes, state circumstances below:

-Across the board 120 days due to general difficulty participants are having in finding units.

(4) Admissions Preferences

a. Income targeting

Yes No: Does the PHA plan to exceed the federal targeting requirements by targeting more than 75% of all new admissions to the section 8 program to families at or below 30% of median area income?

b. Preferences

1. Yes No: Has the PHA established preferences for admission to section 8 tenant-based assistance? (other than date and time of application) (if no, skip to subcomponent **(5) Special purpose section 8 assistance programs**)

2. Which of the following admission preferences does the PHA plan to employ in the coming year? (select all that apply from either former Federal preferences or other preferences)

Former Federal preferences

- Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition)
- Victims of domestic violence
- Substandard housing
- Homelessness
- High rent burden (rent is > 50 percent of income)

Other preferences (select all that apply)

- Working families and those unable to work because of age or disability
- Veterans and veterans' families
- Residents who live and/or work in your jurisdiction
- Those enrolled currently in educational, training, or upward mobility programs
- Households that contribute to meeting income goals (broad range of incomes)
- Households that contribute to meeting income requirements (targeting)
- Those previously enrolled in educational, training, or upward mobility programs
- Victims of reprisals or hate crimes
- Other preference(s) (list below)

-Excessive Shelter Costs/Unstable Housing – 1 point (incorporates all of former federal preferences)

3. If the PHA will employ admissions preferences, please prioritize by placing a "1" in the space that represents your first priority, a "2" in the box representing your second priority, and so on. If you give equal weight to one or more of these choices (either through an absolute hierarchy or through a point system), place the same number next to each. That means you can use "1" more than once, "2" more than once, etc.

Date and Time (Highest priority among applicants with same number of preference points)

Former Federal preferences

- Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition)
- Victims of domestic violence
- Substandard housing
- Homelessness
- High rent burden

Other preferences (select all that apply)

- Working families and those unable to work because of age or disability -2
- Veterans and veterans' families
- Residents who live and/or work in your jurisdiction -10
- Those enrolled currently in educational, training, or upward mobility programs-2
- Households that contribute to meeting income goals (broad range of incomes)
- Households that contribute to meeting income requirements (targeting)
- Those previously enrolled in educational, training, or upward mobility programs
- Victims of reprisals or hate crimes
- Other preference(s) (list below)

-Excessive Shelter Costs/Unstable Housing – 1 point

4. Among applicants on the waiting list with equal preference status, how are applicants selected? (select one)

- Date and time of application
- Drawing (lottery) or other random choice technique

5. If the PHA plans to employ preferences for “residents who live and/or work in the jurisdiction” (select one)

- This preference has previously been reviewed and approved by HUD
- The PHA requests approval for this preference through this PHA Plan

6. Relationship of preferences to income targeting requirements: (select one)

- The PHA applies preferences within income tiers
- Not applicable: the pool of applicant families ensures that the PHA will meet income targeting requirements

(5) Special Purpose Section 8 Assistance Programs

Not Applicable---no special-purpose Section 8 Program Exists

a. In which documents or other reference materials are the policies governing eligibility, selection, and admissions to any special-purpose section 8 program administered by the PHA contained? (select all that apply)

- The Section 8 Administrative Plan
- Briefing sessions and written materials
- Other (list below)

b. How does the PHA announce the availability of any special-purpose section 8 programs to the public?

- Through published notices
- Other (list below)

4. PHA Rent Determination Policies

[24 CFR Part 903.7 9 (d)]

A. Public Housing

Exemptions: PHAs that do not administer public housing are not required to complete sub-component 4A.

(1) Income Based Rent Policies

Describe the PHA's income based rent setting policy/ies for public housing using, including discretionary (that is, not required by statute or regulation) income disregards and exclusions, in the appropriate spaces below.

a. Use of discretionary policies: (select one)

- The PHA will not employ any discretionary rent-setting policies for income based rent in public housing. Income-based rents are set at the higher of 30% of adjusted monthly income, 10% of unadjusted monthly income, the welfare rent, or minimum rent (less HUD mandatory deductions and exclusions). (If selected, skip to sub-component (2))

---or---

- The PHA employs discretionary policies for determining income based rent (If selected, continue to question b.)

b. Minimum Rent

1. What amount best reflects the PHA's minimum rent? (select one)

- \$0
- \$1-\$25
- \$26-\$50

2. Yes No: Has the PHA adopted any discretionary minimum rent hardship exemption policies?

3. If yes to question 2, list these policies below:

c. Rents set at less than 30% than adjusted income

1. Yes No: Does the PHA plan to charge rents at a fixed amount or percentage less than 30% of adjusted income?
2. If yes to above, list the amounts or percentages charged and the circumstances under which these will be used below:

-Flat Rent and Ceiling Rent Schedules

d. Which of the discretionary (optional) deductions and/or exclusions policies does the PHA plan to employ (select all that apply)

- For the earned income of a previously unemployed household member
- For increases in earned income
- Fixed amount (other than general rent-setting policy)
If yes, state amount/s and circumstances below:
- Fixed percentage (other than general rent-setting policy)
If yes, state percentage/s and circumstances below:
- For household heads
- For other family members
- For transportation expenses
- For the non-reimbursed medical expenses of non-disabled or non-elderly families
- Other (describe below)

e. Ceiling rents

1. Do you have ceiling rents? (rents set at a level lower than 30% of adjusted income) (select one)

- Yes for all developments
- Yes but only for some developments
- No

2. For which kinds of developments are ceiling rents in place? (select all that apply)

- For all developments
- For all general occupancy developments (not elderly or disabled or elderly only)
- For specified general occupancy developments
- For certain parts of developments; e.g., the high-rise portion
- For certain size units; e.g., larger bedroom sizes
- Other (list below)

3. Select the space or spaces that best describe how you arrive at ceiling rents (select all that apply)

- Market comparability study
- Fair market rents (FMR)
- 95th percentile rents
- 75 percent of operating costs
- 100 percent of operating costs for general occupancy (family) developments
- Operating costs plus debt service
- The "rental value" of the unit
- Other (list below)

f. Rent re-determinations:

1. Between income reexaminations, how often must tenants report changes in income or family composition to the PHA such that the changes result in an adjustment to rent? (select all that apply)

- Never
- At family option
- Any time the family experiences an income increase
- Any time a family experiences an income increase above a threshold amount or percentage: (if selected, specify threshold) _____
- Other (list below)

- All family composition changes must be reported and documented;
- Households with negative rents (UAPs) must report income increases;
- Households with members that start receiving new benefit source (i.e. SS/SSI, TANF, GA) must report.

g. Yes No: Does the PHA plan to implement individual savings accounts for residents (ISAs) as an alternative to the required 12 month disallowance of earned income and phasing in of rent increases in the next year?

(2) Flat Rents

1. In setting the market-based flat rents, what sources of information did the PHA use to establish comparability? (select all that apply.)

- The section 8 rent reasonableness study of comparable housing
- Survey of rents listed in local newspaper
- Survey of similar unassisted units in the neighborhood
- Other (list/describe below)

B. Section 8 Tenant-Based Assistance

Exemptions: PHAs that do not administer Section 8 tenant-based assistance are not required to complete sub-component 4B. **Unless otherwise specified, all questions in this section apply only to the tenant-based section 8 assistance program (vouchers, and until completely merged into the voucher program, certificates).**

(1) Payment Standards

Describe the voucher payment standards and policies.

a. What is the PHA's payment standard? (select the category that best describes your standard)

- At or above 90% but below 100% of FMR
- 100% of FMR
- Above 100% but at or below 110% of FMR
- Above 110% of FMR (if HUD approved; describe circumstances below)

b. If the payment standard is lower than FMR, why has the PHA selected this standard? (select all that apply)

- FMRs are adequate to ensure success among assisted families in the PHA's segment of the FMR area
- The PHA has chosen to serve additional families by lowering the payment standard
- Reflects market or submarket
- Other (list below)

c. If the payment standard is higher than FMR, why has the PHA chosen this level? (select all that apply)

- FMRs are not adequate to ensure success among assisted families in the PHA's segment of the FMR area
- Reflects market or submarket
- To increase housing options for families
- Other (list below)

d. How often are payment standards reevaluated for adequacy? (select one)

- Annually
- Other (list below)

-Every Six (6) months

e. What factors will the PHA consider in its assessment of the adequacy of its payment standard? (select all that apply)

- Success rates of assisted families
- Rent burdens of assisted families

Other (list below)

(2) Minimum Rent

a. What amount best reflects the PHA's minimum rent? (select one)

- \$0
 \$1-\$25
 \$26-\$50

b. Yes No: Has the PHA adopted any discretionary minimum rent hardship exemption policies? (if yes, list below)

5. Operations and Management

[24 CFR Part 903.7 9 (e)]

Exemptions from Component 5: High performing and small PHAs are not required to complete this section. Section 8 only PHAs must complete parts A, B, and C(2)

A. PHA Management Structure

Describe the PHA's management structure and organization.

(select one)

- An organization chart showing the PHA's management structure and organization is attached.
- A brief description of the management structure and organization of the PHA follows:

For efficiency and effective management, SCCHA is organized in to five functional departments: Administrative, Finance, Management (Public Housing), Maintenance/Technical Services, and Section 8. Data Processing is under the direction of Finance. Procurement is considered an administrative function. Application Intake (for all programs) is performed under the supervision of the Program Director (i.e. Section 8). Modernization activities fall under the purview of the Technical Services division.

B. HUD Programs Under PHA Management

List Federal programs administered by the PHA, number of families served at the beginning of the upcoming fiscal year, and expected turnover in each. (Use "NA" to indicate that the PHA does not operate any of the programs listed below.)

Program Name	Units or Families Served at Year Beginning (1/1/05)	Expected Turnover
Public Housing	963 (96%)	150 (15%)
Section 8 Vouchers	1,831(98%)	323 (18%)
Section 8 Certificates		

Section 8 Mod Rehab		
Special Purpose Section 8 Certificates/Vouchers (list individually)		
Public Housing Drug Elimination Program (PHDEP)		
Other Federal Programs(list individually)		

C. Management and Maintenance Policies

List the PHA’s public housing management and maintenance policy documents, manuals and handbooks that contain the Agency’s rules, standards, and policies that govern maintenance and management of public housing, including a description of any measures necessary for the prevention or eradication of pest infestation (which includes cockroach infestation) and the policies governing Section 8 management.

- Public Housing Maintenance and Management: (list below)
 - Admissions and Continued Occupancy Policy
 - Ban & Bar Policy
 - Blood Borne Disease Policy
 - Capitalization Policy
 - Check Signing Policy
 - Collection Policy
 - Criminal Records Management Policy
 - Disposition Policy
 - Drug Free Policy
 - Emergency Service Guidelines
 - Equal Housing Opportunities Policy
 - Ethics Policy
 - Facilities Use Policy
 - Funds Transfer Policy
 - Grievance Policy
 - Hazardous Materials Policy
 - Investment Policy
 - Maintenance Policy

- Natural Disaster Policy
- Personnel Policy
- Pest Infestation Control Policy
- Procurement Policy
- Re-housing Determination Policy
- Service Charge Policy
- Smoking Policy for Hi-Rise Buildings
- Travel Policy

(2) Section 8 Management: (list below)

- Administrative Plan

6. PHA Grievance Procedures

[24 CFR Part 903.7 9 (f)]

Exemptions from component 6: High performing PHAs are not required to complete component 6. Section 8-Only PHAs are exempt from sub-component 6A.

A. Public Housing

1. Yes No: Has the PHA established any written grievance procedures in addition to federal requirements found at 24 CFR Part 966, Subpart B, for residents of public housing?

If yes, list additions to federal requirements below:

2. Which PHA office should residents or applicants to public housing contact to initiate the PHA grievance process? (select all that apply)

- PHA main administrative office
- PHA development management offices
- Other (list below)

B. Section 8 Tenant-Based Assistance

1. Yes No: Has the PHA established informal review procedures for applicants to the Section 8 tenant-based assistance program and informal hearing procedures for families assisted by the Section 8 tenant-based assistance program in addition to federal requirements found at 24 CFR 982?

If yes, list additions to federal requirements below:

2. Which PHA office should applicants or assisted families contact to initiate the informal review and informal hearing processes? (select all that apply)

- PHA main administrative office
 Other (list below)

7. Capital Improvement Needs

[24 CFR Part 903.7 9 (g)]

Exemptions from Component 7: Section 8 only PHAs are not required to complete this component and may skip to Component 8.

A. Capital Fund Activities

Exemptions from sub-component 7A: PHAs that will not participate in the Capital Fund Program may skip to component 7B. All other PHAs must complete 7A as instructed.

(1) Capital Fund Program Annual Statement

Using parts I, II, and III of the Annual Statement for the Capital Fund Program (CFP), identify capital activities the PHA is proposing for the upcoming year to ensure long-term physical and social viability of its public housing developments. This statement can be completed by using the CFP Annual Statement tables provided in the table library at the end of the PHA Plan template **OR**, at the PHA's option, by completing and attaching a properly updated HUD-52837.

Select one:

- The Capital Fund Program Annual Statement is provided as an attachment to the PHA Plan at Attachment (state name) IL30

-or-

- The Capital Fund Program Annual Statement is provided below: (if selected, copy the CFP Annual Statement from the Table Library and insert here)

(2) Optional 5-Year Action Plan

Agencies are encouraged to include a 5-Year Action Plan covering capital work items. This statement can be completed by using the 5 Year Action Plan table provided in the table library at the end of the PHA Plan template **OR** by completing and attaching a properly updated HUD-52834.

- a. Yes No: Is the PHA providing an optional 5-Year Action Plan for the Capital Fund? (if no, skip to sub-component 7B)

b. If yes to question a, select one:

- The Capital Fund Program 5-Year Action Plan is provided as an attachment to the PHA Plan at Attachment (state name) IL30

-or-

- The Capital Fund Program 5-Year Action Plan is provided below: (if selected, copy the CFP optional 5 Year Action Plan from the Table Library and insert here)

B. HOPE VI and Public Housing Development and Replacement Activities (Non-Capital Fund)

Applicability of sub-component 7B: All PHAs administering public housing. Identify any approved HOPE VI and/or public housing development or replacement activities not described in the Capital Fund Program Annual Statement.

- Yes No: a) Has the PHA received a HOPE VI revitalization grant? (if no, skip to question c; if yes, provide responses to question b for each grant, copying and completing as many times as necessary)
b) Status of HOPE VI revitalization grant (complete one set of questions for each grant)

1. Development name:
2. Development (project) number:
3. Status of grant: (select the statement that best describes the current status)
 - Revitalization Plan under development
 - Revitalization Plan submitted, pending approval
 - Revitalization Plan approved
 - Activities pursuant to an approved Revitalization Plan underway

- Yes No: c) Does the PHA plan to apply for a HOPE VI Revitalization grant in the Plan year?
If yes, list development name/s below:

- Yes No: d) Will the PHA be engaging in any mixed-finance development activities for public housing in the Plan year?
If yes, list developments or activities below:

- Yes No: e) Will the PHA be conducting any other public housing development or replacement activities not discussed in the Capital Fund Program Annual Statement?
If yes, list developments or activities below:

8. Demolition and Disposition

[24 CFR Part 903.7 9 (h)]

Applicability of component 8: Section 8 only PHAs are not required to complete this section.

1. Yes No: Does the PHA plan to conduct any demolition or disposition activities (pursuant to section 18 of the U.S. Housing Act of 1937 (42 U.S.C. 1437p)) in the plan Fiscal Year? (If “No”, skip to component 9; if “yes”, complete one activity description for each development.)

2. Activity Description

- Yes No: Has the PHA provided the activities description information in the **optional** Public Housing Asset Management Table? (If “yes”, skip to component 9. If “No”, complete the Activity Description table below.)

Demolition/Disposition Activity Description
1a. Development name: 1b. Development (project) number:
2. Activity type: Demolition <input type="checkbox"/> Disposition <input type="checkbox"/>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date application approved, submitted, or planned for submission: (DD/MM/YY)
5. Number of units affected: 6. Coverage of action (select one) <input type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. Actual or projected start date of activity: b. Projected end date of activity:

9. Designation of Public Housing for Occupancy by Elderly Families or Families with Disabilities or Elderly Families and Families with Disabilities

[24 CFR Part 903.7 9 (i)]

Exemptions from Component 9; Section 8 only PHAs are not required to complete this section.

1. Yes No: Has the PHA designated or applied for approval to designate or does the PHA plan to apply to designate any public housing for occupancy only by the elderly families or only by families with disabilities, or by elderly families and families with disabilities or will apply for designation for occupancy by only elderly families or

only families with disabilities, or by elderly families and families with disabilities as provided by section 7 of the U.S. Housing Act of 1937 (42 U.S.C. 1437e) in the upcoming fiscal year? (If “No”, skip to component 10. If “yes”, complete one activity description for each development, unless the PHA is eligible to complete a streamlined submission; PHAs completing streamlined submissions may skip to component 10.)

2. Activity Description

Yes No: Has the PHA provided all required activity description information for this component in the **optional** Public Housing Asset Management Table? If “yes”, skip to component 10. If “No”, complete the Activity Description table below.

Designation of Public Housing Activity Description	
1a. Development name:	
1b. Development (project) number:	
2. Designation type:	Occupancy by only the elderly <input type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities <input type="checkbox"/>
3. Application status (select one)	Approved; included in the PHA’s Designation Plan <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date this designation approved, submitted, or planned for submission:	
5. If approved, will this designation constitute a (select one)	<input type="checkbox"/> New Designation Plan <input type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 34	
7. Coverage of action (select one)	<input type="checkbox"/> Part of the development <input type="checkbox"/> Total development

10. Conversion of Public Housing to Tenant-Based Assistance

[24 CFR Part 903.7 9 (j)]

Exemptions from Component 10; Section 8 only PHAs are not required to complete this section.

A. Assessments of Reasonable Revitalization Pursuant to section 202 of the HUD FY 1996 HUD Appropriations Act

1. Yes No: Have any of the PHA’s developments or portions of developments been identified by HUD or the PHA as covered under section 202 of the HUD FY 1996 HUD Appropriations Act? (If “No”, skip to component 11; if “yes”, complete one activity description for each

identified development, unless eligible to complete a streamlined submission. PHAs completing streamlined submissions may skip to component 11.)

2. Activity Description

Yes No: Has the PHA provided all required activity description information for this component in the **optional** Public Housing Asset Management Table? If “yes”, skip to component 11. If “No”, complete the Activity Description table below.

Conversion of Public Housing Activity Description	
1a. Development name:	
1b. Development (project) number:	
2. What is the status of the required assessment?	
<input type="checkbox"/> Assessment underway <input type="checkbox"/> Assessment results submitted to HUD <input type="checkbox"/> Assessment results approved by HUD (if marked, proceed to next question) <input type="checkbox"/> Other (explain below)	
3. <input type="checkbox"/> Yes <input type="checkbox"/> No: Is a Conversion Plan required? (If yes, go to block 4; if no, go to block 5.)	
4. Status of Conversion Plan (select the statement that best describes the current status)	
<input type="checkbox"/> Conversion Plan in development <input type="checkbox"/> Conversion Plan submitted to HUD on: (DD/MM/YYYY) <input type="checkbox"/> Conversion Plan approved by HUD on: (DD/MM/YYYY) <input type="checkbox"/> Activities pursuant to HUD-approved Conversion Plan underway	
5. Description of how requirements of Section 202 are being satisfied by means other than conversion (select one)	
<input type="checkbox"/> Units addressed in a pending or approved demolition application (date submitted or approved:) <input type="checkbox"/> Units addressed in a pending or approved HOPE VI demolition application (date submitted or approved:) <input type="checkbox"/> Units addressed in a pending or approved HOPE VI Revitalization Plan (date submitted or approved:) <input type="checkbox"/> Requirements no longer applicable: vacancy rates are less than 10 percent <input type="checkbox"/> Requirements no longer applicable: site now has less than 300 units <input type="checkbox"/> Other: (describe below)	

B. Reserved for Conversions pursuant to Section 22 of the U.S. Housing Act of 1937

C. Reserved for Conversions pursuant to Section 33 of the U.S. Housing Act of 1937

11. Homeownership Programs Administered by the PHA

[24 CFR Part 903.7 9 (k)]

A. Public Housing

Exemptions from Component 11A: Section 8 only PHAs are not required to complete 11A.

1. Yes No: Does the PHA administer any homeownership programs administered by the PHA under an approved section 5(h) homeownership program (42 U.S.C. 1437c(h)), or an approved HOPE I program (42 U.S.C. 1437aaa) or has the PHA applied or plan to apply to administer any homeownership programs under section 5(h), the HOPE I program, or section 32 of the U.S. Housing Act of 1937 (42 U.S.C. 1437z-4). (If “No”, skip to component 11B; if “yes”, complete one activity description for each applicable program/plan, unless eligible to complete a streamlined submission due to **small PHA** or **high performing PHA** status. PHAs completing streamlined submissions may skip to component 11B.)

2. Activity Description
 Yes No: Has the PHA provided all required activity description information for this component in the **optional** Public Housing Asset Management Table? (If “yes”, skip to component 12. If “No”, complete the Activity Description table below.)

Public Housing Homeownership Activity Description (Complete one for each development affected)
1a. Development name: 1b. Development (project) number:
2. Federal Program authority: <input type="checkbox"/> HOPE I <input type="checkbox"/> 5(h) <input type="checkbox"/> Turnkey III <input type="checkbox"/> Section 32 of the USHA of 1937 (effective 10/1/99)
3. Application status: (select one) <input type="checkbox"/> Approved; included in the PHA’s Homeownership Plan/Program <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date Homeownership Plan/Program approved, submitted, or planned for submission:

(DD/MM/YYYY)

5. Number of units affected:
6. Coverage of action: (select one)
 Part of the development
 Total development

B. Section 8 Tenant Based Assistance

1. Yes No: Does the PHA plan to administer a Section 8 Homeownership program pursuant to Section 8(y) of the U.S.H.A. of 1937, as implemented by 24 CFR part 982 ? (If “No”, skip to component 12; if “yes”, describe each program using the table below (copy and complete questions for each program identified), unless the PHA is eligible to complete a streamlined submission due to high performer status. **High performing PHAs** may skip to component 12.)

2. Program Description:

a. Size of Program

- Yes No: Will the PHA limit the number of families participating in the section 8 homeownership option?

If the answer to the question above was yes, which statement best describes the number of participants? (select one)

- 25 or fewer participants
 26 - 50 participants
 51 to 100 participants
 more than 100 participants

b. PHA-established eligibility criteria

- Yes No: Will the PHA’s program have eligibility criteria for participation in its Section 8 Homeownership Option program in addition to HUD criteria?

If yes, list criteria below:

12. PHA Community Service and Self-sufficiency Programs

[24 CFR Part 903.7 9 (l)]

Exemptions from Component 12: High performing and small PHAs are not required to complete this component. Section 8-Only PHAs are not required to complete sub-component C.

A. PHA Coordination with the Welfare (TANF) Agency

1. Cooperative agreements:

- Yes No: Has the PHA entered into a cooperative agreement with the TANF Agency, to share information and/or target supportive services (as contemplated by section 12(d)(7) of the Housing Act of 1937)?

If yes, what was the date that agreement was signed? 06/06/96

2. Other coordination efforts between the PHA and TANF agency (select all that apply)

- Client referrals
- Information sharing regarding mutual clients (for rent determinations and otherwise)
- Coordinate the provision of specific social and self-sufficiency services and programs to eligible families
- Jointly administer programs
- Partner to administer a HUD Welfare-to-Work voucher program
- Joint administration of other demonstration program
- Other (describe)

B. Services and programs offered to residents and participants

(1) General

a. Self-Sufficiency Policies

Which, if any of the following discretionary policies will the PHA employ to enhance the economic and social self-sufficiency of assisted families in the following areas? (select all that apply)

- Public housing rent determination policies
- Public housing admissions policies
- Section 8 admissions policies
- Preference in admission to section 8 for certain public housing families
- Preferences for families working or engaging in training or education programs for non-housing programs operated or coordinated by the PHA
- Preference/eligibility for public housing homeownership option participation
- Preference/eligibility for section 8 homeownership option participation
- Other policies (list below)

b. Economic and Social self-sufficiency programs

- Yes No: Does the PHA coordinate, promote or provide any programs to enhance the economic and social self-sufficiency of residents? (If "yes", complete the following table; if "no" skip to sub-component 2, Family Self Sufficiency Programs. The position of the table may be altered to facilitate its use.)

Services and Programs				
Program Name & Description (including location, if appropriate)	Estimated Size	Allocation Method (waiting list/random selection/specific criteria/other)	Access (development office / PHA main office / other provider name)	Eligibility (public housing or section 8 participants or both)
Family Resource Center (I & R)	50-75	Open Enrollment	Development Office (2)	Public Housing
Family Self-Sufficiency-Local	25	Specific Criteria	Main Office	Public Housing
Senior Service Coordination	559	Senior/Disabled	SWIC/PSOP	Public Housing

(2) Family Self Sufficiency program/s –Not Applicable

a. Participation Description

Family Self Sufficiency (FSS) Participation		
Program	Required Number of Participants (start of FY 2005 Estimate)	Actual Number of Participants (As of: DD/MM/YY)
Public Housing		
Section 8		

b. Yes No: If the PHA is not maintaining the minimum program size required by HUD, does the most recent FSS Action Plan address the steps the PHA plans to take to achieve at least the minimum program size?

If no, list steps the PHA will take below:

C. Welfare Benefit Reductions

1. The PHA 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: (select all that apply)

- Adopting appropriate changes to the PHA’s public housing rent determination policies and train staff to carry out those policies
- Informing residents of new policy on admission and reexamination

- Actively notifying residents of new policy at times in addition to admission and reexamination.
- Establishing or pursuing a cooperative agreement with all appropriate TANF agencies regarding the exchange of information and coordination of services
- Establishing a protocol for exchange of information with all appropriate TANF agencies
- Other: (list below)

D. Reserved for Community Service Requirement pursuant to section 12(c) of the U.S. Housing Act of 1937

13. PHA Safety and Crime Prevention Measures

[24 CFR Part 903.7 9 (m)]

Exemptions from Component 13: High performing and small PHAs not participating in PHDEP and Section 8 Only PHAs may skip to component 15. High Performing and small PHAs that are participating in PHDEP and are submitting a PHDEP Plan with this PHA Plan may skip to sub-component D.

Note: PHDEP Grants no longer funded

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

1. Describe the need for measures to ensure the safety of public housing residents (select all that apply)

- High incidence of violent and/or drug-related crime in some or all of the PHA's developments
- High incidence of violent and/or drug-related crime in the areas surrounding or adjacent to the PHA'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
- Other (describe below)

2. What information or data did the PHA used to determine the need for PHA actions to improve safety of residents (select all that apply).

- Safety and security survey of residents
- Analysis of crime statistics over time for crimes committed "in and around" public housing authority
- Analysis of cost trends over time for repair of vandalism and removal of graffiti
- Resident reports
- PHA employee reports
- Police reports

- Demonstrable, quantifiable success with previous or ongoing anticrime/anti drug programs
- Other (describe below)

3. Which developments are most affected? (list below)

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)

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

1. List the crime prevention activities the PHA has undertaken or plans to undertake: (select all that apply)

- Contracting with outside and/or resident organizations for the provision of crime- and/or drug-prevention activities
- Crime Prevention Through Environmental Design
- Activities targeted to at-risk youth, adults, or seniors
- Volunteer Resident Patrol/Block Watchers Program
- Other (describe below)

2. Which developments are most affected? (list below)

Developments in Alorton, Brooklyn, and Centreville

C. Coordination between PHA and the police

1. Describe the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities: (select all that apply)

- Police involvement in development, implementation, and/or ongoing evaluation of drug-elimination plan
- 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 office, officer in residence)
- Police regularly testify in and otherwise support eviction cases
- Police regularly meet with the PHA management and residents
- Agreement between PHA and local law enforcement agency for provision of above-baseline law enforcement services
- Other activities (list below)

2. Which developments are most affected? (list below)

Developments in Alorton, Brooklyn, and Centreville

D. Additional information as required by PHDEP/PHDEP Plan (Not Applicable)

PHAs eligible for FY 2005 PHDEP funds must provide a PHDEP Plan meeting specified requirements prior to receipt of PHDEP funds.

- Yes No: Is the PHA eligible to participate in the PHDEP in the fiscal year covered by this PHA Plan?
- Yes No: Has the PHA included the PHDEP Plan for FY 2005 in this PHA Plan?
- Yes No: This PHDEP Plan is an Attachment. (Attachment Filename: ____)

14. RESERVED FOR PET POLICY

[24 CFR Part 903.7 9 (n)]

15. Civil Rights Certifications

[24 CFR Part 903.7 9 (o)]

Civil rights certifications are included in the PHA Plan Certifications of Compliance with the PHA Plans and Related Regulations.

16. Fiscal Audit

[24 CFR Part 903.7 9 (p)]

1. Yes No: Is the PHA required to have an audit conducted under section 5(h)(2) of the U.S. Housing Act of 1937 (42 U.S.C. 1437c(h))?
(If no, skip to component 17.)
2. Yes No: Was the most recent fiscal audit submitted to HUD?
3. Yes No: Were there any findings as the result of that audit?
4. Yes No: If there were any findings, do any remain unresolved?
If yes, how many unresolved findings remain? _____
5. Yes No: Have responses to any unresolved findings been submitted to HUD?
If not, when are they due (state below)?

17. PHA Asset Management

[24 CFR Part 903.7 9 (q)]

Exemptions from component 17: Section 8 Only PHAs are not required to complete this component. High performing and small PHAs are not required to complete this component.

1. Yes No: Is the PHA engaging in any activities that will contribute to the long-term asset management of its public housing stock, including how the Agency will plan for long-term operating, capital investment,

rehabilitation, modernization, disposition, and other needs that have **not** been addressed elsewhere in this PHA Plan?

2. What types of asset management activities will the PHA undertake? (select all that apply)

- Not applicable
- Private management
- Development-based accounting
- Comprehensive stock assessment
- Other: (list below)

3. Yes No: Has the PHA included descriptions of asset management activities in the **optional** Public Housing Asset Management Table?

18. Other Information

[24 CFR Part 903.7 9 (r)]

A. Resident Advisory Board Recommendations

1. Yes No: Did the PHA receive any comments on the PHA Plan from the Resident Advisory Board/s?

2. If yes, the comments are: (if comments were received, the PHA **MUST** select one)

- Attached at Attachment (File name) IL30j01
- Provided below:

3. In what manner did the PHA address those comments? (select all that apply)

- Considered comments, but determined that no changes to the PHA Plan were necessary.
- The PHA changed portions of the PHA Plan in response to comments
List changes below:

Other: (list below)

Used Resident Advisory input in developing the plan.

B. Description of Election process for Residents on the PHA Board

1. Yes No: Does the PHA meet the exemption criteria provided section 2(b)(2) of the U.S. Housing Act of 1937? (If no, continue to question 2; if yes, skip to sub-component C.)

2. Yes No: Was the resident who serves on the PHA Board elected by the residents? (If yes, continue to question 3; if no, skip to sub-component C.)

3. Description of Resident Election Process

a. Nomination of candidates for place on the ballot: (select all that apply)

- Candidates were nominated by resident and assisted family organizations
 Candidates could be nominated by any adult recipient of PHA assistance
 Self-nomination: Candidates registered with the PHA and requested a place on ballot
 Other: (describe)

b. Eligible candidates: (select one)

- Any recipient of PHA assistance
 Any head of household receiving PHA assistance
 Any adult recipient of PHA assistance
 Any adult member of a resident or assisted family organization
 Other (list)

c. Eligible voters: (select all that apply)

- All adult recipients of PHA assistance (public housing and section 8 tenant-based assistance)
 Representatives of all PHA resident and assisted family organizations
 Other (list)

C. Statement of Consistency with the Consolidated Plan

For each applicable Consolidated Plan, make the following statement (copy questions as many times as necessary).

1. Consolidated Plan jurisdiction: (St. Clair County)

2. The PHA has taken the following steps to ensure consistency of this PHA Plan with the Consolidated Plan for the jurisdiction: (select all that apply)

- The PHA has based its statement of needs of families in the jurisdiction on the needs expressed in the Consolidated Plan/s.
 The PHA has participated in any consultation process organized and offered by the Consolidated Plan agency in the development of the Consolidated Plan.
 The PHA has consulted with the Consolidated Plan agency during the development of this PHA Plan.
 Activities to be undertaken by the PHA in the coming year are consistent with the initiatives contained in the Consolidated Plan. (list below)

- Promote Redevelopment of blighted areas in West Belleville (Arlington Drive off S. 74th Street)
- Improve Public Housing stock through Capital Grants Fund

Other: (list below)

4. The Consolidated Plan of the jurisdiction supports the PHA Plan with the following actions and commitments: (describe below)

- Use of CDBG funds to address infrastructure needs of communities
- Administration of homebuyers assistance program for low and moderate income families
- Administration of employment training programs
- Homeless Prevention Program
- Utility Assistance and Emergency Housing Program

D. Other Information Required by HUD

Use this section to provide any additional information requested by HUD.

Attachments

IL030a01 - Admission and Continued Occupancy Policy
IL030b01 - Annual Statement Capital Fund Program – Part 1 – 501-05
Annual Statement Capital Fund Program – Part 2 – 501-05
Annual Statement Capital Fund Program – Part 3 – 501-05
IL030c01 - Five Year Action Plan – Part 1
Five Year Action Plan – Part 2
IL030d01 - Resident Advisory Board Membership Roster
IL030e01 - Conversion Analysis
IL030f01 - Public Housing Asset Management Table
IL030g01 - Response to Resident Comments Received (Public Hearing Minutes)
IL030h01 - Community Service Policy
IL030i01 - Deconcentration Policy
IL030j01 - Resident Advisory Board Meeting Minutes
IL030k01 - Site Based Waiting List Breakdown/Narrative
IL030l01 - Designation Narrative
IL030m01 - Section 8 Homeownership Capacity Statement
IL030n01 - Pet Policy
IL030o01 - Substantial Deviation Definition

Supporting Documentation

P & E Report Form 52837 – Part 1 – 501-02
P & E Report Form 52837 – Part 2 – 501-02
P & E Report Form Capital Fund Program – Part 1 – 501-03
P & E Report Form Capital Fund Program – Part 2 – 501-03
P & E Report Form Capital Fund Program – Part 1 – 502-03
P & E Report Form Capital Fund Program – Part 2 – 502-03
P & E Report Form Capital Fund Program – Part 1 – 501-04
P & E Report Form Capital Fund Program – Part 2 – 501-04
Management Needs Assessment
Management Improvement 5-Year Projections
Public Housing Flat Rent Schedule
Section 8 Administrative Plan
Annual Plan Status Report
Five Year Plan Status Report
Resident Survey Follow-up Plan
Public Hearing Minutes
Utility Allowance Schedule

PHA Plan Table Library

Component 7 Capital Fund Program Annual Statement Parts I, II, and II

Annual Statement Capital Fund Program (CFP) Part I: Summary

Capital Fund Grant Number FFY of Grant Approval: (MM/YYYY)

Original Annual Statement

Line No.	Summary by Development Account	Total Estimated Cost
1	Total Non-CGP Funds	
2	1406 Operations	
3	1408 Management Improvements	
4	1410 Administration	
5	1411 Audit	
6	1415 Liquidated Damages	
7	1430 Fees and Costs	
8	1440 Site Acquisition	
9	1450 Site Improvement	
10	1460 Dwelling Structures	
11	1465.1 Dwelling Equipment-Nonexpendable	
12	1470 Nondwelling Structures	
13	1475 Nondwelling Equipment	
14	1485 Demolition	
15	1490 Replacement Reserve	
16	1492 Moving to Work Demonstration	
17	1495.1 Relocation Costs	
18	1498 Mod Used for Development	
19	1502 Contingency	

20	Amount of Annual Grant (Sum of lines 2-19)	
21	Amount of line 20 Related to LBP Activities	
22	Amount of line 20 Related to Section 504 Compliance	
23	Amount of line 20 Related to Security	
24	Amount of line 20 Related to Energy Conservation Measures	

Annual Statement

Capital Fund Program (CFP) Part II: Supporting Table

Development Number/Name HA-Wide Activities	General Description of Major Work Categories	Development Account Number	Total Estimated Cost

Annual Statement

Capital Fund Program (CFP) Part III: Implementation Schedule

Development Number/Name HA-Wide Activities	All Funds Obligated (Quarter Ending Date)	All Funds Expended (Quarter Ending Date)

Optional Table for 5-Year Action Plan for Capital Fund (Component 7)

Complete one table for each development in which work is planned in the next 5 PHA fiscal years. Complete a table for any PHA-wide physical or management improvements planned in the next 5 PHA fiscal year. Copy this table as many times as necessary. Note: PHAs need not include information from Year One of the 5-Year cycle, because this information is included in the Capital Fund Program Annual Statement.

Optional 5-Year Action Plan Tables				
Development Number	Development Name (or indicate PHA wide)	Number Vacant Units	% Vacancies in Development	
Description of Needed Physical Improvements or Management Improvements			Estimated Cost	Planned Start Date (HA Fiscal Year)
Total estimated cost over next 5 years				

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ADMISSIONS AND CONTINUED OCCUPANCY POLICY

This Admissions and Continued Occupancy Policy defines the St. Clair County Housing Authority's policies for the operation for the Public Housing Program, incorporating Federal, State and local law. If there is any conflict between this policy and laws or regulations, the laws and regulations will prevail.

1.0 FAIR HOUSING

It is the policy of the St. Clair County Housing Authority to fully comply with all Federal, State and local nondiscrimination laws; the Americans with Disabilities Act; and the U. S. Department of Housing and Urban Development regulations governing Fair Housing and Equal Opportunity.

No person shall, on the grounds of race, color, sex, religion, national or ethnic origin, familial status, or disability be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under the St. Clair County Housing Authority's programs.

To further its commitment to full compliance with applicable Civil Rights laws, the St. Clair County Housing Authority will provide Federal/State/local information to applicants/residents of the Public Housing Program regarding discrimination and any recourse available to them if they believe they may be victims of discrimination. Such information will be made available with the application, and all applicable Fair Housing Information and Discrimination Complaint Forms will be made available at the St. Clair County Housing Authority office. In addition, all written information and advertisements will contain the appropriate Equal Opportunity language and logo.

The St. Clair County Housing Authority will assist any family that believes they have suffered illegal discrimination by providing them copies of the appropriate housing discrimination forms. The St. Clair County Housing Authority will also assist them in completing the forms if requested, and will provide them with the address of the nearest HUD office of Fair Housing and Equal Opportunity.

2.0 REASONABLE ACCOMODATION

Sometimes people with disabilities may need a reasonable accommodation in order to take full advantage of the St. Clair County Housing Authority housing programs and related services. When such accommodations are granted, they do not confer special treatment or advantage for the person with a disability; rather, they make the program accessible to them in a way that would otherwise not be possible due to their disability. This policy clarifies how people can request accommodations and the guidelines the St. Clair County Housing Authority will follow in determining whether it is reasonable to

provide a requested accommodation. Because disabilities are not always apparent, the St. Clair County Housing Authority will ensure that all applicants/residents are aware of the opportunity to request reasonable accommodations.

2.1 COMMUNICATION

Anyone requesting an application will also receive a Request for Reasonable Accommodation form.

Notifications of reexamination, inspection, appointment, or eviction will include information about requesting a reasonable accommodation. Any notification requesting action by the resident will include information about requesting a reasonable accommodation.

All decisions granting or denying requests for reasonable accommodations will be in writing.

2.2 QUESTIONS TO ASK IN GRANTING THE ACOMMODATION

A. Is the requestor a person with disabilities? For this purpose the definition of person with disabilities is different than the definition used for admission. The Fair Housig definition used for this purpose is:

A person with a physical or mental impairment that substantially limits one or more major life activities, has a record of such an impairment, or is regarded as having such an impairment. (The disability may not be apparent to others, i.e., a heart condition).

If the disability is apparent or already documented, the answer to this question is yes. It is possible that the disability for which the accommodation is being requested is a disability other than the apparent disability. If the disability is not apparent or documented, the St. Clair County Housing Authority will obtain verification that the person is a person with a disability.

B. Is the requested accommodation related to the disability? If it is apparent that the request is related to the apparent or documented disability, the answer to this question is yes. If it is not apparent, the St. Clair County Housing Authority will obtain documentation that the requested accommodation is needed due to the disability. The St. Clair County Housing Authority will not inquire as to the nature of the disability.

C. Is the requested accommodation reasonable? In order to be determined reasonable, the accommodation must meet two criteria:

1. Would the accommodation constitute a fundamental alteration? The St.

Clair County Housing Authority's business is housing. If the request would alter the fundamental business that the St. Clair County Housing Authority conducts, that would not be reasonable. For instance, the St. Clair County Housing Authority would deny a request to have the St. Clair County Housing Authority do grocery shopping for a person with disabilities.

2. Would the requested accommodation create an undue financial hardship or administrative burden? Frequently the requested accommodation costs little or nothing. If the cost would be an undue burden, the St. Clair County Housing Authority may request a meeting with the individual to investigate and consider equally effective alternatives.

- D. Generally the individual knows best what it is they need; however, the St. Clair County Housing Authority retains the right to be shown how the requested accommodation enables the individual to access or use the St. Clair County Housing Authority's programs or services.

If more than one accommodation is equally effective in providing access to the St. Clair County Housing Authority's programs and services, the St. Clair County Housing Authority retains the right to select the most efficient or economic choice.

The cost necessary to carry out approved requests, including requests for physical modifications, will be borne by the St. Clair County Housing Authority if there is no one else willing to pay for the modifications. If another party pays for the modification, the St. Clair County Housing Authority will seek to have the same entity pay for any restoration costs.

If the resident requests as a reasonable accommodation that they be permitted to make physical modifications at their own expense, the St. Clair County Housing Authority will generally approve such request if it does not violate codes or affect the structural integrity of the unit.

Any request for an accommodation that would enable a resident to materially violate essential lease terms will not be approved, i.e. allowing nonpayment of rent, destruction of property, disturbing the peaceful enjoyment of others, etc.

3.0 SERVICES FOR NON-ENGLISH SPEAKING APPLICANTS AND RESIDENTS

The St. Clair County Housing Authority will endeavor to have bilingual staff or access to people who speak languages other than English in order to assist non-English speaking families.

4.0 FAMILY OUTREACH

The St. Clair County Housing Authority will publicize the availability and nature of the Public Housing Program for extremely low-income, very low and low-income families in a newspaper of general circulation, minority media, and by other suitable means.

To reach people who cannot or do not read the newspapers, the St. Clair County Housing Authority will distribute fact sheets to the broadcasting media and initiate personal contacts with members of the news media and community service personnel. The St. Clair County Housing Authority will also try to utilize public service announcements.

The St. Clair County Housing Authority will communicate the status of housing availability to other service providers in the community and inform them of housing eligibility factors and guidelines so they can make proper referrals for the Public Housing Program.

5.0 RIGHT TO PRIVACY

All adult members of both applicant and resident households are required to sign HUD Form 9886, Authorization for Release of Information and Privacy Act Notice. The Authorization for Release of Information and Privacy Act Notice states how family information will be released and includes the Federal Privacy Act Statement.

Any request for applicant or resident information will not be released unless there is a signed release of information request from the applicant or resident.

6.0 REQUIRED POSTINGS

In each of its offices, the St. Clair County Housing Authority will post, in a conspicuous place and at a height easily read by all persons including persons with mobility disabilities, the following information:

- A. Statement of Policies and Procedures governing Admission and Continued Occupancy
- B. Notice of the status of the waiting list (opened or closed)
- C. A listing of all the developments by name, address, number of units, units designed with special accommodations, address of all project offices, office hours, telephone numbers, TDD numbers, and Resident Facilities and operation hours
- D. Income Limits for Admission

- E. Utility Allowance Schedule
- F. Current Schedule of Routine Maintenance Charges And Service Charge Policy
- G. Dwelling Lease
- H. Grievance Procedure
- I. Fair Housing Poster
- J. Equal Opportunity in Employment Poster
- K. Any current St. Clair County Housing Authority Notices

7.0 TAKING APPLICATIONS

Families wishing to apply for the Public Housing Program will be required to complete an application for housing assistance. Applications may be made in person:

St. Clair County Housing Authority
1790 S. 74th Street
Belleville, IL 62223

Applications are taken to compile a waiting list. Due to the demand for housing in the St. Clair County Housing Authority jurisdiction, the St. Clair County Housing Authority may take applications on an open enrollment basis, depending on the length of the waiting list.

To be accepted, applications must be fully complete and include proof of address (i.e. occupancy permit, utility bill, lease agreement, etc.).

Applications will be mailed to interested families upon request.

The completed application will be dated and time stamped upon its return to the St. Clair County Housing Authority.

Persons with disabilities who require a reasonable accommodation in completing an application may call the St. Clair County Housing Authority to make special arrangements. A Telecommunication Device for the Deaf (TDD) is available for the deaf. The TDD telephone number is 618-277-3290.

The application process will involve two phases. The first phase is the initial application for housing assistance or the pre-application. The pre-application requires the family to provide limited basic information establishing any preferences to which they may be entitled. This first phase results in the family's placement on the waiting list.

Upon receipt of the family's pre-application, the St. Clair County Housing Authority will make a preliminary determination of eligibility. The St. Clair County Housing Authority will notify the family in writing of the date and time of placement on the waiting list, and the approximate wait before housing may be offered. If the St. Clair County Housing Authority determines the family to be ineligible, the notice will state the reasons therefore and will offer the family the opportunity of an informal review of the determination.

The applicant may at any time report changes in their applicant status including changes in family composition, income, or preference factors. The St. Clair County Housing Authority will annotate the applicant's file and will update their place on the waiting list. Confirmation of the changes will be confirmed with the family in writing.

The second phase is the final determination of eligibility, referred to as the full application. The full application takes place when the family nears the top of the waiting list. The St. Clair County Housing Authority will ensure that verification of all preferences, eligibility, suitability and selection factors are current in order to determine the family's final eligibility for admission into the Public Housing Program.

8.0 ELIGIBILITY FOR ADMISSION

8.1 INTRODUCTION

There are five eligibility requirements for admission to public housing:

- A) qualifies as a family
- B) has an income within the income limits;
- C) meets citizenship/eligible immigrant criteria;
- D) provides documentation of Social Security numbers;
- E) and signs consent authorization documents.

In addition to the eligibility criteria, families must also meet the St. Clair County Housing Authority screening criteria in order to be admitted to public housing.

8.2 ELIGIBILITY CRITERIA

A. Family status.

1. **A family with or without children.** Such a family is defined as a group of people related by blood, marriage, adoption or affinity that live together in a stable family relationship.
 - a. Children temporarily absent from the home due to placement in foster care are considered family members.

- b. Unborn children and children in the process of being adopted are considered family members for the purpose of determining bedroom size but are not considered family members for determining income limit.
2. An **elderly family**, which is:
- a. A family whose head, spouse, or sole member is a person who is at least 62 years of age;
 - b. Two or more persons who are at least 62 years of age living together; or
 - c. One or more persons who are at least 62 years of age living with one or more live-in aides.
3. A **near elderly family**, which is:
- a. A family whose head, spouse, or sole member is a person who is at least 50 years of age but below the age of 62;
 - b. Two or more persons, who are at least 50 years of age but below the age of 62, living together; or
 - c. One or more persons, who are at least 50 years of age but below the age of 62, living with one or more live-in aides.
4. A **disabled family**, which is:
- a. A family whose head, spouse, or sole member is a person with disabilities;
 - b. Two or more persons with disabilities living together; or
 - c. One or more persons with disabilities living with one or more live-in aides.
5. A **displaced family**, which is a family in which each member, or whose sole member, has been displaced by governmental action, or whose dwelling has been extensively damaged or destroyed as a result of a disaster declared or otherwise formally recognized pursuant to Federal disaster relief laws.
6. A **remaining member of a resident family**.
7. A **single person** who is not an elderly or displaced person, a person with

disabilities, or the remaining member of a resident family.

B. Income eligibility

1. The St. Clair County Housing Authority shall follow the statutory requirement that at least 40% of newly admitted families in any fiscal year be families whose annual income is at or below 30% of the area median income.
2. Income limits apply only at admission and are not applicable for continued occupancy.
3. A family may not be admitted to the public housing program from another assisted housing program (e.g., resident-based Section 8) or from a public housing program operated by another housing authority without meeting the income requirements of the St. Clair County Housing Authority.
4. If the St. Clair County Housing Authority acquires a property for federal public housing purposes, the families living there must have incomes within the low-income limit in order to be eligible to remain as public housing residents.
5. Income limit restrictions do not apply to families transferring within our Public Housing Program.

C. Citizenship/Eligibility Status

1. To be eligible each member of the family must be a citizen, national, or a noncitizen who has eligible immigration status under one of the categories set forth in Section 214 of the Housing and Community Development Act of 1980 (see 42 U.S.C. 1436a(a)).
2. Family eligibility for assistance.
 - a. A family shall not be eligible for assistance unless every member of the family residing in the unit is determined to have eligible status, with the exception noted below.
 - b. Despite the ineligibility of one or more family members, a mixed family may be eligible for one of three types of assistance. (See Section 13.6 for calculating rents under the noncitizen rule)
 - c. A family without any eligible members and receiving assistance on June 19, 1995 may be eligible for temporary deferral of termination of assistance.

D. Social Security Number Documentation

To be eligible, all family members 6 years of age and older must provide a Social Security number or certify that they do not have one.

E. Signing Consent Forms

1. In order to be eligible, each member of the family who is at least 18 years of age, and each family head and spouse regardless of age, shall sign one or more consent forms.
2. The consent form must contain, at a minimum, the following:
 - a. A provision authorizing HUD or the St. Clair County Housing Authority to obtain from State Wage Information Collection Agencies (SWICAs) any information or materials necessary to complete or verify the application for participation or for eligibility for continued occupancy; and
 - b. A provision authorizing HUD or the St. Clair County Housing Authority to verify with previous or current employers income information pertinent to the family's eligibility for or level of assistance;
 - c. A provision authorizing HUD to request income information from the IRS and the SSA for the sole purpose of verifying income information pertinent to the family's eligibility or level of benefits; and
 - d. A statement that the authorization to release the information requested by the consent form expires 15 months after the date the consent form is signed.

8.3 SUITABILITY

- A. Applicant families will be evaluated to determine whether, based on their recent behavior, such behavior could reasonably be expected to result in noncompliance with the public housing lease. The St. Clair County Housing Authority will look at past conduct as an indicator of future conduct. Emphasis will be placed on whether a family's admission could reasonably be expected to have a detrimental effect on the development environment, other residents, St. Clair County Housing Authority employees, or other people residing in the immediate vicinity of the property. Otherwise eligible families will be denied admission if they fail to meet the suitability criteria.
- B. The St. Clair County Housing Authority will consider objective and reasonable

aspects of the family's background, including the following:

1. History of meeting financial obligations, especially rent;
 2. Ability to maintain (or with assistance would have the ability to maintain) their housing in a decent and safe condition based on living or housekeeping habits and whether such habits could adversely affect the health, safety, or welfare of other residents;
 3. History of criminal activity by any household member involving crimes of physical violence against persons or property and any other criminal activity including drug-related criminal activity that would adversely affect the health, safety, or well being of other residents or staff or cause damage to the property;
 4. History of disturbing neighbors or destruction of property;
 5. Having committed fraud in connection with any Federal housing assistance program, including the intentional misrepresentation of information related to their housing application or benefits derived there from; and
 6. History of abusing alcohol in a way that may interfere with the health, safety, or right to peaceful enjoyment by others.
- C. The St. Clair County Housing Authority will ask applicants to provide information demonstrating their ability to comply with the essential elements of the lease. The St. Clair County Housing Authority will verify the information provided. Such verification may include but may not be limited to the following:
1. A credit check of the head, spouse and co-head, and any family member age 18 and over;
 2. A rental history check of all adult family members;
 3. A criminal background check on all adult household members, including live-in aides. This check will be made through State or local law enforcement or court records in those cases where the household member has lived in the local jurisdiction for the last three years. Where the individual has lived outside the local area, the St. Clair County Housing Authority may contact law enforcement agencies where the individual had lived or request a check through the FBI's National Crime Information Center (NCIC);
 4. A home visit. The home visit provides the opportunity for the family to demonstrate their ability to maintain their home in a safe and sanitary

manner. This inspection considers cleanliness and care of rooms, appliances, and appurtenances. The inspection may also consider any evidence of criminal activity; and

5. A check of the State's lifetime sex offender registration program for each adult household member, including live-in aides. No individual registered with this program will be admitted to public housing.
6. A check with local and state agencies and/or social service providers currently or previously involved with the household.

8.4 GROUNDINGS FOR DENIAL

The St. Clair County Housing Authority is not required or obligated to assist applicants who:

- A. Do not meet any one or more of the eligibility criteria;
- B. Do not supply information or documentation required by the application process;
- C. Have failed to respond to a written request for information or a request to declare their continued interest in the program;
- D. Have a history of not meeting financial obligations, especially rent;
- E. Do not have the ability to maintain (with assistance) their housing in a decent and safe condition where such habits could adversely affect the health, safety, or welfare of other residents;
- F. Have a history of criminal activity by any household member involving crimes of physical violence against persons or property and any other criminal activity including drug-related criminal activity that would adversely affect the health, safety, or well being of other residents or staff or cause damage to the property;
- G. Have a history of disturbing neighbors or destruction of property;
- H. Currently owes rent or other amounts to any housing authority or other provider of federally assisted housing in connection with their public housing, Section 8 or similar programs;
- I. Have committed fraud, bribery or any other corruption in connection with any Federal housing assistance program, including the intentional misrepresentation of information related to their housing application or benefits derived there from;

- J. Were evicted from assisted housing within three years of the projected date of admission because of drug-related criminal activity involving the personal use or possession for personal use;
- K. Were evicted from assisted housing within five years of the projected date of admission because of drug-related criminal activity involving the illegal manufacture, sale, distribution, or possession with the intent to manufacture, sell, distribute a controlled substance as defined in Section 102 of the Controlled Substances Act, 21 U.S.C. 802;
- L. Are illegally using a controlled substance or are abusing alcohol in a way that may interfere with the health, safety, or right to peaceful enjoyment of the premises by other residents. The St. Clair County Housing Authority may waive this requirement if:
 - 1. The person demonstrates to the St. Clair County Housing Authority's satisfaction that the person is no longer engaging in drug-related criminal activity or abuse of alcohol;
 - 2. Has successfully completed a supervised drug or alcohol rehabilitation program;
 - 3. Has otherwise been rehabilitated successfully; or
 - 4. Is participating in a supervised drug or alcohol rehabilitation program.
- M. Have engaged in or threatened abusive or violent behavior towards any St. Clair County Housing Authority staff or residents;
- N. Have a household member who has ever been evicted from public housing;
- O. Have a family household member who has been terminated under the certificate or voucher program;
- P. **Denied for Life:** If any family member has been convicted of manufacturing or producing methamphetamine (speed);
- Q. **Denied for Life:** Has a lifetime registration under a State sex offender registration program.

8.5 *INFORMAL REVIEW*

- A. If the St. Clair County Housing Authority determines that an applicant does not meet the criteria for receiving public housing assistance, the St. Clair County Housing Authority will promptly provide the applicant with written notice of the determination. The notice must contain a brief statement of the reason(s) for the

decision and state that the applicant may request an informal review of the decision within 10 business days of the denial. The St. Clair County Housing Authority will describe how to obtain the informal review.

The informal review may be conducted by any person designated by the St. Clair County Housing Authority, other than a person who made or approved the decision under review or subordinate of this person. The applicant must be given the opportunity to present written or oral objections to the St. Clair County Housing Authority's decision. The St. Clair County Housing Authority must notify the applicant of the final decision within 14 calendar days after the informal review (or upon receipt of documentation/information requested at the informal hearing) including a brief statement of the reasons for the final decision.

- B. The participant family may request that the St. Clair County Housing Authority provide for an Informal Hearing after the family has notification of an INS decision on their citizenship status on appeal, or in lieu of request of appeal to the INS. This request must be made by the participant family within 30 days of receipt of the Notice of Denial or Termination of Assistance, or within 30 days of receipt of the INS appeal decision.

For the participant families, the Informal Hearing Process above will be utilized with the exception that the participant family will have up to 30 days of receipt of the Notice of Denial or Termination of Assistance, or of the INS appeal decision.

9.0 MANAGING THE WAITING LIST

9.1 *OPENING AND CLOSING THE WAITING LIST*

Opening of the waiting list will be announced with a public notice stating that applications for public housing will again be accepted. The public notice will state where, when, and how to apply. The notice will be published in a local newspaper of general circulation and also by any available minority media. The public notice will state any limitations to who may apply.

The notice will state that applicants already on waiting lists for other housing programs must apply separately for this program and such applicants will not lose their place on other waiting lists when they apply for public housing. The notice will include the Fair Housing logo and slogan and will be in compliance with Fair Housing requirements.

Closing of the waiting list will also be announced with a public notice. The public notice will state the date the waiting list will be closed and for what bedroom sizes. The public notice will be published in a local newspaper of general circulation and also by any available minority media.

9.2 ORGANIZATION OF THE WAITING LIST

A. Site-Based Waiting List Plan

In an effort to improve efficiency and better serve households interested in public housing, the St. Clair County Housing Authority (SCCHA) adopted a site-based waiting list in conjunction with the start of the new fiscal year, July 1, 2003.

Prior practice was to maintain the waiting list on a countywide basis, providing applicants with up to three unit offers before removing them from the waiting list for failure to accept a unit. Given the geographical diversity of SCCHA's public housing inventory, the countywide waiting list has resulted in gross inefficiencies.

Allowing interested households to submit an application on a site-specific basis has improved service to applicants and increased staff efficiency.

SCCHA attests:

- That it is eligible to adopt site-based waiting lists in that it regularly submits required occupancy data to HUD's Multifamily Tenant Characteristics Systems (MTCS) in an accurate, complete and timely manner;
- The system of site-based waiting lists provides for full disclosure to each applicant of any option available to the applicant in the selection of the development in which to reside including basic information about available sites (location, occupancy, number and size of accessible units, amenities such as day care, security, transportation and training programs) 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 (e.g., regular or accessible) at each site;
- Adoption of site-based waiting lists would not violate any court order or settlement agreement, or be inconsistent with a pending complaint brought by HUD;
- SCCHA has included reasonable measures to assure that adoption of site-based waiting lists is consistent with affirmatively furthering fair housing, such as reasonable marketing activities to attract applicants regardless of race or ethnicity;
- SCCHA has provided for review of its site-based waiting list policy to determine if the policy is consistent with civil rights laws and certifications through the following steps;

SCCHA shall as part of the submission of the Annual Plan assess changes in racial, ethnic or disability-related tenant composition at each site that may have occurred during the implementation of the site-based waiting list, based upon MTCS occupancy data that has been confirmed to be complete and accurate by an independent audit (which may be the annual independent audit) or is otherwise satisfactory to HUD;

At least every three years, SCCHA shall use independent testers or other means satisfactory to HUD, to assure that the site-based waiting list is not being implemented in a discriminatory manner, and that no patterns or practices of discrimination exist, and providing the results to HUD.

SCCHA shall take any steps necessary to remedy the problems surfaced during the review; and

SCCHA shall take the steps necessary to affirmatively further fair housing.

Significant procedural matters related to the initial implementation and continued administration of the site-based waiting lists are summarized below:

- Eighteen separate public housing waiting lists shall be maintained, as listed below:

Hawthorne Terrace, Alorton
Thomas Terry Apts., Brooklyn
Amber Court, Belleville
Bel-Plaza I (114 S. Church St.), Belleville
Bel-Plaza II (115 N. 47th St.), Belleville
Ernest Smith Sr. Apts., Centreville
Adeline James Building, Centreville
Private Mathison Manor, Centreville
Bluffside Apartments, Dupo
Scattered Sites, Lebanon
Lakeview Apts., Lenzburg
Heritage Manor, Millstadt
Clayton Manor, Marissa
Jefferson Square, O'Fallon
Becker Park and Rickert Station, New Athens
Smithton Apts., Smithton
Fullerton Road, Swansea
Scattered Sites, Washington Park

- Applicants can choose to be on as many waiting lists as they desire.

- Applicants who cannot attend a briefing session (the initial step in the screening process) may remain on the waiting list provided they contact the staff and have “good cause” (as determined by staff) for not attending. Failure to attend a subsequent briefing, regardless of cause, shall result in the applicant’s removal from the waiting list.
- Once an applicant is approved for housing for a particular location, they can with good cause (as determined by SCCHA) decline one unit offer. Upon a second “good cause” or the first “without cause” declination, the application shall be withdrawn from the waiting list.
- Any applicant removed from a waiting list shall not be eligible to re-apply for the same location for a period of six months from the withdrawn date, with the exception being when there are no other applications of the appropriate unit size for the location.
- Notices returned to SCCHA by the postal service because the notice was undeliverable for any other than SCCHA error in addressing the notice (i.e. insufficient address, applicant moved, etc.), shall result in the applicant being removed **from all waiting lists**. An applicant can be reinstated to the waiting list(s) at anytime upon contacting SCCHA, with their application being assigned a new date and time.
- Once an applicant accepts a federally subsidized unit operated by SCCHA, the applicant shall be removed from all other waiting lists for properties operated by SCCHA (this does not include the Section 8 Housing Choice Voucher Program).

Excepting the aforementioned provisions, there shall be no other changes in the existing application and waiting list administration procedures.

B. Unit Type/Bedroom Categories

SCCHA shall organize the waiting list by the following bedroom categories:

Elderly (as defined in 8.2, A, 2)

- Efficiency
- 1 Bedroom
- 2 Bedroom

Family (as defined in 8.2, A, 1)

- 1 Bedroom
- 2 Bedroom
- 3 Bedroom
- 4 Bedroom
- 5 Bedroom

C. Applicants with Disabilities

Within each bedroom category listed above, the waiting list will be maintained to reflect the type of disability possessed by the applicant, if any, as it relates to their special needs:

W = Wheelchair user
M = Mobility Impaired
V = Vision Impaired
H = Hearing Impaired
O = Other

Persons under age 62 with a disability shall be placed on Family Waiting Lists with the nature of their disability noted.

D. Order of Selection

The waiting list will be computer generated according to the following hierarchical order.

- a) *Unit Category (Elderly/Family) and bedroom size needed by applicants according to occupancy standard;*
- b) *Total number of Preference Points;*
- c) *Date and time of application or reinstatement.*

NOTE: When a unit becomes available that has been modified to accommodate a person with a disability that impacts their housing needs (i.e. wheelchair confined or mobility, vision, or hearing impaired), SCCHA shall select for screening in priority order from the waiting list generated in accordance with the three criteria listed above, applicants who have indicated on their preliminary application that they or a household member has a disability of that nature.

E. Maintaining the Waiting List

After the preliminary eligibility determination has been made, applicants are placed on the appropriate waiting list in order of preference. SCCHA will maintain an accurate waiting list which conforms to HUD requirements.

The waiting list will contain at least the following information on apparently eligible households who have an active preapplication:

- a) *Name of head of household;*
- b) *Date and time the preapplication was received;*
- c) *Type and Number of Preference Points assigned.*

9.3 FAMILIES NEARING THE TOP OF THE WAITING LIST

When a family appears to be within three (3) months of being offered a unit, the family will be invited to a briefing and the verification process will begin. It is at this point in time that the family's waiting list preference will be verified. If the family no longer qualifies to be near the top of the list, the family's name will be returned to the appropriate spot on the waiting list. The St. Clair County Housing Authority must notify the family in writing of this determination and give the family the opportunity for an informal review.

Once the preference has been verified, the family will complete a full application, present Social Security number information, citizenship/eligible immigrant information, and sign the Consent for Release of Information forms.

9.4 PURGING THE WAITING LIST

SCCHA will periodically update the waiting list to ensure that it is current and accurate.

A letter will be mailed to the applicant's last known address, requesting information regarding their continued interest in maintaining a place on the waiting list.

If the applicant did not notify SCCHA of a move as required, SCCHA is not responsible for applicant's failure to receive the update request.

The request letter will include a deadline date by which applicants must notify SCCHA of their continued interest. If SCCHA does not receive the applicant's notice by the deadline date, the applicant's name will be removed from the waiting list. SCCHA is not responsible for mail delays. Should the applicant subsequently notify SCCHA of their current status, their application will be reinstated using the date they contacted SCCHA.

9.5 REMOVAL OF APPLICANTS FROM THE WAITING LIST

The St. Clair County Housing Authority will not remove an applicant's name from the waiting list unless:

- A. The applicant requests in writing that the name be removed;
- B. The applicant fails to respond to a written request for information or a request to declare their continued interest in the program; or
- C. The applicant does not meet either the eligibility or suitability criteria for the program.

9.6 MISSED APPOINTMENTS

All applicants who fail to keep a scheduled appointment with the St. Clair County Housing Authority will be sent a notice of termination of the process for eligibility.

The St. Clair County Housing Authority will allow the family to reschedule for good cause. Generally, no more than one opportunity will be given to reschedule without good cause, and no more than two opportunities will be given for good cause. When good cause exists for missing an appointment, the St. Clair County Housing Authority will work closely with the family to find a more suitable time. Applicants will be offered the right to an informal review before being removed from the waiting list.

9.7 NOTIFICATION OF NEGATIVE ACTIONS

Any applicant whose name is being removed from the waiting list will be notified by the St. Clair County Housing Authority, in writing, that they have ten (10) calendar days from the date of the written correspondence to present mitigating circumstances or request an informal review. The letter will also indicate that their name will be removed from the waiting list if they fail to respond within the timeframe specified. The St. Clair County Housing Authority system of removing applicant names from the waiting list will not violate the rights of persons with disabilities. If an applicant claims that their failure to respond to a request for information or updates was caused by a disability, the St. Clair County Housing Authority will verify that there is in fact a disability and the disability caused the failure to respond, and provide a reasonable accommodation. An example of a reasonable accommodation would be to reinstate the applicant on the waiting list based on the date and time of the original application.

10.0 RESIDENT SELECTION AND ASSIGNMENT PLAN

10.1 PREFERENCES

The St. Clair County Housing Authority will select families based on the following preferences within each bedroom size category:

- A. Ranking Preferences – used to determine rank order of applications among the group of applicants qualifying for routine admission (as opposed to local preferences).
 - a) **Jurisdictional – 10 points**
Applicants who live or work in SCCHA's jurisdiction (i.e. all of St. Clair County, excluding the City of East St. Louis).
 - b) **Veteran Status – 1 point**
Applicants who are a Veteran or survivor of a Veteran who actively served in a branch of the United States Armed Services. The term Survivor includes the spouse or widow (Unless remarried) of a veteran.

- c) ***Earned Income or Education/Training Program – 2 points***
*Applicant households in which the Head of Household and/or Spouse has an earned income source. * An applicant household shall be given the benefit of preference if the head and spouse, or sole member, are age 62 or older, or are receiving any payments based on their inability to work (i.e. SS Disability, SSI, etc.)*

Awarded to applicants with verifiable earnings from employment/self employment continuing over minimum 30-day period with gross earnings of at least \$300 or applicant enrolled in educational/training program.

- d) ***Excessive Shelter Costs or Unstable Housing – 1 point***
Excessive shelter costs is defined as situations when the applicant is paying 50% or more of their gross monthly income for rent and utilities, with the utilities being based upon the Section 8 Program’s Utility Allowance Schedule for the appropriate bedroom size. To be considered “rent” the applicants name must appear on the lease agreement and/or occupancy permit, if applicable.

Unstable housing situations include being overcrowded, displacement, substandard housing, homelessness, lack of permanent housing (i.e. temporarily living with family and/or friends), victim of domestic abuse, and families needing to relocate as a result of their cooperation with law enforcement in criminal investigations (i.e. witness protection purposes). The unstable housing situation must be verified in writing by a community service agency/organization, elected or public official, or other official acting in his/her professional capacity (such as an ordained minister). Letters from private citizens shall not be accepted.

- B. **Local Preferences** – used to determine rank order of applicants among the group of applicants screened based solely on local preference (regardless of their eligibility for a ranking preference).

- a) ***Inter-Program Transfers/Accommodations – 7 points – Applied as described below:***

i) Transfers (i.e. Between Public Housing, Section 8 Existing, Moderate Rehab and other federally assisted properties owned /managed by SCCHA and/or other PHAs/Owners due to identifiable need that can not be adequately accommodated within the constraints of the program under which the participant is currently being assisted or other circumstances approved by the Executive Director.

ii) Admissions to accommodate referrals from the Department of Children and Family Services (DCFS) and other agencies. Awarding of these

points shall be considered on a case-by-case basis upon the written request of the agency/organization, with SCCHA retaining the sole discretion to award the preference points to any particular application. Admissions under this provision shall be limited to no more than 5% of annual admissions.

- b) **Law Enforcement Officials/Teachers – 6 points**
Given to full-time law enforcement personnel and/or teachers to encourage residency in public housing.
- c) **Hard-To-Lease Location – 5 points**
(awarded to applicants willing to accept a unit in Marissa, Lenzberg, New Athens, the Adeline James Building in Centreville, or other areas as designated by the Executive Director)
- d) **Local Disaster Victim – 5 points**
These preference points shall only be granted when a recognized disaster occurs within St. Clair County Housing Authority’s jurisdictional boundaries as designated by St. Clair County Housing Authority’s Executive Director.

10.2 ASSIGNMENT OF BEDROOM SIZES

The following guidelines will determine each family’s unit size without overcrowding or over-housing:

Number of Bedrooms	Number of Persons	
	Minimum	Maximum
0	1	1
1	1	2
2	2	4
3	3	6
4	4	8
5	5	10

These standards are based on the assumption that each bedroom will accommodate no more than two (2) persons. Zero bedroom units will only be assigned to one-person families.

Dwelling units will be assigned so that persons of different generations, persons of the opposite sex (other than husband and wife or cohabiting individuals and small children under the age of 10) and unrelated adults will not occupy the same bedroom.

In determining bedroom size, the St. Clair County Housing Authority will include the presence of children to be born to a pregnant woman, children who are in the process of being adopted, children whose custody is being obtained, children who are temporarily away at school, or children who are temporarily in foster-care.

In addition, the following considerations may be taken in determining bedroom size:

- A. Children of the same sex may share a bedroom.
- B. Children of the opposite sex, both under the age of 10 will share a bedroom.
- C. Adults and children will not be required to share a bedroom.
- D. Foster – adults and/or foster - children will not be required to share a bedroom with family members (but SCCHA is under no obligation to transfer a family to accommodate newly placed foster children).
- E. Dwelling units will also be assigned as not to require use of the living room for sleeping purposes.

Exceptions to normal bedroom size standards include the following:

- A. Units smaller than assigned through the above guidelines – A family may request a smaller unit size than the guidelines allow. The St. Clair County Housing Authority will allow the smaller size unit so long as generally no more than two (2) people per bedroom are assigned. In such situations, the family will sign a certification stating they understand they will be ineligible for a larger size unit for 3 years unless necessitated sooner by subsequent changes in family composition.
- B. Units larger than assigned through the above guidelines – A family may request a larger unit size than the guidelines allow. The St. Clair County Housing Authority will allow the larger size unit if the family provides a verified medical need that the family be housed in a larger unit.
- C. If there are no families on the waiting list for a larger size, smaller families may be housed if they sign a release form stating they will transfer (at the family's own expense) to the appropriate size unit when an eligible family needing the larger unit applies. The family transferring will be given a 30-day notice before being required to move.

- D. Larger units may be offered in order to improve the marketing of a development suffering a high vacancy rate.

10.3 ANNUAL ADMISSIONS

A) Statutory Requirements

The St. Clair County Housing Authority shall follow the statutory requirement that at least 40% of newly admitted families in any fiscal year be families whose annual income is at or below 30% of the area median income. To insure this requirement is met we shall quarterly monitor the incomes of newly admitted families and the incomes of the families on the waiting list. If it appears that the requirement to house extremely low-income families will not be met, we will skip higher income families on the waiting list to reach extremely low-income families.

If there are not enough extremely low-income families on the waiting list we will conduct outreach on a non-discriminatory basis to attract extremely low-income families to reach the statutory requirement.

B) Local Criteria

The selection of eligible families will be completed so that at least 50% of the annual admissions will be applicants qualifying on the basis of a ranking preference and not more than 50% of the annual admissions will be applicants qualifying on the basis of local preferences.

10.4 DECONCENTRATION POLICY

It is St. Clair County Housing Authority's policy to provide for deconcentration 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 deconcentration incentives to implement. The worksheet for the analysis can be found in **Appendix D**.

10.5 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 deconcentration 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.

10.6 SCREENING PROCESS

a) *Briefing Session*

Upon selection from the waiting list, generally in groups of 20-50, applicants are scheduled to attend a group “briefing” session. The briefing session is designed to acquaint the applicants with the Public Housing Program, ensure their continued interest, and to initiate the process of determining eligibility.

b) *Files In Process*

All applicants being screened remain “In Process” until the preliminary determination regarding eligibility is made in accordance with the criteria established in Section 8 of this document. Files categorized as “In Process” are not considered for unit offers. Eligibility determinations are made promptly upon receipt of all needed information/documentation. SCCHA is not responsible for applicants’ delay in submitting required information/documentation.

c) *Conditionally Approved Applicants*

Applicants determined preliminarily eligible are listed on the “Conditionally Approved List” (CAA) by bedroom size/category, preference points, date/time of application. The CAA, which is updated on a regular basis, is used by staff to make conditional offers to applicants.

10.7 OFFER OF A UNIT

When making offers to fill vacancies (actual or anticipated) the St. Clair County Housing Authority will contact the first family on the waiting list (CAA) who has the highest priority for this type of unit or development and whose income category would help to meet the deconcentration goal and/or the income targeting goal.

The St. Clair County Housing Authority will contact the family first by telephone to make the unit offer. If the family cannot be reached by telephone, the family will be notified of a unit offer via first class mail. The family will be given five (5) business days

from the date the letter was mailed to contact the St. Clair County Housing Authority regarding the offer.

The family will be offered the opportunity to view the unit, provided they are available on a timely basis. After having the opportunity to view the unit, the family will have two (2) business days to accept or reject the unit. This verbal offer and the family's decision must be documented in the resident file. If the family rejects the offer of the unit, the St. Clair County Housing Authority will send the family a letter documenting the offer and the rejection.

10.8 REJECTION OF UNIT

If in making the offer to the family the St. Clair County Housing Authority skipped over other families on the waiting list in order to meet their deconcentration goal or offered the family any other deconcentration incentive and the family rejects the unit, the family will not lose their place on the waiting list and will not be otherwise penalized.

If the St. Clair County Housing Authority did not skip over other families on the waiting list to reach this family, did not offer any other deconcentration incentive, and the family rejects the unit without good cause, the family will be given a rejection. Upon the third "without cause" rejection the family will be returned to the waiting list, keeping their preferences, but the date and time of application will be changed to the date and time the third unit was rejected.

If the family rejects with good cause any unit offered, they will not lose their place on the waiting list. Good cause includes reasons related to health, proximity to work, school, and childcare (for those working or going to school). The family will be offered the right to an informal review of the decision to alter their application status.

10.9 ACCEPTANCE OF UNIT

Upon an applicant's acceptance of a conditional offer, the applicant file is subject to review by the Property Manager and/or the Resident Council Screening Committee (RCSC), when applicable.

Review By Property Manager and/or Resident Council Screening Committee

All adult members (age 18 and over) of the applicant family must meet with the Property Manager and attend an interview with the RCSC with jurisdiction over the development. The purposes of the review and interview are:

- 1) It offers the potential for providing SCCHA with previously unobtained or unavailable information that may provide a legitimate basis for rejecting an undesirable applicant;

- 2) It gives the RCSC the opportunity to meet all new residents, inform the prospective resident of neighborhood values and expectations, acquaint the applicant with the RC's activities, and recruit new members.

Applicants that receive a favorable determination from the PM and RCSC are given final approval for occupancy. If either the PM or RCSC recommend rejection, the file is reviewed by the Management Director to determine if the rejection recommendation is consistent with established policy. Both the applicants and the RCSC have the opportunity to have the determination reviewed in accordance with the established Grievance Policy.

a) *Lease Execution and Orientations*

The family will be required to sign a lease that will become effective no later than three (3) business days after the date of acceptance or the business day after the day the unit becomes available, whichever is later.

Prior to or within 30 days of signing the lease all families (head of household) and other adult family members will be required to attend the Lease and Occupancy Orientation. The family will not be housed if they have not attended the orientation, unless management has waived the requirement. Applicants who provide prior notice of an inability to attend the orientation will be rescheduled. Failure of an applicant to attend the orientation, without good cause, may result in the cancellation of the occupancy process or lease termination (if housed).

The applicant will be provided a copy of the lease (including any addendum thereto), the grievance procedure, utility allowances, service charge policy, maintenance request procedures, collection policy, and a request for reasonable accommodation form. These documents will be explained in detail. The applicant will sign a certification that they have received these documents and that they have reviewed them with Housing Authority personnel. The certification will be filed in the resident's file.

The signing of the lease and the review of financial information are to be privately handled. The head of household and all adult family members will be required to execute the lease prior to admission. One executed copy of the lease will be furnished to the head of household and the St. Clair County Housing Authority will retain the original executed lease in the resident's file. A copy of the grievance procedure will be attached to the resident's copy of the lease.

b. *Security Deposits*

The family will pay a security deposit at the time of lease signing. The security deposit will be equal to:

- A. **Greater of \$200 or NTP (net tenant payment or one month's rent) for all apartments.**

B. The greater of \$300.00 or NTP for all single-family houses.

In exceptional situations, the St. Clair County Housing Authority reserves the right to allow a new resident to pay their security deposit in up to three (3) payments. One third shall be paid in advance, one-third with their second rent payment, and one-third with their third rent payment. This shall be at the sole discretion of the Housing Authority.

In the case of a move within public housing, the security deposit for the first unit will be transferred to the second unit. Additionally, if the security deposit for the second unit is greater than that for the first, the difference will be collected from the family. Once collected, the security deposit or portion thereof shall not be refunded until the family vacates, and then is subject to applicable charges.

In the event there are costs attributable to the family for bringing the first unit into condition for re-renting, the family shall be billed for these charges.

The Security Deposit required from families in occupancy may be increased based upon documented damage to the premises and/or an established pattern of poor housekeeping and property damage. The Security Deposit required shall not exceed 150% of the Section 8 Fair Market Rent limit for the unit size.

The security deposit required of families upon move-in may be increased above the amounts listed herein if it is determined that the family is “high risk” based upon pertinent screening factors (i.e. lack of previous or unsuccessful prior rental experience, poor credit, etc.). The Security Deposit Schedule is included as Appendix E.

10.10 PRE AND POST LEASING REQUIREMENTS

A) The Lease Agreement

A Lease Agreement is to be entered into between the Housing Authority and each Family. The Agreement (which is contained in Appendix F of this Policy) is to be kept current at all times and are to reflect the obligations of the Families and SCCHA.

1. The Head of Household, Spouse, and all adult household members and the authorized SCCHA staff person, shall execute an Agreement prior to actual admission. A copy shall be given to the resident and the original shall be filed in the permanent record folder established for the Family.
2. If, through any cause, the signer of the Agreement ceases to be the Head of Household, the Agreement is to be voided and a new one executed and signed by the new Head of Household; provided that the Family is eligible for continued occupancy as set forth in this Policy.
3. The established Head of Household shall at anytime reserve the right to remove any household member, including a co-head or other adult

member, from the agreement. When an adult member leaves the household, evidence of the new residency must be submitted to Management before the person is removed from the lease and/or his/her income is deleted from the rent calculation. SCCHA also reserves the right to require documentation regarding the new residency of minors who have reportedly left the household.

4. A leasehead wanting to add a person(s) to their lease agreement, must submit a fully completed "Lease Add-On Application" before the person in question establishes residency at the leased premises. SCCHA reserves the right to approve or disapprove the addition of any person(s) for occupancy based upon the selection procedures used to screen new applicants, and subject to all other applicable provisions contained in the ACO Policy (i.e. maximum occupancy levels, care of foster children, live-in aids, etc.).
5. If for any reason a Family transfers to a different dwelling unit, the existing Agreement is to be voided and a new Agreement executed for the dwelling unit into which the Family is moving.
6. If the Authority desires to change, amend or waive any provision of the Agreement with respect to any individual or group of residents, an appropriate rider is to be prepared, signed by the Head of Household and the Authority, and attached to and made part of the Agreement.

B) PHOTOGRAPHS

For identification purposes, all new residents at the time of their move-in and all existing residents at the time of their next scheduled rent review shall have their photograph taken for inclusion in SCCHA's resident file. Photographs are required for all household members age 12 and older. It is desirable to have a photograph on file of every household member, regardless of age. If household members are not readily available during business hours to have their photograph taken, a recent photograph the resident obtained may be submitted to Management.

C) PRINCIPAL RESIDENCE

All families must use the dwelling unit for their principal place of residence. Ownership or use of a secondary residence is prohibited and sufficient grounds for lease termination.

D) EMANCIPATED MINORS

The Authority will enter into a Lease Agreement with a minor only if the minor has been declared legally emancipated through verifiable court action.

E) RE-ADMISSION

The St. Clair County Housing Authority shall have the right to re-admit within twelve (12) months of their move-out residents who vacated upon their own initiative and left in good standing. The intent is to offer some level of protection to families that pursue self-sufficiency, but subsequently experience unexpected financial problems beyond their control and to allow residents who must give up their unit due to medical/health problems to return once their health improves. Residents determined eligible for re-admission under this provision shall be eligible for immediate assignment on the Conditionally Approved Applicants' Listing and shall by-pass the waiting list.

F) ABSENCE FROM UNIT DUE TO MEDICAL REASONS

A resident may maintain their apartment for up to six months in the event that they are temporarily absent from the unit due to verifiable medical conditions (i.e. hospitalization, convalescent center, etc.), provided the monthly rent (and any other charges) are paid and utility service is maintained.

G) BANNING OF CERTAIN INDIVIDUALS

Due to drug related and violent criminal activity and as part of its effort to provide decent and safe housing, SCCHA reserves the right to ban certain individuals from its properties. The procedure for doing this are contained in the Ban and Bar Policy (Appendix G).

11.0 INCOME, EXCLUSIONS FROM INCOME, AND DEDUCTIONS FROM INCOME

To determine annual income, the St. Clair County Housing Authority counts the income of all family members, excluding the types and sources of income that are specifically excluded. Once the annual income is determined, the St. Clair County Housing Authority subtracts all allowable deductions (allowances) to determine the Total Resident Payment.

11.1 INCOME

Annual income means all amounts, monetary or not, that:

- A. Go to (or on behalf of) the family head or spouse (even if temporarily absent) or to any other family member; or
- B. Are anticipated to be received from a source outside the family during the 12-

month period following admission or annual reexamination effective date; and

- C. Are not specifically excluded from annual income.

Annual income includes, but is not limited to:

- A. The full amount, before any payroll deductions, of wages and salaries, overtime pay, commissions, fees, tips and bonuses, and other compensation for personal services.
- B. The net income from the operation of a business or profession. Expenditures for business expansion or amortization of capital indebtedness are not used as deductions in determining net income. An allowance for depreciation of assets used in a business or profession may be deducted, based on straight-line depreciation, as provided in Internal Revenue Service regulations. Any withdrawal of cash or assets from the operation of a business or profession is included in income, except to the extent the withdrawal is a reimbursement of cash or assets invested in the operation by the family.
- C. Interest, dividends, and other net income of any kind from real or personal property. Expenditures for amortization of capital indebtedness are not used as deductions in determining net income. An allowance for depreciation of assets used in a business or profession may be deducted, based on straight-line depreciation, as provided in Internal Revenue Service regulations. Any withdrawal of cash or assets from an investment is included in income, except to the extent the withdrawal is reimbursement of cash or assets invested by the family. Where the family has net family assets in excess of \$5,000, annual income includes the greater of the actual income derived from all net family assets or a percentage of the value of such assets based on the current passbook savings rate, as determined by HUD.
- D. The full amount of periodic amounts received from Social Security, annuities, insurance policies, retirement funds, pensions, disability or death benefits, and other similar types of periodic receipts, including a lump-sum amount or prospective monthly amounts for the delayed start of a periodic amount. (However, deferred periodic amounts from supplemental security income and Social Security benefits that are received in a lump sum amount or in prospective monthly amounts are excluded.)
- E. Payments in lieu of earnings, such as unemployment and disability compensation, worker's compensation, and severance pay. (However, lump sum additions such as insurance settlement payments from worker's compensation are excluded.)
- F. Welfare assistance.

1. If the welfare assistance payment includes an amount specifically designated for shelter and utilities that is subject to adjustment by the welfare assistance agency in accordance with the actual cost of shelter and utilities, the amount of welfare assistance income to be included as income consists of:
 - a. The amount of the allowance or grant exclusive of the amount specifically designated for shelter or utilities; plus
 - b. The maximum amount that the welfare assistance agency could in fact allow the family for shelter and utilities. If the family's welfare assistance is ratably reduced from the standard of need by applying a percentage, the amount calculated under this requirement is the amount resulting from one application of the percentage.
 2. If the amount of welfare is reduced due to an act of fraud by a family member or because of any family member's failure to comply with requirements to participate in an economic self-sufficiency program or work activity, the amount of rent required to be paid by the family will not be decreased. In such cases, the amount of income attributable to the family will include what the family would have received had they complied with the welfare requirements and/or had not committed an act of fraud.
 3. If the amount of welfare assistance is reduced as a result of a lifetime time limit, the reduced amount is the amount that shall be counted as income.
- G. Periodic and determinable allowances, such as alimony, child support payments, and regular contributions or gifts received from organizations or from persons not residing in the dwelling.
- H. All regular pay, special pay, and allowances of a member of the Armed Forces. (Special pay to a member exposed to hostile fire is excluded.)

11.2 ANNUAL INCOME EXCLUSIONS

Annual income does not include the following:

- A. Income from employment of children (including foster children) under the age of 18 years;
- B. Payments received for the care of foster children or foster adults (usually persons with disabilities, unrelated to the resident family, who are unable to live alone);

- C. Lump-sum additions to family assets, such as inheritances, insurance settlement payments (including payments under health and accident insurance and worker's compensation), capital gains, and settlement for personal or property losses;
- D. Amounts received by the family that are specifically for, or in reimbursement of, the cost of medical expenses for any family member;
- E. Income of a live-in aide;
- F. The full amount of student financial assistance paid directly to the student or to the educational institution;
- G. The special pay to a family member serving in the Armed Forces who is exposed to hostile fire;
- H. The amounts received from the following programs:
 - 1. Amounts received under training programs funded by HUD;
 - 2. Amounts received by a person with a disability that are disregarded for a limited time for purposes of Supplemental Security Income eligibility and benefits because they are set aside for use under a Plan to Attain Self-Sufficiency (PASS);
 - 3. Amounts received by a participant in other publicly assisted programs that are specifically for or in reimbursement of out-of-pocket expenses incurred (special equipment, clothing, transportation, child care, etc.) and that are made solely to allow participation in a specific program;
 - 4. Amounts received under a resident service stipend. A resident service stipend is a modest amount (not to exceed \$200 per month) received by a resident for performing a service for the Housing Authority or owner, on a part-time basis, that enhances the quality of life in the development. Such services may include, but are not limited to, fire patrol, hall monitoring, lawn maintenance, and resident initiatives coordination. No resident may receive more than one such stipend during the same period of time;
 - 5. Incremental earnings and benefits resulting to any family member from participation in qualifying State or local employment training programs (including training programs not affiliated with a local government) and training of a family member as resident management staff. Amounts excluded by this provision must be received under employment training programs with clearly defined goals and objectives and are excluded only for the period during which the family member participates in the employment training program;

6. Temporary, nonrecurring or sporadic income (including gifts);
7. Reparation payments paid by a foreign government pursuant to claims filed under the laws of that government by persons who were persecuted during the Nazi era;
8. Earnings in excess of \$480 for each full-time student 18 years old or older (excluding the head of household and spouse);
9. Adoption assistance payments in excess of \$480 per adopted child;
10. For family members who enrolled in certain training programs prior to 10/1/99, the earnings and benefits resulting from the participation if the program provides employment training and supportive services in accordance with the Family Support Act of 1988, Section 22 of the 1937 Act (42 U.S.C. 1437t), or any comparable Federal, State, or local law during the exclusion period. For purposes of this exclusion the following definitions apply:
 - a. Comparable Federal, State or local law means a program providing employment training and supportive services that:
 - i. Is authorized by a Federal, State or local law;
 - ii. Is funded by the Federal, State or local government;
 - iii. Is operated or administered by a public agency; and
 - iv. Has as its objective to assist participants in acquiring employment skills.
 - b. Exclusion period means the period during which the family member participates in a program described in this section, plus 18 months from the date the family member begins the first job acquired by the family member after completion of such program that is not funded by public housing assistance under the 1937 Act. If the family member is terminated from employment with good cause, the exclusion period shall end.
 - c. Earnings and benefits means the incremental earnings and benefits resulting from a qualifying employment training program or subsequent job.
11. The incremental earnings due to employment during the 12-month period following date of hire shall be excluded. This exclusion (paragraph 11) will not apply for any family who concurrently is eligible for exclusion #10. Additionally, this exclusion is only available to the following families:

- a. Families whose income increases as a result of employment of a family member who was previously unemployed for one or more years.
- b. Families whose income increases during the participation of a family member in any family self-sufficiency program.
- c. Families who are or were, within 6 months, assisted under a State TANF program. TANF includes both regular monthly income and one-time benefits and/or services that total at least \$500 over a six-month period.

(While HUD regulations allow for the housing authority to offer an escrow account in lieu of having a portion of their income excluded under this paragraph, it is the policy of this housing authority to provide the exclusion in all cases.)

12. **Earned Income Disallowance (EID)**

- The regulations governing the earned income disallowance (EID) in the public housing program are located at 24 CFR 960.255.
- The EID calls for the exclusion of increases in income attributable to new employment or increased earnings over income received prior to qualifying for the disallowance.

QUALIFICATIONS

- To qualify for the EID, a family must be receiving assistance under the public housing program.
 - Applicant families are not eligible for the EID.
- In addition, to qualify for the EID, a family must experience an increase in annual income that is the result of **one** of the following three events:
 1. Employment by a family member who was “previously unemployed” for one or more years prior to employment.
 - The definition of *previously employed* includes a person who has earned not more than could be earned working 10 hours per week for 50 weeks at the established minimum wage-i.e., the minimum wage applicable to the locality in which the EID determination is made.

2. Increased earnings by a family member **during** participation in an economic self-sufficiency program or other job-training program.

- Note the emphasis on the word *during*. The increase in earnings must occur *while* the individual is enrolled in the program.
- An *economic self-sufficiency program* (as defined at 24 CFR 5.603(b)) is any program designed to encourage, assist, train, or facilitate the economic independence of HUD-assisted families or to provide work for such families. Economic self-sufficiency programs include:

- Job Training
- Employment counseling
- Work placement
- Basic skills training
- Education
- English proficiency
- Workfare
- Financial or household management
- Apprenticeship
- Any program necessary to ready a participant for work (including a substance abuse or mental health treatment program)
- Other work activities

3. New employment or increased earnings by a family member who has received TANF benefits or services within the past six months.

- If the TANF is received in the form of monthly maintenance, there is no minimum amount.
- If the TANF is received in the form of one-time payments, wage subsidies, or transportation assistance, the total amount received over a six-month period must be at least \$500.

INITIAL 12-MONTH EXCLUSION

- During the initial 12-month exclusion period, the full amount of the increase in income attributable to employment or increased earnings is excluded.

- The initial full exclusion period begins on the date the family member who qualifies is employed or first experiences an increase in income due to employment.
- The initial full exclusion extends for a total of 12 cumulative months.

- The months do not have to be consecutive.

SECOND 12-MONTH EXCLUSION AND PHASE-IN

- During the second 12-month exclusion and phase-in period, the exclusion is reduced to half, or 50 percent, of the increase in income attributable to employment or increased earnings.
- The second 12-month exclusion period begins after the family member who qualifies has received 12 cumulative months of full exclusion.
- Like the initial period, the phase-in period extends for a total of 12 cumulative months.

- Again, the months need not be consecutive.

MAXIMUM FOUR-YEAR DISALLOWANCE

- EID regulations call for a four-year (48-month) **lifetime** maximum on the disallowance.
 - The four-year maximum exclusion clock starts ticking at the beginning of the initial exclusion period and ends exactly 48 months later.
 - No exclusion may be given after this lifetime limit has been reached.
- The EID regulations also call for a maximum of 12 cumulative months for each of the two exclusion periods (full and phase in).
 - Thus, an individual theoretically can “max out” after receiving the EID for only two years-12 consecutive full-exclusion months followed immediately by 12 consecutive phase-in exclusion months.

13. Deferred periodic amounts from supplemental security income and Social Security benefits that are received in a lump sum amount or in prospective monthly amounts;
14. Amounts received by the family in the form of refunds or rebates under State or local law for property taxes paid on the dwelling unit;
15. Amounts paid by a State agency to a family with a member who has a developmental disability and is living at home to offset the cost of services and equipment needed to keep the developmentally disabled family member at home; or
16. Amounts specifically excluded by any other Federal statute from consideration as income for purposes of determining eligibility or benefits. These exclusions include:
 - a. The value of the allotment of food stamps
 - b. Payments to volunteers under the Domestic Volunteer Services Act of 1973
 - c. Payments received under the Alaska Native Claims Settlement Act
 - d. Income from submarginal land of the U.S. that is held in trust for certain Indian tribes
 - e. Payments made under HHS's Low-Income Energy Assistance Program
 - f. Payments received under the Job Training Partnership Act
 - g. Income from the disposition of funds of the Grand River Band of Ottawa Indians
 - h. The first \$2000 per capita received from judgment funds awarded for certain Indian claims
 - i. Amount of scholarships awarded under Title IV including Work Study
 - j. Payments received under the Older Americans Act of 1965
 - k. Payments from Agent Orange Settlement
 - l. Payments received under the Maine Indian Claims Act

- m. The value of child care under the Child Care and Development Block Grant Act of 1990
- n. Earned income tax credit refund payments
- o. Payments for living expenses under the Americorps Program
- p. Additional income exclusions provided by and funded by the St. Clair County Housing Authority

The St. Clair County Housing Authority will not provide exclusions from income in addition to those already provided for by HUD.

11.3 DEDUCTIONS FROM ANNUAL INCOME

The following deductions will be made from annual income:

- A. \$480 for each dependent;
- B. \$400 for any elderly family or disabled family;
- C. For any family that is not an elderly or disabled family but has a member (other than the head or spouse) who is a person with a disability, disability assistance expenses in excess of 3% of annual income. This allowance may not exceed the employment income received by family members who are 18 years of age or older as a result of the assistance to the person with disabilities.
- D. For any elderly or disabled family:
 - 1. That has no disability assistance expenses, an allowance for medical expenses equal to the amount by which the medical expenses exceed 3% of annual income;
 - 2. That has disability expenses greater than or equal to 3% of annual income, an allowance for disability assistance expenses computed in accordance with paragraph C, plus an allowance for medical expenses that equal the family's medical expenses;
 - 3. That has disability assistance expenses that are less than 3% of annual income, an allowance for combined disability assistance expenses and medical expenses that is equal to the total of these expenses less 3% of annual income.
- E. Child care expenses.

12.0 VERIFICATION

The St. Clair County Housing Authority will verify information related to waiting list preferences, eligibility, admission, and level of benefits prior to admission. Periodically during occupancy, items related to eligibility and rent determination shall also be reviewed and verified. Income, assets, and expenses will be verified, as well as disability status, need for a live-in aide and other reasonable accommodations; full time student status of family members 18 years of age and older; Social Security numbers; and citizenship/eligible noncitizen status. Age and relationship will only be verified in those instances where needed to make a determination of level of assistance.

12.1 METHODS OF VERIFICATION

The SCCHA will verify information through the five methods of verification acceptable to HUD in the following order:

1. Up-front income verification (UIV)
2. Third-party written verification
3. Third-party oral verification
4. Review of documents
5. Certification/self-declaration

Up-Front Income Verification

The SCCHA will utilize up-front income verification tools, including TASS and the Work Number, whenever possible.

When HUD announces the availability of the UIV system for our PHA, we will utilize additional UIV tools, including a centralized computer matching system. SCCHA will pursue other computer matching agreements with federal, state, and local government agencies.

Use of Third Party Verification to Supplement Up-Front Income Verification

Up-front income verification replaces, to the maximum extent possible, the more time-consuming and less accurate third-party verification process of contacting individual employers identified by families or reviewing outdated income verification documents. However, third-party verification may continue to be necessary to complement up-front income verification. Up-front income verification should not be considered an automatic substitute for other third-party verification. Rather, up-front income verification may supplement other verification documentation, such as original, current tenant-provided documents.

Third Party Written Verification

Third-party verification is used to verify information directly with the source.

Third-party written verification forms will be sent and returned via first-class mail. The family will be required to sign an authorization allowing the information source to release the specified information.

Two attempts to obtain third party verification will be made before relying on another method.

Verifications receive electronically directly from the source are considered third-party written verifications.

Third-party verification forms, including computerized printouts, will not be hand-carried by the family under any circumstances. SCCHA will send requests for third-party written verifications to the source at all times regardless of whether the family provides a computerized printout.

SCCHA will allow four weeks for return of third-party verifications.

If third-party verification is not used, SCCHA will document the reasons in the file.

Verifications are valid for 90 days from date of receipt.

Third-Party Oral Verification

Oral third-party verification will be used when written third-party verification is delayed or impossible. When third-party oral verification is used, staff will be required to complete a Certification of Document Viewed or Person Contacted form, noting with whom they spoke, the date of the conversation, and the facts provided. If oral third-party verification is provided by telephone, SCCHA must originate the call. If third-party verification is not available, SCCHA will compare the specified information to any documents provided by the family.

Review of Documents

In the event that third-party written or oral verification is unavailable or information has not been verified by a third party within four weeks, SCCHA will annotate the file accordingly and utilize documents provided by the family as the primary source if the documents contain complete information.

All such documents, excluding government checks, will be photocopied and retained in the family file. When documents cannot be photocopied, staff viewing the documents will complete a Certification of Document Viewed or Person Contacted form.

SCCHA will accept the following documents from families providing that tampering can be easily noted:

- Printed wage stubs
- Computer printouts from employers
- Signed letter (provided that the information is confirmed by phone)
- Other documents identified by SCCHA as acceptable verification

SCCHA will accept faxed documents.

SCCHA will not accept photocopies.

If third-party verification is received after documents have been accepted as provisional verification and there is a discrepancy, SCCHA will contact the third-party source and the family to resolve differences.

SCCHA will allow up to one week for families to provide documents when third-party verification is impossible to obtain.

SCCHA will not delay the processing of an application beyond 45 days because a third-party information provider does not return a verification in a timely manner.

Self-Certification/Self –Declaration

When information cannot be verified by a third party or by review of documents, families will be required to submit a self-certification.

Self-certification means a notarized statement signed under penalty of perjury in the presence of a witness.

SCCHA will allow up to one week for a family to provide a self-certification or self-declaration if other forms of verification are impossible to obtain.

Procedural Matters

Age, relationship, U.S. citizenship, and Social Security numbers will generally be verified with documentation provided by the family. SCCHA shall require applicants/residents to document legal guardianship/custody for minor household members who are not children of the head of household or other adult family member listed on the application/lease agreement. For citizenship, the family's certification will be accepted. (Or for citizenship documentation such as listed below will be required.) Verification of these items will include photocopies of the Social Security cards and other documents presented by the family, the INS SAVE approval code, and forms signed by the family.

To the fullest extent possible employment income and social security benefit information shall be verified using HUD's UIV system. Other information will be verified by third

party verification. This type of verification includes written documentation with forms sent directly to and received directly by a source, not passed through the hands of the family. This verification may also be direct contact with the source, in person or by telephone. It may also be a report generated by a request from the St. Clair County Housing Authority or automatically by another government agency, i.e. the Social Security Administration. Verification forms and reports received will be contained in the applicant/resident file. Oral third party documentation will include the same information as if the documentation had been written, i.e. name date of contact, amount received, etc.

When third party verification cannot be obtained, the St. Clair County Housing Authority will accept documentation received from the applicant/resident. Hand-carried documentation will be accepted if the St. Clair County Housing Authority has been unable to obtain third party verification in a 4-week period of time. Photocopies of the documents provided by the family will be maintained in the file.

When neither third party verification nor hand-carried verification can be obtained, the St. Clair County Housing Authority will accept a notarized statement signed by the head, spouse or co-head. Such documents will be maintained in the file.

12.2 TYPES OF VERIFICATION

The chart below outlines the factors that may be verified and gives common examples of the verification that will be sought. To obtain written third party verification, the St. Clair County Housing Authority will send a request form to the source along with a release form signed by the applicant/resident via first class mail.

Verification Requirements for Individual Items		
Item to Be Verified	3 rd party verification	Hand-carried verification
General Eligibility Items		
Social Security Number	Letter from Social Security, electronic reports	Social Security card
Citizenship	N/A	Signed certification, voter's registration card, birth certificate, etc.
Eligible immigration status	INS SAVE confirmation #	INS card
Disability	Letter from medical professional, SSI, etc	Proof of SSI or Social Security disability payments
Full time student status (if >18)	Letter from school	For high school students, any document evidencing

Verification Requirements for Individual Items		
Item to Be Verified	3 rd party verification	Hand-carried verification
		enrollment
Need for a live-in aide	Letter from doctor or other professional knowledgeable of condition	N/A
Child care costs	Letter from care provider	Bills and receipts
Disability assistance expenses	Letters from suppliers, care givers, etc.	Bills and records of payment
Medical expenses	Letters from providers, Prescription record from pharmacy, medical professional's letter stating assistance or a companion animal is needed	Bills, receipts, records of payment, dates of trips, mileage log, receipts for fares and tolls
Value of and Income from Assets		
Savings, checking accounts	Letter from institution	Passbook, most current statements
CDS, bonds, etc	Letter from institution	Tax return, information brochure from institution, the CD, the bond
Stocks	Letter from broker or holding company	Stock or most current statement, price in newspaper or through Internet
Real property	Letter from tax office, assessment, etc.	Property tax statement (for current value), assessment, records or income and expenses, tax return
Personal property	Assessment, bluebook, etc	Receipt for purchase, other evidence of worth
Cash value of life insurance policies	Letter from insurance company	Current statement
Assets disposed of for less than fair market value	N/A	Original receipt and receipt at disposition, other evidence of

Verification Requirements for Individual Items		
Item to Be Verified	3 rd party verification	Hand-carried verification
		worth
Income		
Earned income	Electronically from HUD's UIV system. Letter from employer	Multiple pay stubs
Self-employed	N/A	Tax return from prior year, books of accounts
Regular gifts and contributions	Letter from source, letter from organization receiving gift (i.e., if grandmother pays day care provider, the day care provider could so state)	Bank deposits, other similar evidence
Alimony/child support	Court order, letter from source, letter from Human Services	Record of deposits, divorce decree
Periodic payments (i.e., social security, welfare, pensions, workers compensation, unemployment)	Letter or electronic reports from the source or through HUD's UIV system.	Award letter, letter announcing change in amount of future payments
Training program participation	Letter from program provider indicating <ul style="list-style-type: none"> - whether enrolled or completed - whether training is HUD-funded - whether Federal, State, local govt., or local program - whether it is employment training - whether it has clearly defined goals and objectives - whether program has supportive services - whether payments are for out-of-pocket expenses incurred in order to participate in a program - date of first job after program completion 	N/A Evidence of job start

12.3 VERIFICATION OF CITIZENSHIP OR ELIGIBLE NONCITIZEN STATUS

The citizenship/eligible noncitizen status of each family member regardless of age must be determined.

Prior to being admitted, or at the first reexamination, all citizens and nationals will be required to sign a declaration under penalty of perjury. They will be required to show proof of their status by such means as a Social Security card, birth certificate, military ID, or military DD 214 Form.

Prior to being admitted or at the first reexamination, all eligible noncitizens who are 62 years of age or older will be required to sign a declaration under penalty of perjury. They will also be required to show proof of age.

Prior to being admitted or at the first reexamination, all eligible noncitizens must sign a declaration of their status and a verification consent form and provide their original INS documentation. The St. Clair County Housing Authority will make a copy of the individual's INS documentation and place the copy in the file. The St. Clair County Housing Authority will also verify their status through the INS SAVE system. If the INS SAVE system cannot confirm eligibility, the St. Clair County Housing Authority will mail information to the INS in order that a manual check can be made of INS records.

Family members who do not claim to be citizens, nationals, or eligible noncitizens must be listed on a statement of noneligible members and the list must be signed by the head of the household.

Noncitizen students on student visas, though in the country legally, are not eligible to be admitted to public housing.

Any family member who does not choose to declare their status must be listed on the statement of noneligible members.

If no family member is determined to be eligible under this section, the family's eligibility will be denied.

The family's assistance will not be denied, delayed, reduced, or terminated because of a delay in the process of determining eligible status under this section, except to the extent that the delay is caused by the family.

If the St. Clair County Housing Authority determines that a family member has knowingly permitted an ineligible noncitizen (other than any ineligible noncitizens listed on the lease) to permanently reside in their public housing unit, the family will be evicted. Such family will not be eligible to be readmitted to public housing for a period of 24 months from the date of eviction or termination.

12.4 VERIFICATION OF SOCIAL SECURITY NUMBERS

Prior to admission, each family member who has a Social Security number and who is at least 6 years of age must provide verification of their Social Security number. New family members at least 6 years of age must provide this verification prior to being added to the lease. Children in assisted households must provide this verification at the first regular reexamination after turning six.

The best verification of the Social Security number is the original Social Security card. If the card is not available, the St. Clair County Housing Authority will accept letters from the Social Security Agency that establishes and states the number. Documentation from other governmental agencies will also be accepted that establishes and states the number. Driver's licenses, military IDs, passports, or other official documents that establish and state the number are also acceptable.

If an individual states that they do not have a Social Security number, they will be required to sign a statement to this effect. The St. Clair County Housing Authority will not require any individual who does not have a Social Security number to obtain a Social Security number.

If a member of an applicant family indicates they have a Social Security number, but cannot readily verify it, the family cannot be housed until verification is provided.

If a member of a resident family indicates they have a Social Security number, but cannot readily verify it, they shall be asked to certify to this fact and shall have up to sixty (60) days to provide the verification. If the individual is at least 62 years of age, they will be given one hundred and twenty (120) days to provide the verification. If the individual fails to provide the verification within the time allowed, the family will be evicted.

12.5 TIMING OF VERIFICATION

Verification information must be dated within ninety (90) days of certification or reexamination. If the verification is older than this, the source will be contacted and asked to provide information regarding any changes.

When an interim reexamination is conducted, the Housing Authority will verify and update all information related to family circumstances and level of assistance. (Or, the Housing Authority will only verify and update those elements reported to have changed.)

12.6 FREQUENCY OF OBTAINING VERIFICATION

For each family member, citizenship/eligible noncitizen status will be verified only once. This verification will be obtained prior to admission. If the status of any family member was not determined prior to admission, verification of their status will be obtained at the

next regular reexamination. Prior to a new member joining the family, their citizenship/eligible noncitizen status will be verified.

For each family member age 6 and above, verification of Social Security number will be obtained only once. This verification will be accomplished prior to admission. When a family member who did not have a Social Security number at admission receives a Social Security number, that number will be verified at the next regular reexamination. Likewise, when a child turns six, their verification will be obtained at the next regular reexamination.

Information needed for rent determination and other program purposes (i.e. disability, need for live-in aide, etc.), shall be verified as determined necessary by the St. Clair County Housing Authority.

12.7 *Upfront Income Verification Guidelines and Security Procedures*

SCCHA has adopted “HUD Guidelines for Projecting Annual Income When Upfront Income Verification (UIV) Data is Available” as it appears in Appendix H. SCCHA has also adopted HUD’s UIV System Security Procedure as it appears in Appendix I to ensure the proper handling and security of income data obtained through the UIV system.

13.0 DETERMINATION OF TOTAL RESIDENT PAYMENT AND RESIDENT RENT

13.1 FAMILY CHOICE

At admission and each year in preparation for their annual reexamination, each family is given the choice of having their rent determined under the formula method or having their rent set at the flat rent amount.

- A. Families who opt for the flat rent will be required to go through the income reexamination process every three years, rather than the annual review they would otherwise undergo.
- B. Families who opt for the flat rent may request to have a reexamination and return to the formula based method at any time for any of the following reasons:
 - 1. The family's income has decreased.
 - 2. The family's circumstances have changed increasing their expenses for child care, medical care, etc.
 - 3. Other circumstances creating a hardship on the family such that the formula method would be more financially feasible for the family.

13.2 THE FORMULA METHOD

The total resident payment is equal to the highest of:

- A. 10% of monthly income;
- B. 30% of adjusted monthly income; or
- C. The welfare rent.

The family will pay the greater of the total resident payment or the minimum rent of \$50, but never more than the ceiling rent.

In the case of a family who has qualified for the income exclusion at Section 11.2(H)(11), upon the expiration of the 12-month period described in that section, an additional rent benefit accrues to the family. If the family member's employment continues, then for the 12-month period following the 12-month period of disallowance, the resulting rent increase will be capped at 50 percent of the rent increase the family would have otherwise received.

13.3 MINIMUM RENT

The St. Clair County Housing Authority has set the minimum rent at \$50. However if the family requests a hardship exemption, the St. Clair County Housing Authority will immediately suspend the minimum rent for the family until the Housing Authority can determine whether the hardship exists and whether the hardship is of a temporary or long-term nature.

- A. A hardship exists in the following circumstances:
 - 1. When the family has lost eligibility through no fault of their own for or is awaiting an eligibility determination for a Federal, State, or local assistance program;
 - 2. When the family would be evicted as a result of the imposition of the minimum rent requirement;
 - 3. When the income of the family has decreased because of changed circumstances, including loss of employment;
 - 4. When the family has an increase in expenses because of changed circumstances, for medical costs, childcare, transportation, education, or similar items;
 - 5. When a death has occurred in the family.

- B. No hardship. If the Housing Authority determines there is no qualifying hardship, the minimum rent will be reinstated, including requiring back payment of minimum rent for the time of suspension.
- C. Temporary hardship. If the Housing Authority reasonably determines that there is a qualifying hardship but that it is of a temporary nature, the minimum rent will not be imposed for a period of 90 days from the date of the family's request. At the end of the 90-day period, the minimum rent will be imposed retroactively to the time of suspension. The Housing Authority will offer a repayment agreement in accordance with the Section 19 of this policy for any rent not paid during the period of suspension. During the suspension period the Housing Authority will not evict the family for nonpayment of the amount of resident rent owed for the suspension period.
- D. Long-term hardship. If the Housing Authority determines there is a long-term hardship, the family will be exempt from the minimum rent requirement until the hardship no longer exists.
- E. Appeals. The family may use the grievance procedure to appeal the Housing Authority's determination regarding the hardship. No escrow deposit will be required in order to access the grievance procedure.

13.4 THE FLAT RENT

The St. Clair County Housing Authority has set a flat rent for each public housing unit. In doing so, it considered the size and type of the unit, as well as its condition, amenities, services, and neighborhood. The St. Clair County Housing Authority determined the market value of the unit and set the rent at the market value. The amount of the flat rent will be reevaluated annually and adjustments applied. Affected families will be given a 30-day notice of any rent change. Adjustments are applied on the anniversary date for each affected family (for more information on flat rents, see Section 15.3).

The St. Clair County Housing Authority will post the flat rents at each of the developments and at the central office and are incorporated in this policy upon approval by the Board of Commissioners. See Appendix H.

13.5 RENT FOR FAMILIES UNDER THE NONCITIZEN RULE

A mixed family will receive full continuation of assistance if all of the following conditions are met:

- C. The family was receiving assistance on June 19, 1995;
- D. The family was granted continuation of assistance before November 29, 1996;
- E. The family's head or spouse has eligible immigration status; and

- F. The family does not include any person who does not have eligible status other than the head of household, the spouse of the head of household, any parent of the head or spouse, or any child (under the age of 18) of the head or spouse.

If a mixed family qualifies for prorated assistance but decides not to accept it, or if the family has no eligible members, the family may be eligible for temporary deferral of termination of assistance to permit the family additional time for the orderly transition of some or all of its members to locate other affordable housing. Under this provision, the family receives full assistance. If assistance is granted under this provision prior to November 29, 1996, it may last no longer than three (3) years. If granted after that date, the maximum period of time for assistance under the provision is eighteen (18) months. The St. Clair County Housing Authority will grant each family a period of six (6) months to find suitable affordable housing. If the family cannot find suitable affordable housing, the St. Clair County Housing Authority will provide additional search periods up to the maximum time allowable.

Suitable housing means housing that is not substandard and is of appropriate size for the family. Affordable housing means that it can be rented for an amount not exceeding the amount the family pays for rent, plus utilities, plus 25%.

The family's assistance is prorated in the following manner:

- G. Determine the 95th percentile of gross rents (resident rent plus utility allowance) for the St. Clair County Housing Authority. The 95th percentile is called the maximum rent.
- H. Subtract the family's total resident payment from the maximum rent. The resulting number is called the maximum subsidy.
- I. Divide the maximum subsidy by the number of family members and multiply the result times the number of eligible family members. This yields the prorated subsidy.
- J. Subtract the prorated subsidy from the maximum rent to find the prorated total resident payment. From this amount subtract the full utility allowance to obtain the prorated resident rent.

13.6 UTILITY ALLOWANCE

A. Utility Allowance Schedule

The St. Clair County Housing Authority shall establish a utility allowance for all resident-paid utilities. The allowance will be based on a reasonable consumption of utilities by an energy-conservative household of modest circumstances consistent with the requirements of a safe, sanitary, and healthful environment. In setting the allowance,

the St. Clair County Housing Authority will review the actual consumption of resident families as well as changes made or anticipated due to modernization (weatherization efforts, installation of energy-efficient appliances, etc). Allowances will be evaluated at least annually as well as any time utility rate changes by 10% or more since the last revision to the allowances.

The utility allowance will be subtracted from the family's formula or flat rent to determine the amount of the Resident Rent. The Resident Rent is the amount the family owes each month to the St. Clair County Housing Authority. The amount of the utility allowance is then still available to the family to pay the cost of their utilities. Any utility cost above the allowance is the responsibility of the resident. Any savings resulting from utility costs below the amount of the allowance belongs to the resident.

Utility allowance revisions based on rate changes shall be effective retroactively to the first day of the month following the month in which the last rate change took place. Revisions based on changes in consumption or other reasons shall become effective the first of the month following approval by the Board of Commissioners.

Families with high utility costs are encouraged to contact the St. Clair County Housing Authority for an energy analysis. The analysis may identify problems with the dwelling unit that once corrected will reduce energy costs. The analysis can also assist the family in identifying ways they can reduce their costs. The Utility Allowance Schedule as established appears in Appendix I.

B. *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 reasonable detection of the resident that results in excessive natural gas or electric consumption; C) SCCHA 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. Individual relief shall not be granted based upon environmental factor (i.e. excess heat or cold spells).

In cases, where it is determines 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 shall generally 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. The written requests must be submitted to the Property Manager within 30 days of the date of the billing for which individual relief is sought.

13.7 PAYING RENT

Rent and other charges are due and payable on the first day of the month. All rents should be paid at the SCCHA Central Office...1790 South 74th Street, Belleville, IL 62223 or mailed to P.O. Box 23380, Belleville, IL 62226. Reasonable accommodations for this requirement will be made for persons with disabilities. As a safety measure, no cash shall be accepted as a rent payment.

The procedures used to collect monies due by residents, including rent and all other charges, shall be consistent with SCCHA's established Collection Policy, which appears as Appendix #H.

14.0 CONTINUED OCCUPANCY AND COMMUNITY SERVICE

14.1 GENERAL

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

14.2 EXEMPTIONS

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

- A. Family members who are 62 or older
- B. Family members who are blind or disabled
- C. Family members who are the primary care giver for someone who is blind or disabled
- D. Family members engaged in work activity
- E. Family members who are exempt from work activity under part A title IV of the

Social Security Act or under any other State welfare program, including the welfare-to-work program

- F. Family members receiving assistance under a State program funded under part A title IV of the Social Security Act or under any other State welfare program, including welfare-to-work and who are in compliance with that program

14.3 NOTIFICATION OF THE REQUIREMENT

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

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

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

14.4 VOLUNTEER OPPORTUNITIES

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

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

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

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

14.5 THE PROCESS

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

- A. Provide a list of volunteer opportunities to the family members.
- B. Provide information about obtaining suitable volunteer positions.
- C. Provide a volunteer time sheet to the family member. Instructions for the time sheet require the individual to complete the form and have a supervisor date and sign for each period of work.
- D. Assign family members to a volunteer coordinator who will assist the family members in identifying appropriate volunteer positions and in meeting their responsibilities. The volunteer coordinator will track the family member's progress monthly and will meet with the family member as needed to best encourage compliance.
- E. Thirty (30) days before the family's next lease anniversary date, the volunteer coordinator will advise the St. Clair County Housing Authority whether each applicable adult family member is in compliance with the community service requirement.

14.6 NOTIFICATION OF NON-COMPLIANCE WITH COMMUNITY SERVICE REQUIREMENT

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

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

14.7 OPPORTUNITY FOR CURE

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

earns goes toward the current commitment until the current year's commitment is made.

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

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

15.0 RECERTIFICATIONS

At least annually, the St. Clair County Housing Authority will conduct a reexamination of family income and circumstances. The results of the reexamination determine (1) the rent the family will pay, and (2) whether the family is housed in the correct unit size.

15.1 GENERAL

The St. Clair County Housing Authority will send a notification letter to the family letting them know that it is time for their annual reexamination, giving them the option of selecting either the flat rent or formula method, and scheduling an appointment if they are currently paying a formula rent. If the family thinks they may want to switch from a flat rent to a formula rent, they should request an appointment. At the appointment, the family can make their final decision regarding which rent method they will choose. The letter also includes, for those families paying the formula method, forms for the family to complete in preparation for the interview (i.e. re-exam packet). The letter includes instructions permitting the family to reschedule the interview if necessary. The letter tells families who may need to make alternate arrangements due to a disability that they may contact staff to request an accommodation of their needs.

During the recertification, the St. Clair County Housing Authority will determine whether family composition may require a transfer to a different bedroom size unit, and if so, the family's name will placed on the transfer list.

15.2 MISSED APPOINTMENTS/FAILURE TO COOPERATE WITH RECERTIFICATION

If the family fails to respond to the letter and fails to attend the interview, a second letter will be mailed. The second letter will advise of a new time and date for the interview, allowing for the same considerations for rescheduling and accommodation as above. The letter will also advise that failure by the family to return the re-exam packet and/or attend the second scheduled interview will result in the St. Clair County Housing Authority assessing a \$50 fee, taking eviction actions against the family and/or establishing the monthly rent amount at the Flat Rent/Ceiling Rent effective the month the family's recertification was due.

15.3 FLAT RENTS

The annual letter to flat rent payers regarding the reexamination process will state the following:

- A. Each year at the time of the annual reexamination, the family has the option of selecting a flat rent amount in lieu of completing the reexamination process and having their rent based on the formula amount.
- B. The amount of the flat rent
- C. A fact sheet about formula rents that explains the types of income counted, the most common types of income excluded, and the categories allowances that can be deducted from income.
- D. Families who opt for the flat rent will be required to go through the income reexamination process every three years, rather than the annual review they otherwise would undergo.
- E. Families who opt for the flat rent may request to have a reexamination and return to the formula-based method at any time for any of the following reasons:
 - 1. The family's income has decreased.
 - 2. The family's circumstances have changed increasing their expenses for child care, medical care, etc.
 - 3. Other circumstances creating a hardship on the family such that the formula method would be more financially feasible for the family.
- F. The dates upon which the St. Clair County Housing Authority expects to review the amount of the flat rent, the approximate rent increase the family could expect, and the approximate date upon which a future rent increase could become effective.
- G. The name and phone number of an individual to call to get additional information or counseling concerning flat rents.
- H. A certification for the family to sign accepting or declining the flat rent.

Each year prior to their anniversary date, St. Clair County Housing Authority will send a reexamination letter to the family offering the choice between a flat or a formula rent. The opportunity to select the flat rent is available only at this time. At the appointment, the St. Clair County Housing Authority may assist the family in identifying the rent method that would be most advantageous for the family. If the family wishes to select the

flat rent method without meeting with the St. Clair County Housing Authority representative, they may make the selection on the form and return the form to the St. Clair County Housing Authority. In such case, the St. Clair County Housing Authority will cancel the appointment.

15.4 THE FORMULA METHOD

During the interview, the family will provide all information regarding income, assets, expenses, and other information necessary to determine the family's share of rent. The family will sign the HUD consent form and other consent forms that later will be mailed to the sources that will verify the family circumstances.

Upon receipt of verification, the St. Clair County Housing Authority will determine the family's annual income and will calculate their rent as follows.

The total resident payment is equal to the highest of:

- A. 10% of monthly income;
- B. 30% of adjusted monthly income; or
- C. The welfare rent.

The family will pay the greater of the total resident payment or the minimum rent of \$50, but never more than the ceiling rent.

If it is determined by SCCHA that a family has established a pattern of starting and stopping employment so that their monthly rent is kept artificially low, SCCHA may base their rent upon historical and projected annual earnings.

15.5 EFFECTIVE DATE OF RENT CHANGES FOR ANNUAL REEXAMINATIONS

The new rent will generally be effective upon the anniversary date with thirty (30) days notice of any rent increase to the family.

If the rent determination is delayed due to a reason beyond the control of the family, then any rent increase will be effective the first of the month after the month in which the family receives a 30-day notice of the amount. If the new rent is a reduction and the delay is beyond the control of the family, the reduction will be effective as scheduled on the anniversary date.

If the family caused the delay, then any increase will be effective on the anniversary date. Any reduction will be effective the first of the month after the rent amount is determined.

15.6 INTERIM REEXAMINATIONS

During an interim reexamination, only the information affected by the changes being reported will be reviewed and verified.

Families are required to report increases in income or decreases in allowable expenses (i.e. deductions to annual income such as child care costs) between annual reexaminations when either of the following apply:

- The family receives a Utility Reimbursement Payment (i.e. has a negative rent);
- The family member start receiving a new non-wage benefit amount such as Social Security/SSI, TANF benefits, etc.

Families not impacted by the two scenarios listed above are not required to report increases in income or decreases in allowable expenses between annual reexaminations.

Families may request an interim recertification if there has been a decrease in income or increase in deductions that results in their Total Resident Payment exceeding 30% of monthly income. Short term changes (i.e. those lasting less than 30 days) are excluded. However, the SCCHA has at its sole discretion the right, without completing a full interim recertification, to establish a rent based upon the family's estimated gross monthly income (after deductions) with a \$50.00 minimum rent (net tenant payment) for one month when a family can document an interruption of income (beyond their control and due to no fault of their own) resulting in at least a 50% reduction in their regular monthly income. This alternate rent provision is limited to one time (maximum one month) in any 12-month period).

Resident's rent shall not be reduced if the decrease in the family's annual income is caused by a reduction in the welfare or public assistance benefits received by the family that is a result of the Resident's failure to comply with the conditions of the assistance program requiring participation in an economic self-sufficiency program or other work activities. In addition, if the decrease in the family's annual income is caused by a reduction in welfare or public assistance benefits received by the family that is the result of an act of fraud, such decrease in income shall not result in a rent reduction. In such cases, the amount of income to be attributed to the family shall include what the family would have received had they complied with the welfare requirements or had not committed an act of fraud.

For the purposes of rent adjustments, the reduction of welfare or public assistance benefits to a family that occurs as a result of the expiration of a time limit for the receipt of assistance will not be considered a failure to comply with program requirements. Accordingly, a Resident's rent will be reduced as a result of such a decrease.

Families requesting an interim recertification due to a decrease in income are obligated to report any subsequent increases in income that may occur prior to the next regularly scheduled recertification. Failure to do so shall be grounds for retroactive charges and/or lease termination as determined appropriate by SCCHA.

Families are required to report the following changes to the St. Clair County Housing Authority between regular reexaminations. If the family's rent is being determined under the formula method, these changes will trigger an interim reexamination. The family shall report these changes within ten (10) days of their occurrence.

- A. A member has been added to the family through birth, adoption or court-awarded custody.
- B. A household member is leaving or has left the family unit.

All other additions to a household (including those resulting from marriage, foster care, personal care attendants, etc.) must be reported to and approved by the St. Clair County Housing Authority prior to the person(s) establishing residency at the leased premises.

Before adding the new member to the lease, the individual must complete an application form stating their income, assets, and all other information required of an applicant. The individual must provide their Social Security number if they have one and must verify their citizenship/eligible immigrant status. (Their housing will not be delayed due to delays in verifying eligible immigrant status other than delays caused by the family.) The new family member will go through the screening process similar to the process for applicants. The St. Clair County Housing Authority will determine the eligibility of the individual before adding them to the lease. If the individual is found to be ineligible or does not pass the screening criteria, they will be advised in writing and given the opportunity for an informal review. If they are found to be eligible and do pass the screening criteria, their name will be added to the lease. At the same time, if the family's rent is being determined under the formula method, the family's annual income will be recalculated taking into account the circumstances of the new family member. The effective date of the new rent will be in accordance with paragraph below 15.8.

Family members leaving the household must be reported to SCCHA within 30 days of occurrence. SCCHA shall require documentation of the family members' departure prior to removing their name from the lease.

15.7 SPECIAL REEXAMINATIONS

If a family's income is too unstable to project for twelve (12) months, including families that temporarily have no income (0 renters) or have a temporary decrease in income, the St. Clair County Housing Authority may schedule special reexaminations every sixty (60) days until the income stabilizes and an annual income can be determined.

15.8 EFFECTIVE DATE OF RENT CHANGES DUE TO INTERIM OR SPECIAL REEXAMINATIONS

Unless there is a delay in reexamination processing caused by the family, any rent increase will be effective the first of the second month after the month in which the

family receives notice of the new rent amount. If the family causes a delay, then the rent increase will be effective on the date it would have been effective had the process not been delayed (even if this means a retroactive increase).

If the new rent is a reduction and any delay is beyond the control of the family, the reduction will be effective the first of the month after the income decreased (or deductions increased).

If the new rent is a reduction and the family caused the delay or did not report the change in a timely manner, the change will be effective the first of the month after the rent amount is determined.

15.9 ADJUSTMENTS DUE TO ERRORS, MISREPRESENTATION, FAILURE TO REPORT

1. An adjustment in monthly payment shall be retroactive to the first day of the rent period affected when there is:
 - a. *an error due to misrepresentation or failure to report by the Family and the corrected determination results in increased rent;*
 - b. *an error from which the corrected determination results in decreased rent.*
2. An adjustment in monthly payment shall be effective the first day of the second month following the date an error was found if the error was not the fault of the Family and the corrected determination results in increased rent.

15.10 FAILURE TO REPORT INCOME CHANGES AND/OR MISREPRESENTATION

If it is found at the time of reexamination (or any other time) that the family has failed to report changes in family circumstances as they occurred and that such changes would have required the Family to pay a higher monthly payment, the Authority shall collect the increased payment retroactive to the first of the month after the month in which the changes occurred. Unless the St. Clair County Housing Authority approves a Repayment Agreement the amount shall be due and payable thirty (30) days from the date of the notice to the Family specifying the amount owed. Families determined to have misrepresented and/or failed to report income are subject to lease termination

15.11 PAYMENT ALLOCATIONS

Monthly payments made by a resident shall be applied in the following order:

- a) *Security Deposit*
- b) *Maintenance*
- c) *Other Charges*

- d) *Legal Charges*
- e) *Current Rent*
- f) *Delinquent Rent*
- g) *Excess Utilities*

15.12 FAILURE TO REPORT INCOME CHANGES WITH EXTENUATING CIRCUMSTANCES

The Management Director may allow a Family, who fails to report income changes, to enter into a Repayment Agreement under the following circumstances:

1. The failure to report income changes was not an intentional misrepresentation of income; and,
2. The family does not have the funds available to repay the debt in a lump sum; and,
3. The debt is greater than the Family's gross monthly income.

15.13 AUTHORITY ERRORS

The Housing Authority will not calculate retroactive increases if the income change was reported in a timely manner and the Authority failed to make the appropriate adjustment.

16.0 UNIT TRANSFERS

16.1 OBJECTIVES OF THE TRANSFER POLICY

The objectives of the Transfer Policy include the following:

- A. To address emergency situations.
- B. To fully utilize available housing resources while avoiding overcrowding by insuring that each family occupies the appropriate size unit.
- C. To facilitate a relocation when required for modernization or other management purposes.
- D. To facilitate relocation of families with inadequate housing accommodations.
- E. To provide an incentive for families to assist in meeting the St. Clair County Housing Authority's deconcentration goal.
- B. To eliminate vacancy loss and other expense due to unnecessary transfers.

16.2 INELIGIBLE GROUNDS FOR TRANSFER

The St. Clair County Housing Authority shall not approve transfer requests based upon the following:

- A. Environmental factors associated with a development location, neighborhood, and/or community. More specifically, the level of criminal activity or fear of criminal activity within a development, neighborhood, and/or community is not grounds for a transfer.
- B. Disputes with neighbors.

16.3 CATEGORIES OF TRANSFERS

Category 1: Emergency transfers. These transfers are necessary when conditions pose an immediate threat to the life, health, or safety of a family or one of its members. Such situations may involve defects of the unit or the building in which it is located, the health condition of a family member, a hate crime, the safety of witnesses to a crime, or a law enforcement matter particular to the neighborhood.

Category 2: Immediate administrative transfers. These transfers are necessary in order to permit a family needing accessible features to move to a unit with such a feature or to enable modernization work to proceed.

Category 3: Regular administrative transfers. These transfers are made to offer incentives to families willing to help meet certain St. Clair County Housing Authority occupancy goals, to adhere to occupancy standards where the unit size is inappropriate for the size and composition of the family, to allow for non-emergency but medically advisable transfers, and other transfers approved by the St. Clair County Housing Authority when a transfer is the only or best way of solving a serious problem.

16.4 DOCUMENTATION

When the transfer is at the request of the family, the family may be required to provide third party verification of the need for the transfer.

16.5 INCENTIVE TRANSFERS

Transfer requests will be encouraged and approved for families who live in a development where their income category (below or above 30% of area median) predominates and wish to move to a development where their income category does not predominate.

Families living in multifamily developments have the opportunity to transfer to scattered-site housing. Families approved for such transfers will meet the following eligibility criteria:

- A. Have been a resident for three years;
- B. For a minimum of one year, at least one adult family member is enrolled in an economic self-sufficiency program or is working at least thirty-five (35) hours per week, the adult family members are 62 years of age or older or are disabled or are the primary care givers to others with disabilities;
- C. Adult members who are required to perform community service have been current in these responsibilities since the inception of the requirement or for one year which ever is less;
- D. The family is current in the payment of all charges owed the St. Clair County Housing Authority and has not paid late rent for at least one year;
- E. The family passes a current housekeeping inspection and does not have any record of housekeeping problems during the last year;
- F. The family has not materially violated the lease over the past two years by disturbing the peaceful enjoyment of their neighbors, by engaging in criminal or drug-related activity, or by threatening the health or safety of residents or Housing Authority staff.
- G. The family demonstrates the capacity to perform basic home and yard care.

16.6 PROCESSING TRANSFERS

Transfer waiting lists will be maintained by Management District, organized by bedroom size needed and sorted by the above categories and within each category by date and time.

Transfers in category 1 and 2 will be executed ahead of any other families, including those on the applicant waiting list. Transfers in category 1 will be executed ahead of transfers in category 2.

Transfers in category 3 will be executed along with housing applicants for admission at a ratio of one transfer for every nine admissions.

SCCHA specifically reserves the right to suspend transfer activity if occupancy rates fall below 98%

Transfers shall be administered within the development whenever possible. If a unit of appropriate size/design is not contained and/or not expected to be available within the development in which the family resides on a timely basis commensurate with the need for transfer, the transfer shall be considered secondarily within the management district and finally on a PHA-wide basis. Transfers between management districts require the

approval of the Management Director and will only be offered to accommodate Category 1 and 2 transfers, unless there are mitigating circumstances..

16.7 ELIGIBILITY REQUIREMENTS

Families approved for transfers shall meet the following eligibility criteria:

- A. The family must have been in the current unit for at least one year (applicable to Category 3 requests only);
- B. Applicable community service requirements have been met;
- C. The family is current in the payment of all charges owed and has not paid late rent for at least one year;
- D. The family passed the last housekeeping inspection and does not have a record of housekeeping problems during the last year;
- E. The family has not materially violated the lease over the past two years by disturbing the peaceful enjoyment of their neighbors, by engaging in criminal or drug-related activity, or by threatening the health or safety of residents or SCCHA staff.

16.8 COMPLETION OF THE TRANSFER BY THE FAMILY

Upon offer and acceptance of a unit, the family will execute all lease up documents and pay any rent and/or security deposit due within two (2) days of being informed the unit is ready to rent. Residents transferring shall be required to pay the currently required Security Deposit amount if it is more than the deposit they previously paid.

Transfers (i.e. the actual movement of the resident's personal belongings, transfer of utility services, and returning of the keys to the "from" unit) must be fully completed within a maximum seven-day period. When transfers are not fully executed within the seven day period, the resident shall be assessed a daily rental charge equal to the Section 8 Fair Market Rent Limit for the unit size (i.e. number of bedrooms) the resident is transferring from in addition to the resident rent established for the "to" unit.

16.9 REFUSING A TRANSFER

The following is the policy for the rejection of an offer to transfer:

- A. A resident's refusal to transfer to an appropriate sized unit upon the notification of management shall be grounds for lease termination, unless the refusal is based upon verifiable medical reasons or other good cause as determined by management.
- B. If the transfer is being made at the family's request and the rejected offer provides deconcentration incentives, the family will maintain their place on the transfer list and will not otherwise be penalized.

- C. If the transfer is being made at the family's request, the family may, without good cause and without penalty, turn down one offer that does not include deconcentration incentives. After turning down a second such offer without good cause, the family's name will be removed from the transfer list.

16.10 TRANSFER COSTS

A. Unit Preparation Costs

When the family (or others on their behalf) initiate the transfer request, the family must pay prior to the transfer a charge equal to an SCCHA estimate of the cost necessary to make the family's existing unit ready for occupancy. The minimum fee is \$150 and is non-refundable.

B. Moving Costs

The cost of the transfer generally will be borne by the family in the following circumstances:

- a. When the transfer is made at the request of the family or by others on behalf of the family (i.e. by the police);
- b. When the transfer is needed to move the family to an appropriately sized unit, either larger or smaller;
- c. When the transfer is necessitated because a family with disabilities needs the accessible unit into which the transferring family moved (The family without disabilities signed a statement to this effect prior to accepting the accessible unit);
or
- d. When the transfer is needed because action or inaction by the family caused the unit to be unsafe or uninhabitable.

The cost of the transfer will be borne by the SCCHA in the following circumstances:

- a. When the transfer is needed in order to carry out rehabilitation activities; or
- b. When action or inaction by the SCCHA has caused the unit to be unsafe or inhabitable.

The responsibility for moving costs in other circumstances will be determined on a case-by-case basis.

16.11 TRANSFER REQUESTS

A resident may request a transfer at any time by completing a transfer request form. In considering the request, the Management may request a meeting with the resident to

better understand the need for transfer and to explore possible alternatives. Management will review the request in a timely manner and if a meeting is desired, shall contact the resident within ten (10) business days of receipt of the request to schedule a meeting.

Management will approve or deny the transfer request in writing within thirty (30) business days of receiving the request, or holding the meeting, whichever is later.

If the transfer is approved, the family's name will be added to the transfer waiting list.

If the transfer is denied, the denial letter will advise the family of their right to utilize the grievance procedure.

16.12 RIGHT OF THE ST. CLAIR COUNTY HOUSING AUTHORITY IN TRANSFER POLICY

The provisions listed above are to be used as a guide to insure fair and impartial means of assigning units for transfers. It is not intended that this policy will create a property right or any other type of right for a resident to transfer or refuse to transfer.

17.0 INSPECTIONS

17.1 MOVE-IN INSPECTIONS

An authorized representative of the St. Clair County Housing Authority will inspect the premises prior to commencement of occupancy. When possible, the resident is notified of the inspection and is encouraged to attend. A written statement of the condition of the premises will be made, all equipment provided will be noted, and the statement will be signed the SCCHA representative with a copy retained in the resident file and a copy given to the resident. The resident will be advised to carefully review the inspection report, immediately notify management if they disagree with the content of the report, and maintain a copy for future reference because the report establishes the condition of the unit upon move-in and will be the basis for any subsequent damage charges.

17.2 POST MOVE-IN INSPECTIONS

A post move-in inspection of the dwelling unit will be completed within three months after initial occupancy to document proper unit care. The resident shall be given appropriate written notice of the date and time of the inspection, as well as an explanation of the reasons for the inspection. An inspection report shall be completed and signed by the resident and the SCCHA representative. Deficiencies shall be discussed with the resident. If the inspection shows adequate care by the resident, the next inspection will be the annual inspection. If inadequacies on the part of the resident are revealed, further housekeeping inspections as discussed below shall be scheduled.

17.3 ANNUAL INSPECTIONS

The St. Clair County Housing Authority will inspect each public housing unit annually to ensure that each unit meets the applicable housing standards. Work orders will be submitted and completed to correct any deficiencies.

17.4 PREVENTATIVE MAINTENANCE INSPECTIONS

This is generally conducted along with the annual inspection, but may be completed separately. This inspection is intended to keep items in good repair. It checks weatherization; checks the condition of the smoke detectors, water heaters, furnaces, automatic thermostats and water temperatures; checks for leaks; and provides an opportunity to change furnace filters and provide other minor servicing that extends the life of the unit and its equipment.

17.5 SPECIAL INSPECTIONS

A special inspection may be scheduled to enable HUD or others to inspect a sample of the housing stock maintained by the St. Clair County Housing Authority.

17.6 HOUSEKEEPING INSPECTIONS

Generally, at the time of annual inspection, or at other times as necessary, the St. Clair County Housing Authority will conduct a housekeeping inspection to ensure the family is maintaining the unit in a safe and sanitary condition.

17.7 NOTICE OF INSPECTION

For all inspections, except emergency inspections, the St. Clair County Housing Authority will give the resident at least twenty four hour written notice, unless the resident agrees to a shorter notice.

17.8 EMERGENCY INSPECTIONS

If any employee and/or agent of the St. Clair County Housing Authority has reason to believe that an emergency exists within the housing unit, the unit can be entered without notice. The person(s) that enters the unit will leave a written notice to the resident that indicates the date and time the unit was entered and the reason why it was necessary to enter the unit.

17.9 PRE-MOVE-OUT INSPECTIONS

When a resident gives notice that they intend to move, the St. Clair County Housing Authority will upon request of the resident schedule a pre-move-out inspection with the family. The inspection allows the St. Clair County Housing Authority to help the family identify any problems which, if left uncorrected, could lead to vacate charges. This inspection is a courtesy to the family and has been found to be helpful both in reducing

costs to the family and in enabling the St. Clair County Housing Authority to ready units more quickly for the future occupants.

17.10 MOVE-OUT INSPECTIONS

The St. Clair County Housing Authority conducts the move-out inspection after the resident vacates to assess the condition of the unit and determine responsibility for any needed repairs. When possible, the resident is notified of the inspection and is encouraged to be present. This inspection becomes the basis for any claims that may be assessed against the security deposit.

18.0 PET POLICY

Residents have the right to have common household pets subject to the terms and conditions of SCCHA's established Pet Policy (Appendix J).

19.0 REPAYMENT AGREEMENTS

When a resident becomes delinquent in the amount owed the St. Clair County Housing Authority and is unable to pay the balance in full, the resident may request that the St. Clair County Housing Authority allow them to enter into a Repayment Agreement. The St. Clair County Housing Authority has the sole discretion of whether to accept such an agreement. Families impacted by the minimum rent provisions of this policy who have had their rent temporarily abated will be afforded a repayment agreement opportunity upon the reinstatement of the minimum rent. All Repayment Agreements must assure that the full payment is made within a period not to exceed twelve (12) months, unless a longer period is determined appropriate by the Management Director. All Repayment Agreements must be in writing and signed by both parties. There shall be a \$25 administrative charge for each repayment agreement, which must be paid at the time of execution. In addition, repayment agreements resulting from resident caused damages or the resident's failure to properly report income, require an initial down-payment equal to 20%. The down-payment must be paid at the time of execution of the repayment agreement. Failure to comply with the Repayment Agreement terms may subject the Resident to eviction procedures.

20.0 TERMINATION

20.1 TERMINATION BY RESIDENT

The resident may terminate the lease at any time upon submitting a 30-day written notice. If the resident vacates prior to the end of the thirty (30) days, they will be responsible for rent through the end of the notice period or until the unit is re-rented, whichever occurs

first. If the resident's monthly rent is less than \$100 and less than a 30-day written is given a \$100 cancellation fee shall be assessed in addition to the prorated rent amount.

20.2 TERMINATION BY THE HOUSING AUTHORITY

The St. Clair County Housing Authority after 10/1/2000 will not renew the lease of any family that is not in compliance with the community service requirement or an approved Agreement to Cure. If they do not voluntarily leave the property, eviction proceedings will begin. Enforcement of the Community Service Requirement is suspended through 9/30/03 by Congressional action.

The St. Clair County Housing Authority will terminate the lease for serious or repeated violations of material lease terms. Such violations include but are not limited to the following:

- A. Nonpayment of rent or other charges;
- B. A history of late rental payments;
- C. Failure to provide timely and accurate information regarding family composition, income circumstances, or other information related to eligibility or rent;
- D. Failure to allow inspection of the unit;
- E. Failure to maintain the unit in a safe and sanitary manner;
- F. Assignment or subletting of the premises;
- G. Use of the premises for purposes other than as a dwelling unit (other than for housing authority approved resident businesses) and/or their primary dwelling;
- H. Destruction of property;
- I. Acts of destruction, defacement, or removal of any part of the premises or failure to cause guests to refrain from such acts;
- J. Any criminal activity on the property or drug-related criminal activity on or off the premises. This includes but is not limited to the manufacture of methamphetamine on the premises of the St. Clair County Housing Authority;
- K. Non-compliance with Non-Citizen Rule requirements;
- L. Permitting persons not on the lease to reside in the unit more than ten (10) consecutive days in any one-month or thirty (30) accumulative days within the last 12 months.

M. Other good cause.

The St. Clair County Housing Authority will take immediate action to evict any household that includes an individual who is subject to a lifetime registration requirement under a State sex offender registration program.

20.3 ABANDONMENT

A. Dwelling Unit

The St. Clair County Housing Authority will consider a unit to be abandoned when a resident has both fallen behind in rent **AND** has clearly indicated by words or actions an intention not to continue living in the unit (i.e. disconnected utilities, most personal property removed from the unit, resident being absent from the unit, etc.).

When a unit has been declared abandoned, Management shall post on the residence and mail to the person the resident has identified as an emergency contact a “Notice of Intention To Claim Abandonment.” The Abandonment Notice shall indicate the reasons Management believes the property to have been abandoned and shall provide the Resident a minimum ten day period in which to contact Management to refute the abandonment declaration. If no contact is made within the specified time period, Management shall have the right to regain control of the premises.

B. Personal Property

Personal Property of the resident left in the unit after the resident has vacated the unit as a result of:

- a) Lease termination as prescribed in Section 18;
- b) Hazards and/or defects as defined in lease agreement;
- c) The death of the resident when no known survivors and/or heirs can be located; or;
- d) Management declaration of abandonment as discussed in paragraph A above, shall become the property of St. Clair County Housing Authority. Before disposing of the property, SCCHA shall give the resident written notice to remove the property. This notice will be delivered to the resident at the leased premises in accordance with the applicable provisions in the lease, if a new residence or mailing address is unknown. Any expenses incurred by Management in disposing of abandoned personal property shall be charged to the Resident’s account. Any net proceeds from the sale of such property shall be credited to the resident’s account.

20.4 RETURN OF SECURITY DEPOSIT

After a family moves out, the St. Clair County Housing Authority will within 30 days return the security deposit or give the family a written statement of why all or part of the security deposit is being kept. The rental unit must be restored to the same conditions as

when the family moved in, except for normal wear and tear. Deposits will not be used to cover normal wear and tear or damage that existed when the family moved in.

The St. Clair County Housing Authority will be considered in compliance with the above if the required payment, statement, or both, are deposited in the U.S. mail with first class postage paid within 30 days.

21.0 SERVICE CHARGES

Consistent with HUD guidelines, it is SCCHA's policy to charge residents for repair work needed as a result of resident neglect, damage, or other factors that exceed normal wear and tear taking into consideration the length of occupancy and other relevant factors. The Service Charge Policy is included as Appendix K.

22.0 COLLECTION PROCEDURES

The procedure used to collect monies due by residents, including rent and all other charges, shall be consistent with SCCHA's established Collection Policy, which appears as Appendix #L.

23.0 GRIEVANCE POLICY

Applicants and Residents have the right to have any adverse action related to their application or continued occupancy reviewed according to the terms and conditions of SCCHA's established Grievance Policy (Appendix M).

24.0 FIRE LOSS RE-HOUSING POLICY

To guide decisions regarding the re-housing of residents when the leased unit has been damaged by fire resulting from tenant accident or neglect, SCCHA has adopted a Fire Loss Re-housing Policy (Appendix P)

25.0 SMOKING POLICY FOR HI-RISE BUILDINGS

Due to the increasing sensitivity to cigarette smoke among senior residents and given the obvious health concerns, SCCHA has adopted a policy to govern cigarette smoking in its three Hi-rise Senior Buildings. (See Appendix Q)

26.0

APPENDIX SUMMARY

A – GLOSSARY

B – ACRONYMS

C - LOW AND VERY LOW INCOME AMOUNTS

D – INCOME DECONCENTRATION WORKSHEET

E – SECURITY DEPOSIT REQUIREMENTS

F- LEASE AGREEMENT

G – BAN AND BAR POLICY

H – HUD’S GUIDELINES FOR PROJECTING ANNUAL INCOME USING UIV

I – HUD’S UPFRONT INCOME VERIFICATION (UIV) SYSTEM SECURITY PROCEDURES

J – FLAT RENT AND CEILING RENT SCHEDULES

K – UTILITY ALLOWANCES

L - PET POLICY, PET AGREEMENT AND APPLICATION/PERMIT FORM

M- SERVICE CHARGE POLICY

N – COLLECTION POLICY

O – GRIEVANCE POLICY

P – FIRE LOSS RE-HOUSING POLICY

Q – SMOKING POLICY FOR HI-RISE BUILDINGS

APPENDIX A

GLOSSARY

50058 Form: The HUD form that housing authorities are required to complete for each assisted household in public housing to record information used in the certification and re-certification process and, at the option of the housing authority, for interim reexaminations.

1937 Housing Act: The United States Housing Act of 1937 (42 U.S.C. 1437 et seq.) (24 CFR 5.100)

Adjusted Annual Income: The amount of household income, after deductions for specified allowances, on which resident rent is based. (24 CFR 5.611)

Adult: A household member who is 18 years or older or who is the head of the household, or spouse, or co-head.

Allowances: Amounts deducted from the household's annual income in determining adjusted annual income (the income amount used in the rent calculation). Allowances are given for elderly families, dependents, medical expenses for elderly families, disability expenses, and child care expenses for children under 13 years of age. Other allowance can be given at the discretion of the housing authority.

Annual Contributions Contract (ACC): The written contract between HUD and a housing authority under which HUD agrees to provide funding for a program under the 1937 Act, and the housing authority agrees to comply with HUD requirements for the program. (24 CFR 5.403)

Annual Income: All amounts, monetary or not, that:

- A. Go to (or on behalf of) the family head or spouse (even if temporarily absent) or to any other family member; or
- B. Are anticipated to be received from a source outside the family during the 12-month period following admission or annual reexamination effective date; and
- C. Are not specifically excluded from annual income.

Annual Income also includes amounts derived (during the 12-month period) from assets to which any member of the family has access. (1937 Housing Act; 24 CFR 5.609)

Applicant (applicant family): A person or family that has applied for admission to a program but is not yet a participant in the program. (24 CFR 5.403)

As-Paid States: States where the welfare agency adjusts the shelter and utility component of the welfare grant in accordance with actual housing costs. Currently, the four as-paid States are New Hampshire, New York, Oregon, and Vermont.

Assets: The value of equity in savings, checking, IRA and Keogh accounts, real property, stocks, bonds, and other forms of capital investment. The value of necessary items of personal property such as furniture and automobiles are not counted as assets. (Also see "net family assets.")

Asset Income: Income received from assets held by family members. If assets total more than \$5,000, income from the assets is "imputed" and the greater of actual asset income and imputed asset income is counted in annual income. (See "imputed asset income" below.)

Ceiling Rent: Maximum rent allowed for some units in public housing projects.

Certification: The examination of a household's income, expenses, and family composition to determine the family's eligibility for program participation and to calculate the family's share of rent.

Child: For purposes of citizenship regulations, a member of the family other than the family head or spouse who is under 18 years of age. (24 CFR 5.504(b))

Child Care Expenses: Amounts anticipated to be paid by the family for the care of children under 13 years of age during the period for which annual income is computed, but only where such care is necessary to enable a family member to actively seek employment, be gainfully employed, or to further his or her education and only to the extent such amounts are not reimbursed. The amount deducted shall reflect reasonable charges for child care. In the case of child care necessary to permit employment, the amount deducted shall not exceed the amount of employment income that is included in annual income. (24 CFR 5.603(d))

Citizen: A citizen or national of the United States. (24 CFR 5.504(b))

Consent Form: Any consent form approved by HUD to be signed by assistance applicants and participants for the purpose of obtaining income information from employers and SWICAs, return information from the Social Security Administration, and return information for unearned income from the Internal Revenue Service. The consent forms may authorize the collection of other information from assistance applicants or participant to determine eligibility or level of benefits. (24 CFR 5.214)

Decent, Safe, and Sanitary: Housing is decent, safe, and sanitary if it satisfies the applicable housing quality standards.

Department: The Department of Housing and Urban Development. (24 CFR 5.100)

Dependent: A member of the family (except foster children and foster adults), other than the family head or spouse, who is under 18 years of age or is a person with a disability or is a full-time student. (24 CFR 5.603(d))

Dependent Allowance: An amount, equal to \$480 multiplied by the number of dependents, that is deducted from the household's annual income in determining adjusted annual income.

Disability Assistance Expenses: Reasonable expenses that are anticipated, during the period for which annual income is computed, for attendant care and auxiliary apparatus for a disabled family member and that are necessary to enable a family member (including the disabled member) to be employed, provided that the expenses are neither paid to a member of the family nor reimbursed by an outside source. (24 CFR 5.603(d))

Disability Assistance Expense Allowance: In determining adjusted annual income, the amount of disability assistance expenses deducted from annual income for families with a disabled household member.

Disabled Family: A family whose head, spouse, or sole member is a person with disabilities; two or more persons with disabilities living together; or one or more persons with disabilities living with one or more live-in aides. (24 CFR 5.403(b)) (Also see "person with disabilities.")

Disabled Person: See "person with disabilities."

Displaced Family: A family in which each member, or whose sole member, is a person displaced by governmental action (such as urban renewal), or a person whose dwelling has been extensively damaged or destroyed as a result of a disaster declared or otherwise formally recognized pursuant to Federal disaster relief laws. (24 CFR 5.403(b))

Displaced Person: A person displaced by governmental action or a person whose dwelling has been extensively damaged or destroyed as a result of a disaster declared or otherwise formally recognized pursuant to Federal disaster relief laws. *[1937 Act]*

Drug-Related Criminal Activity: Drug trafficking or the illegal use, or possession for personal use, of a controlled substance as defined in Section 102 of the Controlled Substances Act (21 U.S.C. 802).

Elderly Family: A family whose head, spouse, or sole member is a person who is at least 62 years of age; two or more persons who are at least 62 years of age living together; or one or more persons who are at least 62 years of age living with one or more live-in aides. (24 CFR 5.403)

Elderly Family Allowance: For elderly families, an allowance of \$400 is deducted from the household's annual income in determining adjusted annual income.

Elderly Person: A person who is at least 62 years of age. (1937 Housing Act)

Extremely low-income families: Those families whose incomes do not exceed 30% of the median income for the area, as determined by the Secretary with adjustments for smaller and larger families.

Fair Housing Act: Title VIII of the Civil Rights Act of 1968, as amended by the Fair Housing Amendments Act of 1988 (42 U.S.C. 3601 et seq.). (24 CFR 5.100)

Family includes but is not limited to:

- A. A family with or without children;
- B. An elderly family;
- C. A near-elderly family;
- D. A disabled family;
- E. A displaced family;
- F. The remaining member of a resident family; and
- G. A single person who is not an elderly or displaced person, a person with disabilities, or the remaining member of a resident family. (24 CFR 5.403)

Family Members: All members of the household other than live-in aides, foster children, and foster adults. All family members permanently reside in the unit, though they may be temporarily absent. All family members are listed on the lease.

Family Self-Sufficiency Program (FSS Program): The program established by a housing authority to promote self-sufficiency among participating families, including the coordination of supportive services. (24 CFR 984.103(b))

Flat Rent: A rent amount the family may choose to pay in lieu of having their rent determined under the formula method. The flat rent is established by the housing authority set at the lesser of the market value for the unit or the cost to operate the unit. Families selecting the flat rent option have their income evaluated once every three years, rather than annually.

Formula Method: A means of calculating a family's rent based on 10% of their monthly income, 30% of their adjusted monthly income, the welfare rent, or the minimum rent. Under the formula method, rents may be capped by a ceiling rent. Under this method, the family's income is evaluated at least annually.

Full-Time Student: A person who is carrying a subject load that is considered full-time for day students under the standards and practices of the educational institution attended. An educational institution includes a vocational school with a diploma or certificate program, as well as an institution offering a college degree. (24 CFR 5.603(d))

Head of Household: The adult member of the family who is the head of the household for purposes of determining income eligibility and rent. (24 CFR 5.504(b))

Household Members: All members of the household including members of the family, live-in aides, foster children, and foster adults. All household members are listed on the lease, and no one other than household members are listed on the lease.

Housing Assistance Plan: A housing plan that is submitted by a unit of general local government and approved by HUD as being acceptable under the standards of 24 CFR 570.

Imputed Income: For households with net family assets of more than \$5,000, the amount calculated by multiplying net family assets by a HUD-specified percentage. If imputed income is more than actual income from assets, the imputed amount is used as income from assets in determining annual income.

In-Kind Payments: Contributions other than cash made to the family or to a family member in exchange for services provided or for the general support of the family (e.g., groceries provided on a weekly basis, baby sitting provided on a regular basis).

Interim (examination): A reexamination of a family income, expenses, and household composition conducted between the regular annual recertifications when a change in a household's circumstances warrants such a reexamination.

Live-In Aide: A person who resides with one or more elderly persons, near-elderly persons, or persons with disabilities and who:

- A. Is determined to be essential to the care and well-being of the persons;
- B. Is not obligated for the support of the persons; and
- C. Would not be living in the unit except to provide the necessary supportive services. (24 CFR 5.403(b))

Low-Income Families: Those families whose incomes do not exceed 80% of the median income for the area, as determined by the Secretary with adjustments for smaller and larger families, except that the Secretary may establish income ceilings higher or lower than 80% of the median for the area on the basis of the Secretary's findings that such variations are necessary because of prevailing levels of construction costs or unusually high or low family incomes. (1937Act)

Medical Expenses: Medical expenses (of all family members of an elderly or disabled family), including medical insurance premiums, that are anticipated during the period for which annual income is computed and that are not covered by insurance. (24 CFR 5.603(d)). These expenses include, but are not limited to, prescription and non-prescription drugs, costs for doctors, dentists, therapists, medical facilities, care for a service animals, transportation for medical purposes.

Mixed Family: A family whose members include those with citizenship or eligible immigration status and those without citizenship or eligible immigration status. (24 CFR 5.504(b))

Monthly Adjusted Income: One twelfth of adjusted income. (24 CFR 5.603(d))

Monthly Income: One twelfth of annual income. (24 CFR 5.603(d))

National: A person who owes permanent allegiance to the United States, for example, as a result of birth in a United States territory or possession. (24 CFR 5.504(b))

Near-Elderly Family: A family whose head, spouse, or sole member is a person who is at least 50 years of age but below the age of 62; two or more persons, who are at least 50 years of age but below the age of 62, living together; or one or more persons who are at least 50 years of age but below the age of 62 living with one or more live-in aides. (24 CFR 5.403(b))

Net Family Assets:

- A. Net cash value after deducting reasonable costs that would be incurred in disposing of real property, savings, stocks, bonds, and other forms of capital investment, excluding interests in Indian trust land and excluding equity accounts in HUD homeownership programs. The value of necessary items of personal property such as furniture and automobiles shall be excluded.
- B. In cases where a trust fund has been established and the trust is not revocable by, or under the control of, any member of the family or household, the value of the trust fund will not be considered an asset so long as the fund continues to be held in trust. Any income distributed from the trust fund shall be counted when determining annual income.
- C. In determining net family assets, housing authorities or owners, as applicable, shall include the value of any business or family assets disposed of by an applicant or resident for less than fair market value (including a disposition in trust, but not in a foreclosure or bankruptcy sale) during the two years preceding the date of application for the program or reexamination, as applicable, in excess of the consideration received therefor. In the case of a disposition as part of a separation or divorce settlement, the disposition will not be considered to be for less than fair market value if the applicant or resident receives important consideration not measurable in dollar terms. (24 CFR 5.603(d))

Non-Citizen: A person who is neither a citizen nor national of the United States. (24 CFR 5.504(b))

Occupancy Standards: The standards that a housing authority establishes for determining the appropriate number of bedrooms needed to house families of different sizes or composition.

Person with Disabilities: A person who:

- A. Has a disability as defined in Section 223 of the Social Security Act, which states:

"Inability to engage in any substantial, gainful activity by reason of any medically determinable physical or mental impairment that can be expected to result in death or that has lasted or can be expected to last for a continuous period of not less than 12 months, or

In the case of an individual who attained the age of 55 and is blind and unable by reason of such blindness to engage in substantial, gainful activity requiring skills or ability comparable to those of any gainful activity in which he has previously engaged with some regularity and over a substantial period of time."

- B. Is determined, pursuant to regulations issued by the Secretary, to have a physical, mental, or emotional impairment that:

1. Is expected to be of long-continued and indefinite duration;
2. Substantially impedes his or her ability to live independently; and
3. Is of such a nature that such ability could be improved by more suitable housing conditions, or

- C. Has a developmental disability as defined in Section 102(7) of the Developmental Disabilities Assistance and Bill of Rights Act, which states:

"Severe chronic disability that:

1. Is attributable to a mental or physical impairment or combination of mental and physical impairments;
2. Is manifested before the person attains age 22;
3. Is likely to continue indefinitely;
4. Results in substantial functional limitation in three or more of the following areas of major life activity: (1) self care, (2) receptive and responsive language, (3) learning, (4) mobility, (e) self-direction, (6) capacity for independent living, and (7) economic self-sufficiency; and
5. Reflects the person's need for a combination and sequence of special, interdisciplinary, or generic care, treatment, or other services that are of lifelong or extended duration and are individually planned and coordinated."

This definition does not exclude persons who have the disease of acquired immunodeficiency syndrome or any conditions arising from the etiologic agent for acquired immunodeficiency syndrome. (1937 Act)

No individual shall be considered to be a person with disabilities for purposes of eligibility solely based on any drug or alcohol dependence.

Proration of Assistance: The reduction in a family's housing assistance payment to reflect the proportion of family members in a mixed family who are eligible for assistance. (24 CFR 5.520)

Public Housing Agency (PHA): Any State, county, municipality, or other governmental entity or public body (or agency or instrumentality thereof) which is authorized to engage in or assist in the development or operation of low-income housing under the 1937 Housing Act. (24 CFR 5.100)

Recertification: The annual reexamination of a family's income, expenses, and composition to determine the family's rent.

Remaining Member of a Resident Family: A member of the family listed on the lease who continues to live in the public housing dwelling after all other family members have left. (Handbook 7565.1 REV-2, 3-5b.)

Self-Declaration: A type of verification statement by the resident as to the amount and source of income, expenses, or family composition. Self-declaration is acceptable verification only when third-party verification or documentation cannot be obtained.

Shelter Allowance: That portion of a welfare benefit (e.g., TANF) that the welfare agency designates to be used for rent and utilities.

Single Person: Someone living alone or intending to live alone who does not qualify as an elderly family, a person with disabilities, a displaced person, or the remaining member of a resident family. (Public Housing: Handbook 7465.1 REV-2, 3-5)

State Wage Information Collection Agency (SWICA): The State agency receiving quarterly wage reports from employers in the State or an alternative system that has been determined by the Secretary of Labor to be as effective and timely in providing employment-related income and eligibility information. (24 CFR 5.214)

Temporary Assistance to Needy Families (TANF): The program that replaced the Assistance to Families with Dependent Children (AFDC) that provides financial assistance to needy families who meet program eligibility criteria. Benefits are limited to a specified time period.

Resident: The person or family renting or occupying an assisted dwelling unit. (24 CFR 5.504(b))

Resident Rent: The amount payable monthly by the family as rent to the housing authority. Where all utilities (except telephone) and other essential housing services are supplied by the housing authority or owner, resident rent equals total resident payment. Where some or all utilities (except telephone) and other essential housing services are supplied by the housing authority and the cost thereof is not included in the amount paid as rent, resident rent equals total resident payment less the utility allowance. (24 CFR 5.603(d))

Third-Party (verification): Written or oral confirmation of a family's income, expenses, or household composition provided by a source outside the household.

Total Resident Payment (TTP):

- A. Total resident payment for families whose initial lease is effective on or after August 1, 1982:
 - 1. Total resident payment is the amount calculated under Section 3(a)(1) of the 1937 Act which is the higher of :
 - a. 30% of the family's monthly adjusted income;
 - b. 10% of the family's monthly income; or
 - c. If the family is receiving payments for welfare assistance from a public agency and a part of such payments, adjusted in accordance with the family's actual housing costs, is specifically designated by such agency to meet the family's housing costs, the portion of such payments which is so designated.

If the family's welfare assistance is ratably reduced from the standard of need by applying a percentage, the amount calculated under section 3(a)(1) shall be the amount resulting from one application of the percentage.
 - 2. Total resident payment for families residing in public housing does not include charges for excess utility consumption or other miscellaneous charges.
- B. Total resident payment for families residing in public housing whose initial lease was effective before August 1, 1982: Paragraphs (b) and (c) of 24 CFR 913.107, as it existed immediately before November 18, 1996), will continue to govern the total resident payment of families, under a public housing program, whose initial lease was effective before August 1, 1982.

Utility Allowance: If the cost of utilities (except telephone) and other housing services for an assisted unit is not included in the resident rent but is the responsibility of the family occupying the unit, an amount equal to the estimate made by a housing authority of the monthly cost of a reasonable consumption of such utilities and other services for the unit by an energy-conservative household of modest circumstances consistent with the requirements of a safe, sanitary, and healthful living environment. (24 CFR 5.603)

Utility Reimbursement: The amount, if any, by which the utility allowance for the unit, if applicable, exceeds the total resident payment for the family occupying the unit. (24 CFR 5.603)

Very Low-Income Families: Low-income families whose incomes do not exceed 50% of the median family income for the area, as determined by the Secretary with adjustments for smaller and larger families, except that the Secretary may establish income ceilings higher or lower than 50% of the median for the areas on the basis of the Secretary's findings that such variations are necessary because of unusually high or low family incomes. Such ceilings shall be established in consultation with the Secretary of Agriculture for any rural area, as defined in Section 520 of the Housing Act of 1949, taking into account the subsidy characteristics and types of programs to which such ceilings apply. (1937 Act)

Welfare Assistance: Welfare or other payments to families or individuals, based on need, that are made under programs funded by Federal, State or local governments. (24 CFR 5.603(d))

Welfare Rent: In "as-paid" welfare programs, the amount of the welfare benefit designated for shelter and utilities.

APPENDIX B

ACRONYMS

ACC	Annual Contributions Contract
CFR	Code of Federal Regulations
FSS	Family Self Sufficiency (program)
HCDA	Housing and Community Development Act
HQS	Housing Quality Standards
HUD	Department of Housing and Urban Development
INS	(U.S.) Immigration and Naturalization Service
NAHA	(Cranston-Gonzalez) National Affordable Housing Act
NOFA	Notice of Funding Availability
OMB	(U.S.) Office of Management and Budget
PHA	Public Housing Agency
QHWR	Quality Housing and Work Responsibility Act of 1998
SSA	Social Security Administration
TTP	Total Resident Payment

APPENDIX C

LOW AND VERY LOW INCOME AMOUNTS

EFFECTIVE 2/1/02

<u># OF PERSONS</u>	<u>30% OF MEDIAN</u>	<u>VERY LOW INCOME</u>	<u>LOW INCOME</u>
1	\$12,900	\$21,500	\$34,400
2	\$14,750	\$24,550	\$39,300
3	\$16,600	\$27,650	\$44,200
4	\$18,400	\$30,700	\$49,100
5	\$19,900	\$33,150	\$53,050
6	\$21,350	\$35,600	\$57,000
7	\$22,850	\$38,050	\$60,900
8	\$24,300	\$40,500	\$64,850

APPENDIX E

SECURITY DEPOSITS

The following Security Deposits are required to be paid by all tenants at the time a Lease Agreement is signed, and prior to moving in, unless other arrangements are approved by SCCHA.

All units (except single family houses)	Greater of \$200.00 or Net Tenant Payment (one months rent)
Single family houses	Greater of \$300.00 or Net Tenant Payment (one months rent)
Pet Deposit – Elderly	\$100.00
Pet Deposit – Family	\$200.00

Appendix

Income Limits and Deconcentration Worksheet

Development Name	Number of Units Under ACC	Number of Occupied Units	Number of Units Occupied by Very Poor Families	% Occupied by Very Poor Families

%Very Poor in

Census Tract

Target Number

Number Needed of below 30% of median area income

Number Needed above 30% of median area income

Waiting list number of families Appendix 2

Annual Statement/Performance and Evaluation Report **PAGE 1**
Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) Part I: Summary

PHA Name: St. Clair County Housing Authority	Grant Type and Number Capital Fund Program Grant No: IL60P030501-05 Replacement Housing Factor Grant No:	Federal FY of Grant: 2005
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Original Annual Statement
 Reserve for Disasters/ Emergencies
 Revised Annual Statement (revision no:)
 Performance and Evaluation Report for Period Ending:
 Final Performance and Evaluation Report

Line No.	Summary by Development Account	Total Estimated Cost		Total Actual Cost	
		Original	Revised	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations				
3	1408 Management Improvements	136,500			
4	1410 Administration	284,136			
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs	80,000			
8	1440 Site Acquisition				
9	1450 Site Improvement	248,000			
10	1460 Dwelling Structures	922,498			
11	1465.1 Dwelling Equipment— Nonexpendable				
12	1470 Nondwelling Structures	5,000			
13	1475 Nondwelling Equipment	77,500			
14	1485 Demolition	0			
15	1490 Replacement Reserve	0			
16	1492 Moving to Work Demonstration	0			
17	1495.1 Relocation Costs	0			
	SIGNATURE PAGE 2				

Annual Statement/Performance and Evaluation Report **PAGE 2**
Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) Part I: Summary

PHA Name: St. Clair County Housing Authority	Grant Type and Number Capital Fund Program Grant No: IL60P030501-05 Replacement Housing Factor Grant No:	Federal FY of Grant: 2005
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Original Annual Statement **Reserve for Disasters/ Emergencies** **Revised Annual Statement (revision no:)**
 Performance and Evaluation Report for Period Ending: **Final Performance and Evaluation Report**

Line No.	Summary by Development Account	Total Estimated Cost		Total Actual Cost	
		Original	Revised	Obligated	Expended
18	1499 Development Activities	0			
19	1501 Collaterization or Debt Service	0			
20	1502 Contingency	30,116			
21	Amount of Annual Grant: (sum of lines 2 – 20)	1,783,750			
22	Amount of line 21 Related to LBP Activities	0			
23	Amount of line 21 Related to Section 504 compliance	0			
24	Amount of line 21 Related to Security – Soft Costs	0			
25	Amount of Line 21 Related to Security – Hard Costs	0			
26	Amount of line 21 Related to Energy Conservation Measures	0			

Signature of Executive Director _____	Date _____	Signature of Public Housing Official _____	Date _____
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Annual Statement/Performance and Evaluation Report
Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)
Part II: Supporting Pages

PHA Name: St. Clair County Housing Authority		Grant Type and Number Capital Fund Program Grant No: IL60P030501-05 Replacement Housing Factor Grant No:				Federal FY of Grant: 2005		
Development Number Name/HA-Wide Activities	General Description of Major Work Categories	Dev. Acct No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised	Funds Obligated	Funds Expended	
IL30-01 Brooklyn	Building Rehabilitation	1460	18	807,498				
IL30-03 Dupo	Site Improvements	1450	2	75,000				
IL30-06 Centreville	Site Improvements	1450	1	25,000				
	Tree Removal	1450	1	15,000				
	Exterior Improvements	1460	1	35,000				
IL30-08 Centreville	Site Improvements	1450	1	25,000				
	Bath/Washer Dryer Hook-ups	1460	12	80,000				
IL30-16 Belleville	Parking lot/retaining wall rehab.	1450	1	108,000				
	Vehicles	1475	5	60,000				
	Building Acquisition/Demolition	1470	1	5,000				
	Contingency	1502		30,116				

Annual Statement/Performance and Evaluation Report
Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)
Part II: Supporting Pages

PHA Name: St. Clair County Housing Authority		Grant Type and Number Capital Fund Program Grant No: IL60P030501-05 Replacement Housing Factor Grant No:				Federal FY of Grant: 2005		
Development Number Name/HA-Wide Activities	General Description of Major Work Categories	Dev. Acct No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised	Funds Obligated	Funds Expended	
HA Wide	ADMINISTRATIVE COSTS		TOTAL	284,136				
	Director	1410	1	100,140				
	Construction Manager	1410	1	72,765				
	Specialist	1410	1	53,409				
	Modernization Manager	1410	1	57,822				
	COST ALLOCATION METHODOLOGY							
	All administrative costs associated with the Capital Improvements Fund will be compiled using time sheets and charged to the CIF. Benefits on the salary expenses will also be charged to the CIF.							
	Positions as noted in the Plan will also be charged to the CIF budget and the appropriate allocation will be made in the operating budget.							
	All positions shown will be charged at 100%. CIF administrative expenses will be designated as noted above. If further information is required, contact Tony L. Vecera, Technical Services Director. A portion of salaries will be utilized for in-house A&E including inspections in lieu of contracting for such services.							

Annual Statement/Performance and Evaluation Report
Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)
Part II: Supporting Pages

PHA Name: St. Clair County Housing Authority		Grant Type and Number Capital Fund Program Grant No: IL60P030501-05 Replacement Housing Factor Grant No:				Federal FY of Grant: 2005		
Development Number Name/HA-Wide Activities	General Description of Major Work Categories	Dev. Acct No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised	Funds Obligated	Funds Expended	
HA Wide	Management staff professional development	1408		6,000				
Management	Technical services staff professional development	1408		6,000				
Improvements	Service coordination & support activities	1408		20,000				
	Economic development	1408		15,000				
	Family self-sufficiency	1408		35,000				
	Resident council development & training	1408		12,000				
	Drug elimination program	1408		40,000				
	Computer software	1408		2,500				
	Computers & related equipment	1475		17,500				
HA Wide	Architect & Engineering Services	1430		80,000				

Annual Statement/Performance and Evaluation Report
Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)
Part III: Implementation Schedule

PHA Name: St. Clair County HA	Grant Type and Number Capital Fund Program No: IL06P030501-05 Replacement Housing Factor No:	Federal FY of Grant: 2005
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Development Number Name/HA-Wide Activities	All Fund Obligated (Quarter Ending Date)			All Funds Expended (Quarter Ending Date)			Reasons for Revised Target Dates
	Original	Revised	Actual	Original	Revised	Actual	
IL30-01 Brooklyn	09/07			09/08			
IL30-03 Dupo	09/07			09/08			
IL30-06 Centreville	09/07			09/08			
IL30-08 Centreville	09/07			09/08			
IL30-16 Belleville	09/07			09/08			
HA Wide	09/07			09/08			

Signature of Executive Director	Date	Signature of Public Housing Official	Date
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Capital Fund Program Five-Year Action Plan

Part I: Summary

PHA Name: St. Clair County Housing Authority		<input checked="" type="checkbox"/> Original 5-Year Plan <input type="checkbox"/> Revision No:			
Development Number/Name/HA- Wide	Year 1	Work Statement for Year 2 FFY Grant: 501-06 PHA FY: 2006	Work Statement for Year 3 FFY Grant: 501-07 PHA FY: 2007	Work Statement for Year 4 FFY Grant: 501-08 PHA FY: 2008	Work Statement for Year 5 FFY Grant: 501-09 PHA FY: 2009
IL30-01 Brooklyn	Annual Statement	1,120,614	530,116	0	351,114
IL30-05 Smithton		0	0	5,000	0
IL30-06 Centreville		15,000	100,000	877,000	3,500
IL30-06/8/10 Centreville		0	0	0	100,000
IL30-08 Centreville		0	120,000	25,000	0
IL30-11 Alorton		0	0	200,000	0
IL30-12 Brooklyn		0	0	0	100,000
IL30-13 New Athens		0	0	0	203,000
IL30-16 Belleville		60,000	0	82,000	10,000
IL30-21 New Athens		0	0	0	343,000
IL30-22 Millstadt		10,000	0	0	240,000
IL30-27 Belleville		0	506,000	0	20,000
HA wide Mgmt. Impv.		154,000	154,000	154,000	154,000
HA wide Admin.		284,136	284,136	284,136	284,136
HA Wide A&E		80,000	80,000	80,000	80,000
HA wide energy audit		0	0	0	15,000
HA wide fire protectn		0	0	0	50,000
Contingency		60,000	9,498	61,614	0
CFP Funds Listed for 5-year planning		1,786,253	1,786,254	1,771,255	1,956,256
Repl.Hous.Factor Funds					

Note: Administration may increase yearly with Board approved cost of living increases.

Capital Fund Program Five-Year Action Plan
Part II: Supporting Pages—Work Activities

Activities for Year 1	Activities for Year : <u>2</u> FFY Grant: 2006 PHA FY: 2006			Activities for Year: <u>3</u> FFY Grant: 2007 PHA FY: 2007		
	Development Name/Number	Major Work Categories	Estimated Cost	Development Name/Number	Major Work Categories	Estimated Cost
See Annual Statement	IL30-01 Brooklyn	Building Rehabilitation	1,120,614	IL30-01 Brooklyn	HVAC	530,116
	IL30-06 Centreville	Parking Rehabilitation	15,000	IL30-06 Centreville	Wall/Attic Installation	100,000
				IL30-08 Centreville	Wall/Attic insulation	120,000
	IL30-16 Belleville	Vehicle Replacement	60,000			
	IL30-22 Millstadt	Parking Rehabilitation	10,000			
		Contingency	60,000			
				IL30-27 Belleville	HVAC Replacement	280,000
					Flooring	130,000
					Wall Repair	96,000
					Contingency	9,498
	Total CFP Estimated Cost					

**Capital Fund Program Five-Year Action Plan
Part II: Supporting Pages—Work Activities**

Activities for Year 1	Activities for Year : <u>2</u> FFY Grant: 2006 PHA FY: 2006			Activities for Year: <u>3</u> FFY Grant: 2007 PHA FY: 2007		
	Development Name/Number	Major Work Categories	Estimated Cost	Development Name/Number	Major Work Categories	Estimated Cost
See	HA Wide	Management Impv.	154,000	HA Wide	Management Impv.	154,000
Annual	HA Wide	Administration	284,136	HA Wide	Administration	284,136
Statement	HA Wide	Architect & Engineer	80,000	HA Wide	Architect & Engineer	80,000
Total CFP Estimated Cost						

**Capital Fund Program Five-Year Action Plan
Part II: Supporting Pages—Work Activities**

Activities for Year :__4__ FFY Grant: 2008 PHA FY: 2008			Activities for Year: 5 FFY Grant: 2009 PHA FY: 2009		
Development Name/Number	Major Work Categories	Estimated Cost	Development Name/Number	Major Work Categories	Estimated Cost
			IL30-01 Brooklyn	Kitchen & Bathrooms	351,114
IL30-05 Smithton	Interior Lighting	5,000			
IL30-06 Centreville	HVAC/Mech Rooms	852,000	IL30-06 Centreville	Roofing	3,500
	Site Impv & Streets	25,000			
			IL30-06/08/10 Centreville	Storm water drainage, pump station & site	100,000
IL30-08 Centreville	Site Impv. & Streets	25,000			
IL30-11 Alorton	Window Replacement	130,000			
	Site Work	70,000			
			IL30-12 Brooklyn	Siding	100,000
			IL30-13 New Athens	Kitchen & Bathrooms	80,000
				Flooring Replacement	50,000
				Interior Wall Repair	48,000
				Smoke Detectors/CO ²	25,000
Total CFP Estimated Cost					

**Capital Fund Program Five-Year Action Plan
Part II: Supporting Pages—Work Activities**

Activities for Year :__4__ FFY Grant: 2008 PHA FY: 2008			Activities for Year: 5 FFY Grant: 2009 PHA FY: 2009		
Development Name/Number	Major Work Categories	Estimated Cost	Development Name/Number	Major Work Categories	Estimated Cost
IL30-16 Belleville	Roofing	40,000	IL30-16 Belleville	Video security	10,000
	Flag pole/lighting	7,000			
	Site work	10,000	IL30-18 Swansea	Site improvements	125,000
	Storage building	25,000			
			IL30-21 New Athens	Kitchen & Bathrooms	80,000
				Flooring Replacement	50,000
				Exterior Bldg. Impv.	100,000
				Interior Wall Repair	48,000
				Smoke Detectors/CO ²	25,000
				Site Work	40,000
			IL30-22 Millstadt	Kitchen & Bathrooms	90,000
				Flooring Repl.	60,000
				Interior Wall Repair	55,000
				Smoke Detectors/CO ²	30,000
				Sump Pump Installation	5,000
			IL30-27 Belleville	Site Work	20,000
	Contingency	61,614	Property Wide	Fire Protection	50,000
			Property Wide	Energy Audit	15,000
Total CFP Estimated Cost					

RESIDENT ADVISORY BOARD OF THE
ST. CLAIR COUNTY HOUSING AUTHORITY

Ms. Jackie Campbell, Vice-Chairman
221 South Lincoln
Smithton, IL 62285
Public Housing Resident

Ms. Sarah Wyrick
130 N. 2nd Street, Apt. 4
Dupo, IL 62239
Public Housing Resident

Ms. Vivian Cash*
Treasurer, Ernest Smith Sr. Resident Council
4647 Trendley
Centreville, IL 62207
Public Housing Resident

Ms. Patricia Beard
P. O. Box 8225
Belleville, IL 62222-8225
Section 8 Participant

Mr. Norman Rains, Chairman
Vice -President, Bel-Plaza I Resident Council
114 South Church St., Apt. 209
Belleville, IL 62220
Public Housing Resident

Ms. Melanie Sanders
President, Brooklyn Resident Council
600 South 6th Street, Apt. 131
Brooklyn, IL 62059
Public Housing Resident

Ms. Lillie Smith, Secretary
President, Ernest Smith Sr. Resident Council
4720 Tudor
Centreville, IL 62207
Public Housing Resident

Ms. Lysle Louise Steele
310 E. 8th St., F-4
Marissa, IL 62257
Public Housing Resident

Ms. Rosemary Taylor
President, Greystone Resident Council
101 Greystone Drive
Alorton, IL 62207
S8New Construction

Mr. DeMario Helm
President, Private Mathison Manor Resident Council
6614 Future
Centreville, IL 62207
Public Housing Resident

*Member of St. Clair County Housing Authority Board of Commissioners

ST. CLAIR COUNTY HOUSING AUTHORITY

Conversion Analysis

Initial Assessment – Agency Plan Update 2005

Conversion Analysis Initial Assessment – Agency Plan Update 2005									
Dev. #	Dev. Location	Excluded ?	Certification		Conclusion		Necessary Conditions for Voluntary Conversion		
			P/H Operation Reviewed	Conversion Implications	Appropriate	Inappropriate	More Expensive	Resident Benefit	No Housing Availability Impact
30-1	Brooklyn	No	Yes	Yes		X	Questionable	No	No
30-2	Marissa	No	Yes	Yes		X	No	No	No
30-3	Dupo	No	Yes	Yes		X	No	No	No
30-5	Smithton	No	Yes	Yes		X	No	No	No
30-6	Centreville	No	Yes	Yes		X	No	No	No
30-7	Marissa	Yes	N/A	N/A		X	N/A	N/A	N/A
30-8	Centreville	No	Yes	Yes		X	No	No	No
30-9	Brooklyn	No	Yes	Yes		X	No	No	No
30-10	Centreville	No	Yes	Yes		X	No	No	No
30-11	Alorton	No	Yes	Yes		X	No	No	No
30-12	Brooklyn	No	Yes	Yes		X	No	No	No
30-13	New Athens	No	Yes	Yes		X	No	No	No
30-14	Lebanon	No	Yes	Yes		X	No	No	No
30-16	Belleville	Yes	N/A	N/A		X	N/A	N/A	N/A
30-17	Washington Park	No	Yes	Yes		X	No	No	No
30-18	Swansea	Yes	N/A	N/A		X	N/A	N/A	N/A
30-19	Lenzberg	No	Yes	Yes		X	No	No	No
30-20	Centreville	Yes	N/A	N/A		X	N/A	N/A	N/A
30-21	New Athens	Yes	N/A	N/A		X	N/A	N/A	N/A
30-22	Millstadt	No	Yes	Yes		X	No	No	No
30-27	Belleville	Yes	N/A	N/A		X	N/A	N/A	N/A
30-28	Lenzberg	No	Yes	Yes		X	No	No	No

Optional Public Housing Asset Management Table

See Technical Guidance for instructions on the use of this table, including information to be provided.

Public Housing Asset Management Table - 2005								
Development Identification ¹		Activity Description						
Name, Number, and Location	Number and Type of units	Capital Fund Program Parts II and III <i>Component 7a</i>	Development Activities <i>Component 7b</i>	Demolition / Disposition <i>Component 8</i>	Designated housing <i>Component 9</i>	Conversion <i>Component 10</i>	Home- ownership <i>Component 11a</i>	Other (describe) <i>Component 17²</i>
#1 – Brooklyn	100	\$2,609,342	None Planned ³	None Planned ³	None Planned	None Planned	None Planned ³	DBA/CSA
#2 – Marissa	18	\$0	None Planned	None Planned	None Planned	None Planned	None Planned	DBA/CSA
#3 – Dupo	20	\$75,000	None Planned	None Planned	None Planned	None Planned	None Planned	DBA/CSA
#5 – Smithton	10	\$5,000	None Planned	None Planned	None Planned	None Planned	None Planned	DBA/CSA
#6 – Centreville	178	\$1,070,500	None Planned	None Planned	34 units elderly only	None Planned	None Planned	DBA/CSA
#7 – Marissa	14	\$0	None Planned	None Planned	None Planned	None Planned	None Planned	DBA/CSA
#8 – Centreville.	142	\$250,000	None Planned	None Planned	None Planned	None Planned	None Planned	DBA/CSA
#9 – Brooklyn	42	\$0	None Planned	None Planned	None Planned	None Planned	None Planned	DBA/CSA
#10 – Centreville	110	\$0	None Planned	None Planned	None Planned	None Planned	None Planned	DBA/CSA
#11 – Alorton	44	\$200,000	None Planned	None Planned	None Planned	None Planned	None Planned	DBA/CSA
#12 – Brooklyn	16	\$100,000	None Planned	None Planned	None Planned	None Planned	None Planned	DBA/CSA
#13 – New Athens	16	\$285,000	None Planned	None Planned	4-1br disabled only	None Planned	None Planned	DBA/CSA
#14 – Lebanon	24	\$0	None Planned	None Planned	4-1br disabled only	None Planned	None Planned	DBA/CSA
#16 & #61– Belleville	86	\$438,000	None Planned	None Planned	86 units elderly only	None Planned	None Planned	DBA/CSA
#17 – Washington Park	32	\$0	None Planned	None Planned	20-1br disabled only	None Planned	None Planned	DBA/CSA
#18 – Swansea	16	\$0	None Planned	None Planned	16 units elderly only	None Planned	None Planned	DBA/CSA
#19 – Lenzburg	8	\$0	None Planned	None Planned	4-1br disabled only	None Planned	None Planned	DBA/CSA
#20 – Centreville	8	\$0	None Planned	None Planned	None Planned	None Planned	None Planned	DBA/CSA
#21 – New Athens	16	\$343,000	None Planned	None Planned	16 units elderly only	None Planned	None Planned	DBA/CSA
#22 – Millstadt	18	\$245,000	None Planned	None Planned	None Planned	None Planned	None Planned	DBA/CSA
#24 – O’Fallon	20	\$0	None Planned	None Planned	None Planned	None Planned	None Planned	DBA/CSA
#27 – Belleville	64	\$526,000	None Planned	None Planned	64 units elderly only	None Planned	None Planned	DBA/CSA
#28 – Lenzburg	8	\$0	None Planned	None Planned	None Planned	None Planned	None Planned	DBA/CSA

¹ See attached for greater details regarding development

² Development-based Accounting and Comprehensive Stock Assessment

³ Engineering assessments /prototype renovation to be completed in 2004-2005. Possibility exists that demolition/replacement (under Conversion, Hope 6, etc.) may prove more cost effective than traditional modernization for this development.

**PUBLIC HEARING MINUTES
2005 AGENCY PLAN UPDATE
ST. CLAIR COUNTY HOUSING AUTHORITY
5:00 P.M., MONDAY, APRIL 4, 2005**

The St. Clair County Housing Authority (SCCHA) held a Public Hearing regarding its 2005 Agency Plan Update on April 4, 2005 at 5:00 p.m., at its Central Office located at 1790 South 74th St., Belleville, IL. 62223.

The Public Hearing was advertised in the local newspaper, Belleville News Democrat, on February 18th and 20th. Notice of the Public Hearing was also included in a mailing to all public housing and Section 8 households on or around February 1st. Notice was also mailed to dozens of local service providers and municipal officials on February 3rd.

These outreach efforts resulted in a total of eight (8) persons attending the April 4th Public Hearing. The attendees included public housing residents, Section 8 participants, and a representative from Land of Lincoln Legal Assistance Foundation. Refer to attached sign-in sheet.

Larry McLean, Management Director, presided over the hearing. Each person in attendance received a copy of the 2005 Agency Plan, along with all attachments and supportive documentation, specifically including the Capital Fund Five Year Plan.

Mr. McLean provided a summary review of the purpose and intent of the Agency Plan and the development process. The Agency Plan template was reviewed (in highlight fashion) in its entirety, including the following major sections:

- Five Year Plan Summary Section (pages 1 – 3)
- Annual PHA Plan PHA Fiscal year 2005

- Executive Summary
- Table of Contents
- Statement of Housing Needs
- Housing Needs of Families on the Public Housing and Section 8 Tenant-Based Assistance Waiting Lists
- Statement of Financial Resources
- PHA Policies Governing Eligibility, Selection, and Admissions
 - Public Housing
 - Section 8
- Operations and Management
- Grievance Procedures
- Capital Improvement Needs
- Demolition and Disposition
- Designation of Public Housing for Occupancy by Elderly Families or Families with Disability or Elderly Families with Disabilities

Conversion of Public Housing To Tenant-Based Assistance
Homeownership Programs
Community Service and Self-Sufficiency Programs
Safety and Crime Prevention Measures
Pet Policy
Civil Rights Certifications
Fiscal Audit
PHA Asset Management
Other Information
 Resident Advisory Board
 Election Process for Resident Commissioner
 Consistency with Consolidated Plan

As Mr. McLean reviewed the document, he responded to various questions regarding the content of the Agency Plan. Those considered most noteworthy are noted below.

Nichele Moore, from LOLLAF, requested clarification regarding the proposed changes in the requirements for reporting household income increases between annual recertifications. Mr. McLean went over the changes that were summarized in an attachment to the Agency Plan (i.e. public housing tenants would have to report increased income amounts between recertifications if they receive a UAP and/or if the new income source is a public benefit such as SS, SSI, TANF, general assistance).

A variety of miscellaneous other topics / issues related to various Agency Plan materials and resident council matters were discussed during the hearing.

The Public Hearing formally closed at approximately 7:15 p.m., although Mr. McLean remained available to respond to individual concerns and questions raised by those in attendance.

Prepared by: _____ April 7, 2005
Larry McLean, Management Director

CONTINUED OCCUPANCY AND COMMUNITY SERVICE

(NOTE: This Section was suspended by Congress through 9/30/02. It was reinstated and shall apply to SCCHA with the start of the fiscal year 7/1/03).

GENERAL

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

EXEMPTIONS

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

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

NOTIFICATION OF THE REQUIREMENT

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

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

family members to claim and explain an exempt status. The St. Clair County Housing Authority shall verify such claims.

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

VOLUNTEER OPPORTUNITIES

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

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

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

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

THE PROCESS

At the first annual reexamination on or after July 1, 2003, and each annual reexamination thereafter, the St. Clair County Housing Authority will do the following:

- A. Provide a list of volunteer opportunities to the family members.
- B. Provide information about obtaining suitable volunteer positions.
- C. Provide a volunteer time sheet to the family member. Instructions for the time sheet require the individual to complete the form and have a supervisor date and sign for each period of work.

- D. Assign family members to a volunteer coordinator who will assist the family members in identifying appropriate volunteer positions and in meeting their responsibilities. The volunteer coordinator will track the family member's progress monthly and will meet with the family member as needed to best encourage compliance.
- E. Thirty (30) days before the family's next lease anniversary date, the volunteer coordinator will advise the St. Clair County Housing Authority whether each applicable adult family member is in compliance with the community service requirement.

NOTIFICATION OF NON-COMPLIANCE WITH COMMUNITY SERVICE REQUIREMENT

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

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

OPPORTUNITY FOR CURE

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

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

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

IL30h01

IL30h01

DECONCENTRATION POLICY

It is St. Clair County Housing Authority's policy to provide for deconcentration 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 deconcentration incentives to implement. The worksheet for the analysis can be found in **Appendix D**.

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 deconcentration 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.

Resident Advisory Board Meeting
November 30, 2004
Minutes

The annual meeting of the Resident Advisory Board for the St. Clair County Housing Authority's Comprehensive Agency Plan was convened on November 30, 2004 at the Central Office, Belleville, IL.

Chairman, Norman Rains, called the meeting to order, with the members present recorded on the attached sign-in sheet. Larry McLean, Management Director, welcomed those in attendance.

A motion was made, seconded, and passed to approve the minutes of the March 23rd meeting.

Membership issues were discussed. A motion was made, seconded and passed to remove Carolyn Hensley and Daniel Mullane as RAB members representing the Section 8 Program due to non-attendance. The members requested that Mr. McLean contact non-attending Resident Council Presidents, invite Section 8 participants who attended the 2004 public hearing that expressed an interest in joining and send a recruitment letter to the residents of St. Libory and Cedar Ridge and Section 8 participants.

The RAB Administrative Plan was reviewed.

The election of officers resulted in the following members being elected to the positions noted:

Norman Rains, Chairman Jackie Campbell, Vice-President
Lillie Smith, Secretary.

Mr. McLean provided the members with a copy of the letter from HUD confirming approval of the 2004 Agency Plan.

Mr. McLean gave the members copies of the letter from HUD with results of the RIM (Rental Integrity Monitoring) Review conducted August 2-6, 2004, along with SCCHA's responses (separate for Section 8 and Public Housing). Mr. McLean noted that the 2004 review was conducted in a completely different manner than in 2003. The HUD staff asked SCCHA staff if they had a question regarding a file or could not locate a document. The results were much improved, with far fewer findings noted.

A copy of HUD's Community Service Program review and SCCHA's response was provided to and reviewed with the members.

The members received a copy, reviewed, and discussed the results of HUD's Resident Survey. The difficulty SCCHA has had in obtaining the targeted 75% rating in communication and neighborhood appearance was noted and discussed. Mr. McLean reported that this was the first year that the 75% mark was achieved in the "safety" category.

A meeting schedule was adopted related to the review and comment on the 2005 Agency Plan (see attached). The next meeting will be December 21st.

Copies of the "Memo to Members" the weekly newsletter of the National Low Income Housing Coalition were distributed to members. The members agreed that it was not necessary to mail this publication to them in between meetings. It will be distributed at the meetings.

The meeting was adjourned at approximately 12:00 noon.

Prepared by: _____ Date: December 13,
2004

Larry McLean, Management Director

Authorized by: _____ Date: _____
Lillie Smith, Secretary

Resident Advisory Board Meeting

December 21, 2004

Minutes

A meeting of the Resident Advisory Board for the St. Clair County Housing Authority's Comprehensive Agency Plan was convened on December 21, 2004 at the Central Office, Belleville, IL.

Chairman, Norman Rains, called the meeting to order, with the members present recorded on the attached sign-in sheet. Larry McLean, Management Director, welcomed those in attendance.

A motion was made, seconded, and passed to approve the minutes of the November 30th meeting.

Membership issues were discussed. Copies of letters sent out under the signature of Chairman Rains were distributed to the members. The letters included mailings to non-attending Resident Council Presidents to encourage attendance, confirm removal of Daniel Mullane and Carolyn Hensley from the RAB for non-attendance, invitations to two Section 8 participants who attended the public hearing and expressed an interest in joining, solicitations to residents of Cedar Ridge and St. Libory (Rural Housing Developments) and Section 8 participants.

James Blackman, Finance Director, briefed the members on the financial statement contained in the Agency Plan. The following budget figures were noted, among other financial matters: the public housing program operates on an expense level of \$268 per unit per month (PUM); \$2.7 million in HUD operating subsidy was budgeted for the current fiscal year, along with \$1.463 million in tenant rents; the budget included a \$750,000 overrun (funded with reserves) due primarily to the Central Office relocation and computer system conversion; Drug Elimination Funds have reduced from about \$250,000 a year just a few years ago to \$70,000 in the current budget; the Section 8 program budgets for assistance to 1,850 households, utilizing a \$10 million funding level, with about \$1 million in administrative costs; the Section 8 program numbers reflect \$120,000 reduction in funds, a trend likely to continue; Capital Grants Program fund also experienced a reduction in funding, with SCCHA receiving \$1.265 million in 2004.

Tony Vecera, Maintenance / Technical Services Director, presented the draft 5 Year Capital Grants Program Plan. It was noted that the central air conditioning project for the Centreville Properties were not in the plan document because funding is allocated in 2004 and A&E is underway with work anticipated in mid to late 2005. The renovation of Thomas Terry Apartments in Brooklyn (30-1) is

the major project for the first two years, budgeted at \$807,498 and \$1,120,614 respectively. The physical conditions of the buildings in Brooklyn were discussed at length. Ms. Sanders asked why storm doors were not being replaced as part of the demonstration building work currently in progress. Mr. Vecera responded that most multi-family housing developments are moving away from storm doors due to the high cost of maintenance, citing Parson's Place in East St. Louis as an example. Mr. Rains reported that there were two water leaks at the building on 114 S. Church (1st and 4th^d floors). Mr. Vecera indicated that these conditions would be checked out and addressed, but he anticipated that the repairs would be made as operating budget work as opposed to Capital Grants Program work items. Mr. Vecera thanked Mr. Rains for bringing these conditions to his attention and requested that these type of common area problems be reported via the work order line. Ms. Wyrick noted the high cost of concrete repair and the need for grab bars in the bathrooms of the senior units in Dupo. Mr. Vecera noted that the plan was considered a draft and would be mailed to all residents by February 1st for review and comment.

Debra Kenton, Program Manager, briefed the members on issues impacting the Section 8 Housing Choice Voucher Program and responded to related questions. Proposed funding cuts is a major issue for the program. The 2005 budget reduced funding levels and similar cuts are anticipated in future years as Congress and the Administration struggle with the federal budget in an era of high war costs and no desire to raise taxes. The on-going difficulties associated with the conversion to the new computer system were noted. Ms. Kenton estimated that the voucher utilization rate was about 75%, up from recent years. She noted that all participants are given 120 days+ to utilize a voucher once issued. Households needing larger units (i.e. three and four bedroom households) have the most difficulty in utilizing vouchers and there is a concern that the supply of available units of this size is concentrated in relatively few and undesirable areas. The program currently has the payment standard set at 100% of the Fair Market Rents.

The draft Follow-Plan to HUD's Resident Survey results was distributed and reviewed. The follow-up plan covered two survey component areas, Communication and Neighborhood Appearance. There was a lengthy discussion related to the survey results, the possible reasons for the low scores in certain categories, and the planned activities for improving the scores.

Mr. McLean shared a copy of the HUD notice received regarding the requirements to complete an energy audit of its public housing developments and to annually update the Utility Allowance Schedule. Energy audits are expensive to complete and the estimated costs will be incorporated into the Capital Grants Program. The management staff monitors utility rates and makes annual adjustments to the utility allowances. Mr. McLean brought particular attention

to the requirement that the utility allowance must exclude the estimated cost of operating air conditioning.

The Public Housing Assessment System (PHAS) certification and scoring packet was reviewed. It was noted that SCCHA had received an overall score of 88%, resulting in a standard performer rating. SCCHA's goal is to obtain "high performer" status, but it will be difficult given the current scoring methodology and the tight REAC inspection standards. The four PHAS components, physical, financial, management, and resident survey, were reviewed. Mr. McLean noted that the 4 points lost in the management category was the result of a failing score in unit turnaround time (i.e. how long on average it takes SCCHA to repair and lease vacant units).

A revised meeting schedule was adopted related to the review and comment on the 2005 Agency Plan (see attached). The next meeting will be January 12th.

Current copies of the "Memo to Members" (the weekly newsletter of the National Low Income Housing Coalition), the "NAHRO Monitor" and "HAC News" were distributed to members. The major issue addressed in all the newsletters was the likely funding cuts in housing programs.

The meeting was adjourned at approximately 12:00 noon.

Prepared by: _____ Date: January 7, 2005
Larry McLean, Management Director

Authorized by: _____ Date: _____
Lillie Smith, Secretary

Resident Advisory Board Meeting

January 21, 2005

Minutes

A meeting of the Resident Advisory Board for the St. Clair County Housing Authority's Comprehensive Agency Plan was convened on January 12, 2005 at the Central Office, Belleville, IL.

Chairman, Norman Rains, called the meeting to order, with the members present recorded on the attached sign-in sheet. Larry McLean, Management Director, welcomed those in attendance.

A motion was made, seconded, and passed to approve the minutes of the December 21st meeting.

Membership issues were discussed. Mr. McLean reported that there had not yet been any response to the recruitment letters mailed.

Mr. McLean asked if there were any follow-up questions to the issues / matters discussed at the last meeting. There were none.

The proposed Utility Allowance Schedule for 2005 was presented and discussed. No changes were being proposed because none of the utility service providers for tenant paid utilities reported any rate increases.

SCCHA's SEMAP (Section 8 Management Assessment Program) Certification and Scoring packet for 2004 was reviewed. SCCHA received a perfect 100% score on the 13 indicators assessed and received a "high performer" designation.

Mr. McLean highlighted several proposed changes to the Admissions and Continued Occupancy Policy:

- Incorporation of the site-based waiting list process that went into effect July 1, 2003;
- Revise the "verification" language to include HUD's Upfront Income Verification procedures;
- Adds language to incorporate SCCHA's practice of requiring applicants / residents to document legal guardianship / custody for minor household members who are not children of the head of household or other adult family member;
- Provides for increasing the monthly rent to the Flat / Ceiling Rent level when households fail to cooperate with the recertification process;
- Requires households receiving negative rent payments (UAPs) to report increases in household income between annual recertifications;

- Requires households that start receiving new benefits (SS/SSI/TANF) for any household member to report the increase in income between annual recertifications;
- Incorporates the “Fire Loss Re-Housing Determination Policy;”
- Incorporates the “Smoking Policy for Hi-Rise Buildings;”

The Resident Participation Budget and RAB Allocation were reviewed. Possible training options for RAB and RC officers were discussed (NAHRO and NLIHC). Mr. Rains expressed an interest in attending the NLIHC conference in May. Mr. McLean indicated that it would be appropriate to send a representative to the conference at least once to assess its usefulness. Any member that was interested in attending either the NAHRO or NLIHC conference was requested to submit a written request. In terms of the RAB budget allocation, it was noted that Lillie Smith’s August 2004 trip to the NARMC conference should be charged to this account.

Mr. McLean reported that the street addresses for several buildings on South 47th and South 49th Streets in Centreville were being changed to South 44th and South 46th Street at the direction of the St. Clair County 911 Coordinator and at the request of the Mayor of Centreville.

The Flat / Ceiling Rent schedule was reviewed. Mr. McLean reported that no changes in the schedule were being proposed for the fiscal year ending June 30, 2006.

The next meeting will be February 9th.

The current copy of the “Memo to Members” (the weekly newsletter of the National Low Income Housing Coalition) was distributed to members. The Belleville News Democrat article regarding housing affordability was reviewed and discussed.

The meeting was adjourned at approximately 11:30 a.m.

Prepared by: _____ Date: January 21, 2005
 Larry McLean, Management Director

Authorized by: _____ Date: _____
 Lillie Smith, Secretary

Resident Advisory Board Meeting

February 9, 2005

Minutes

A meeting of the Resident Advisory Board for the St. Clair County Housing Authority's Comprehensive Agency Plan was convened on February 9, 2005 at the Central Office, Belleville, IL.

Chairman, Norman Rains, called the meeting to order, with the members present recorded on the attached sign-in sheet. Larry McLean, Management Director, welcomed those in attendance.

A motion was made, seconded, and passed to approve the minutes of the January 12th meeting.

Membership issues were discussed. Mr. McLean reported that a number of responses had been received from Section 8 participants expressing an interest in joining the RAB. No responses were received from non-public housing properties operated by SCCHA (i.e. Townhouse Court, Gwendolene Court, Cedar Ridge, and St. Libory). Upon discussion it was agreed that the Section 8 participants that responded would be invited in for an interview at a future date.

Mr. McLean asked if there were any follow-up questions to the issues / matters discussed at the last meeting. He responded to various follow-up questions asked.

The RAB report was presented and reviewed, with Mr. McLean noting that the report does not include the cost of the training workshop attended by Lillie Smith in August 2004. He stated that the costs associated with that training program would be incorporated into the next budget report. Mr. McLean reminded the members that if any were interested in attending the training sessions discussed at the last meeting that a written request should be submitted.

The 2003 Annual Report for the National Low-Income Housing Coalition was reviewed and discussed. The members noted that according to the report, a person working 40 hours a week had to earn an average of \$15.21 an hour to be able to afford modest rental housing.

The Income Deconcentration Analysis completed for the public housing developments with 100 or more units was presented by Mr. McLean. Using HUD guidelines (i.e. average p/h income, a high a low range based upon 85% and 115% of average, adjusting for bedroom size, etc.), one development, 30 10 in Private Mathison indicates a concentration of low-income residents. Mr. McLean explained that in his opinion this is explained by the fact that 30-10 does

not have central air conditioning and many applicants will by-pass this location for another that has central air. It was noted that by the end of this year, the 30-10 development would have central air installed and this is expected to impact the low-income concentration.

The 2004 public housing move-out analysis report was distributed and reviewed. The report showed that 151 tenants moved out during 2004, resulting in a turnover rate of about 15%. The reason code was noted. Highlights of the report included the percentage of tenants that vacated due to purchasing a home, death or health concerns.

A "PHA Homeownership Report" that detailed the number of homebuyer closings for households utilizing Section 8 Vouchers by housing authority was reviewed. The obvious implication of the report was that a lot of effort was required to achieve relatively small number of successful closings. Regardless, Mr. McLean indicated that SCCHA still plans on trying to use up to 25 of its Section 8 Vouchers for participant home ownership.

The draft 2005 Agency Plan template, including both the 5 Year Plan and Annual Plan components was distributed to the members. The group reviewed the complete 5 Year Plan segment and made it through page 11 of the Annual Plan, section 2 "reasons for selecting strategies." Mr. McLean requested that the members review the remainder of the document before the next meeting, where they will have an opportunity to ask any questions they may have regarding the content.

The next meeting is scheduled for February 18th, although Mr. McLean indicated that it might be delayed due to the time necessary to prepare. The members would be notified of any schedule change in writing.

The current copies of the "Memo to Members" (the weekly newsletter of the National Low Income Housing Coalition) were distributed to members. Several other special publications related to affordable housing issues were distributed, including "Changing Priorities, The Federal Budget & Housing Assistance 1976-2005"; "Up Against A Wall: Housing Affordability for Renters;" "Shelter Force, A Better Life? The New Face of Public Housing;" and "Call to Action: Call to Release Emergency Assistance Funds."

The meeting was adjourned at approximately 11:45 a.m.

Prepared by: _____ Date: February 15, 2005
Larry McLean, Management Director

Authorized by: _____ Date: _____
Lillie Smith, Secretary

Resident Advisory Board Meeting

February 24, 2005

Minutes

A meeting of the Resident Advisory Board for the St. Clair County Housing Authority's Comprehensive Agency Plan was convened on February 24, 2005 at the Central Office, Belleville, IL.

Chairman, Norman Rains, called the meeting to order, with the members present recorded on the attached sign-in sheet. Larry McLean, Management Director, welcomed those in attendance.

A motion was made, seconded, and passed to approve the minutes of the February 9th meeting.

Membership issues were discussed and it was agreed that prospective members from the Section 8 Housing Choice Voucher Program would be interviewed on Thursday, March 24th at 10:00 a.m. The Chairman requested that members phone numbers be included on the membership roster included in the meeting packet. Mr. McLean agreed to provide this information since it reflected the consensus of the board.

Mr. McLean responded to miscellaneous follow-up questions to the issues / matters discussed at the last meeting. Jackie Campbell noted the need for grab bars for senior units in Smithton.

The RAB budget report was presented and reviewed, with Mr. McLean noting that the report does now included the cost of the training workshop attended by Lillie Smith in August 2004.

An updated draft 2005 Agency Plan template, including both the 5 Year Plan and Annual Plan components, plus attachments and supporting documentation was distributed to the members. The group reviewed the complete 5 Year Plan segment and made it through page 11 of the Annual Plan, section 2 "reasons for selecting strategies" at the February 9th meeting. Mr. McLean highlighted the remaining components of the Annual Plan, including:

- Statement of financial resources
- Policies governing eligibility, selection, and admission
- Rent determination policies
- Section 8 tenant based assistance
- Operation and Management
- Grievance procedures

- Capital Improvement needs
- Demolition and disposition
- Designation of public housing units
- Conversion of public housing to tenant-based assistance
- Homeownership programs administered by the PHA
- Community Service and Self-sufficiency programs
- Safety and Crime Prevention Measures
- Pet Policy
- Civil Rights Certifications
- Fiscal Audit
- PHA Asset Management
- Other information

In addition the following Annual Plan attachments and/or supportive documentation were distributed for the members to review:

- Changes to Admissions and Continued Occupancy Policy
- Capital Grants Program 5 Year Summary
- Conversion Analysis
- Public housing asset management table
- Community Service Policy
- Deconcentration Policy
- Site Based Waiting List Breakdown / Narrative
- Designation Narrative
- Section 8 Homeownership Capacity Statement
- Pet Policy
- Management Needs Assessment
- Management Improvement 5 Year Projections
- Public housing flat rent schedule
- Resident Survey Follow-up Plan
- Utility Allowance Schedule for Public Housing

The “Designation Narrative” was reviewed and discussed in detail. The members expressed their support for the designation plan. Mr. McLean noted that HUD rejected the “designation” proposal that was submitted in 2003 and that he intended to request letters of support from the RAB and impacted resident councils this time around.

The next meeting is scheduled for March 24th and will include interviews of prospective Section 8 Program members and possibly a drive-by tour of one or more public housing developments.

The current copies of the “Memo to Members” (the weekly newsletter of the National Low Income Housing Coalition) were distributed to members. The meeting was adjourned at approximately 11:45 a.m.

Prepared by: _____ Date: February 15, 2005
Larry McLean, Management Director

Authorized by: _____ Date: _____
Lillie Smith, Secretary

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Resident Advisory Board Meeting
March 24, 2005
Minutes

A meeting of the Resident Advisory Board for the St. Clair County Housing Authority's Comprehensive Agency Plan was convened on March 24, 2005 at the Central Office, Belleville, IL.

Chairman, Norman Rains, called the meeting to order, with the members present recorded on the attached sign-in sheet. Larry McLean, Management Director, welcomed those in attendance.

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

Mr. McLean responded to miscellaneous follow-up questions to the issues / matters discussed at the last meeting.

Interviews were scheduled with a thirteen (13) prospective RAB members from the Section 8 Housing Choice Voucher Program. Only three participants kept their appointment--- Jessie Hooper of Washington Park, Cornelia Washington-Hunt of Belleville, and Jacqueline Tunstall from Cahokia. A motion was duly made, seconded and passed to add Jessie Hooper, Cornelia Washington-Hunt, and Jacqueline Tunstall to the RAB effective immediately.

The next meeting was scheduled for 10:00 a.m., April 13th. The meeting will cover any last minute changes to the Agency Plan resulting from the public hearing to be held April 4th and/or comments made / received during the 45 day comment period. In addition, if time permits, a drive-by tour of public housing properties may be incorporated into the agenda.

The current copies of the "Memo to Members" (the weekly newsletter of the National Low Income Housing Coalition) were distributed to members. The meeting was adjourned at approximately 12:15 p.m.

Prepared by: _____ Date: March 29, 2005
Larry McLean, Management Director

Authorized by: _____ Date: _____
Lillie Smith, Secretary

CURRENT WAITING LIST FOR PUBLIC HOUSING

2/16/05

LOCATION	0 BR	1BR	2 BR	3BR	4BR	5BR	TOTALS
ADELINE JAMES BLDG.		8	1				9
ALORTON		443	394	182	41		1060
BEL PLAZA I		7					7
BEL-PLAZA II		16					16
AMBER COURT		21					21
BROOKLYN		177	95	50	27	6	355
ERNEST SMITH		489	418	151	65	9	1132
PRIVATE MATHISON		503	464	174	52		1193
DUPO		78	347	132	32		589
LEBANON		172	326	218	5		721
LENZBURG		48	111	61			220
MARISSA		1	2	3	19		25
MILLSTADT		24	368	210	4		606
NEW ATHENS		21	120				141
O'FALLON		1	899	1	2		903
SMITHTON		25	18	199	41		283
SWANSEA		92					92
WASHINGTON PARK		230	343	1	1		575
TOTALS		2356	3906	1382	289	15	7948

IL30k01

**Designated Housing Plan For The
St. Clair County Housing Authority**

Proposed Effective Date: July 1, 2005

Non-discrimination Requirements: In carrying out its Designated Housing Plan (hereinafter called the “Plan”), the St. Clair County Housing Authority (SCCHA) shall comply with the non-discrimination provisions of Federal civil rights laws, including but not limited to Section 504 of the Rehabilitation Act and its implementing regulation at the 24 CFR Part 8, the Fair Housing Act and its implementing regulation at 24 CFR Part 100, and Titles II and III of the Americans with Disabilities Act and their implementing regulations at 28 CFR Parts 35 and 36.

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

Table #1A – Developments Designated as “Elderly Only”

<u>Development #</u>	<u>Location</u>	<u>Unit Count</u>
IL30-6 (partial)	Centreville	34 (Adeline James Hi-Rise Building)
IL30-16	Belleville	86 (Bel-Plaza Hi-Rise Buildings)
IL30-18	Swansea	16
IL30-21	New Athens	16
IL30-27	Belleville	<u>64</u>
	Total	216

Table #1B – Developments Designated as “Non-Elderly Disabled Only”

<u>Development #</u>	<u>Location</u>	<u>Unit Count</u>
IL30-13 (partial)	New Athens	4
IL30-14 (partial)	Lebanon	4
IL30-17 (partial)	Washington Park	20
IL30-19 (partial)	Lenzburg	<u>4</u>
	Total	32

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

Table #2 – Developments Designated as “Mixed Population”

<u>Development #</u>	<u>Location</u>	<u>Unit Count</u>
IL30-3	Dupo	6
IL30-5	Smithton	6
IL30-7	Marissa	14
IL30-20	Centreville	8
IL30-22	Millstadt	<u>12</u>
	Total	42

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 non-elderly disabled population.

Table #3 – Developments Designated as “Family” Units

<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
	Total	71	

Justification for Designation: SCCHA waiting lists, census data, and other reports verify that there are substantial unmet housing needs for both elderly families and persons with disabilities in St. Clair County. However, the problems associated with “mixing” elderly and young disabled populations in high-density residential settings, which are characteristic of the public housing developments designated for “elderly only” above, have been well documented on a local and national basis. Therefore, keeping in mind the overall housing needs of the low-income population of St. Clair County, and not just one group, it has been determined that the above-described designations are necessary to both: achieve the housing goals for St. Clair County under the Comprehensive Housing Affordability Strategy (CHAS) under Section 105 of the Cranston-Gonzales National Affordable Housing Act; and, best meet the housing needs of the total low-income population of St. Clair County.

Table #4 contains information regarding the housing needs of (based upon one bedroom waiting list data) and housing assistance provided (both the Section 8 and public housing programs) to the elderly and non-elderly disabled.

Table #4

	Public Housing		Section 8 Voucher	
	Elderly	Non-elderly Disabled	Elderly	Non-elderly Disabled
# On Waiting List	79	124	70	196
# Receiving Assistance	357	178	171	559

The data evidences a greater participation rate among elderly households in the public housing program and young disabled households in the Section 8 Housing Choice Voucher Program. This is due to variety of local factors, including a local preference point for disabled applicants on the Section 8 waiting list.

SCCHA has enjoyed a close, cooperative relationship with the local agencies that advocate for and provide supportive services to persons with disabilities. Through our past business dealings, we have developed a mutual recognition of the incompatibility of the elderly and young disabled populations’ lifestyles and the impact they have on successfully providing housing assistance in a community setting. These service providers counsel their young disabled clients to pursue the Section 8 Program and assist

them in obtaining suitable housing once they obtain their voucher. While specific numbers are not available, the staff reports a higher than average utilization rate among young disabled households issued a voucher. The converse is true about the public housing program. Because of location and other amenities, elderly households tend to prefer the public housing identified for designation. It is not uncommon for an elderly participant in the Section 8 Program to request a transfer to a public housing site. In sum, in general terms the elderly prefer public housing and the young disabled prefer Section 8, with this being demonstrated by the participation numbers provided in Table #4. A letter endorsing this Designation Plan from the local State-funded “Living Independently Now Center” or LINC, Inc. is enclosed. LINC serves as an advocate for persons with disabilities.

The proposed designations are not anticipated to have any impact on racial composition of any of the developments targeted. The last **“On-Site Fair Housing and Equal Opportunity Monitoring Review” of our public housing and Section 8 Program** warrants comment. Related to the public housing program, the review found **“Commendable Performance in Tenanting Practices and Occupancy Patterns and in site and Location Data.”** A copy of the entire report is attached for your review. Also enclosed is a report that summarizes the racial composition of the developments proposed for designation. The report documents that most of the properties targeted for designation are racially integrated, most notably the three large developments in Belleville with proposed “elderly only” designations (30-16, 27, and 61).

Development Description: Attachment #1 includes a description of:

- a) the development (or portions of a development) to be designated;
- b) the types of tenants for which the development is to be designated;
- c) any supportive services to be provided to tenants of the designated development;
- d) how the design and related facilities of the development accommodate the special environmental needs of the intended occupants.

Alternate Resources: SCCHA has no plans to directly pursue additional housing assistance resources to provide assistance to families that may have been housed if occupancy in the developments targeted were not restricted as requested in Table #1. There is no local support for an expanded Section 8 or public housing program. However, SCCHA will continue to support the efforts of other housing providers to develop housing for both of the subject groups (i.e. elderly and young disabled). Several new affordable housing developments serving both groups have come on-line in recent years or are planned for completion in the near future. SCCHA’s administration of a local preference for disabled households under the Section 8 Program is referenced again. The preference has increased the participation rate of disabled households in the Section 8 Program to 30% of all assisted households (while local advocates estimate that 10% of local households have a member that is disabled).

Treatment of Current Tenants Because of Designation: a) SCCHA certifies that no resident who is lawfully residing in a dwelling unit in a public housing development will be evicted or otherwise required to vacate due to the proposed designation.

b) SCCHA does not anticipate pursuing voluntary relocation. Existing residents inconsistent with the proposed designations, shall be extended “grandfathered” status. The new designation provisions shall be achieved through normal unit turnover activity. However, should voluntary relocation occur, SCCHA shall provide the following to persons and families who agree to be relocated in connection with the designations:

- 1) A notice of the designation and explanation of available relocation benefits, as soon as is practical for SCCHA and the person or family;
- 2) Access to comparable housing (including services and design features), which may include a Section 8 Housing Choice Voucher, at a rental rate paid by the tenant that is comparable to that applicable to the unit from which the person or family has vacated.
- 3) Payment of actual, reasonable moving expenses.

c) No resident of a public housing development shall be considered to be displaced for purposes of the Uniform Relocation Assistance and Real Property Acquisition Policy Act of 1970 because of the designation of any existing development or portion thereof.

Eligibility of Near-Elderly Families: If SCCHA determines that there are insufficient numbers of elderly families to fill all the units in a development (or portion of a development) designated for occupancy by only elderly families, the near-elderly shall be considered for occupancy. For this purpose, “near-elderly” shall generally be classified as disabled persons age 55 and above, but may progress downward to include disabled persons as young as 45.

Similarly, if there are no non-elderly disabled on the waiting list for a particular location, SCCHA will consider “elderly” applicants first and then applicants from the general “family” applicant pool.

Evidence of Local Support

This Designation Plan has the support of local county and congressional officials as evidenced by the enclosed letters from St. Clair County Board Chairman, Mark Kern, and U.S. Congressman, Jerry Costello (12th Illinois Congressional District). The “Certificate by State or Local Official of PHA Plans Consistency with the Consolidated Plan” evidences that the proposed Designation Plan is consistent with the housing objectives as contained in the Consolidated Plan for St. Clair County.

Attachment #1

Description of Designated Developments

Dev. #	Location	Designation Type	Supportive Service Provided	Building Design & Facilities
IL30-6 (partial)	Centreville	Elderly Only	Service Coordination *	See Note #1
IL30-16	Belleville	Elderly Only	Service Coordination *	See Note #2
IL30-18	Swansea	Elderly Only	Service Coordination *	See Note #3
IL30-27	Belleville	Elderly Only	Service Coordination *	See Note #4
IL30-21	New Athens	Elderly Only	Service Coordination *	See Note #5
IL30-13 (partial)	New Athens	Non-Elderly Disabled Only	Service Coordination *	See Note #6
IL30-14 (partial)	Lebanon	Non-Elderly Disabled Only	Service Coordination *	See Note #7
IL30-17 (partial)	Washington Park	Non-Elderly Disabled Only	Service Coordination *	See Note #8
IL30-19 (partial)	Lenzburg	Non-Elderly Disabled Only	Service Coordination *	See Note #9

*SCCHA receives a ROSS Grant for a Service Coordinator for Public Housing. These services are provided to both elderly and young disabled households, and represent the only supportive services provided at any location.

Note #1 - The Adeline James Building (AJB) is proposed for designation. It is part of the IL30-06 development, which includes a total of 176 units. AJB is a 34 unit, 5 story building, which was designated for the elderly. AJB has a small common area (sitting area), including a kitchen for special events.

Note #2 - IL30-16 includes two buildings. Bel-Plaza I is a 48 unit, 4 floor, high-rise building. Bel-Plaza II is a 38 unit, 4 floor, high-rise building. Both buildings have a common area (sitting area) and a community room, including a kitchen for special events.

Note #3 - IL30-18, Swansea consists of a cluster of 4 buildings, each with 4 one-bedroom units. Each unit has washer / dryer hook-ups and there is a small community center available for resident special event use.

Note #4 - IL30-27, Amber Court, consists of 64 units contained in a tight cluster of buildings containing from 4 to 8 units each. There is a separate Community Building, that includes a kitchen, that is available for use for special events.

Note #5 - IL30-21, Rickert Station, is a small, 16 unit development in a rural community. The units are located on a tight cluster of duplex and 4-plexes.

Note #6 - IL30-13, Becker Park is a small, rural development, consisting of 16 units. The 12 two-bedroom units were designated as family, with the 4 one-bedroom units designated as elderly. Historically, elderly residents have found Becker Park unsatisfactory due to the family setting.

Note #7 – IL30-14 is a scattered site development located in the small rural community of Lebanon. The development consists of 24 total units; 8 single family houses (all 3-bedroom units), 12 garden style two bedroom units; and 4 one-bedroom units. The one-bedroom units proposed for non-elderly designation are of duplex design and are located within 2 blocks of the downtown area.

Note #8 – IL30-17 is located in Washington Park. This scattered site development includes 20 one-bedroom units clustered at three sites. There is no community buildings or common area facilities. All units are located in close proximity to public transportation and have washer / dryer hook-ups.

Note #9 – IL30-19 is located in the small rural Village of Lenzburg. There are 4 two-bedroom units and 4 one-bedroom units, in a cluster of four duplexes. The designation plan proposes occupancy by non-elderly disabled persons. There is a central laundry on-site.

Attachment #2**Racial Composition of Developments Proposed for Designation**

Dev. #	Location	Designation Type	Occupancy By Race		
			White	Black	Other
IL30-6 (partial)	Centreville	Elderly Only	1	33	0
IL30-13 (partial)	New Athens	Non-Elderly Disabled Only	13	3	
IL30-14 (partial)	Lebanon	Non-Elderly Disabled Only	10	14	
IL30-16	Belleville	Elderly Only	69	14	1
IL30-17 (partial)	Washington Park	Non-Elderly Disabled Only	1	29	
IL30-18	Swansea	Elderly Only	15	1	0
IL30-19 (partial)	Lenzburg	Non-Elderly Disabled Only	7	0	
IL30-21	New Athens	Elderly Only	16	0	0
IL30-27	Belleville	Elderly Only	48	16	0

SECTION 8 HOMEOWNERSHIP PROGRAM CAPACITY STATEMENT

In compliance with HUD guidelines, SCCHA is demonstrating “capacity” to administer a Section 8 Homeownership Program by requiring participating families to meet at least one of the following:

- A minimum homeowner down payment requirement of a least 3 percent and requiring that at least 1 percent of the down payment come from the family’s resources;
- Financing for purchase of a home under its Section 8 Homeownership Program will be provided, insured or guaranteed by the state or Federal government; comply with secondary mortgage market underwriting requirements; or comply with generally accepted private sector underwriting standards.

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 Housing Authority. In accordance with federal regulations, this policy does not apply to animals that assist, support or provide service to persons with disabilities.

Types and Number of Pets

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

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

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

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

All dogs and cats must be spayed or neutered. All cats must have front paws declawed.

Approval/Registration of Pets

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

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

Residents must notify management in writing of their intent to house other pets (i.e. birds, fish, rodents, reptiles) prior to bringing the pet on the premises. Management reserves the right to reasonably refuse, restrict, and/or charge a security deposit for

housing a pet other than a dog/cat, when the circumstance warrant (i.e. increase potential for property damage, resident safety, etc.).

Pet Fees/Security Deposits

Upon approval of a dog/cat or other pet as applicable by the Housing Authority, the resident shall be required to pay a monthly fee of \$5, due with each month's rent payment. A refundable pet deposit of \$200 will be required. The \$5 monthly fee is for general costs to the Housing Authority associated with the presence of pets. The refundable deposit is to cover the costs attributed to damage caused by specific pets. 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, residents residing in high-density developments are prohibited from owning a dog(s). High density is defined as 24 units or more on one continuous site or hi-rise building (i.e. those having four or more floors).

Conditions of Pet Ownership

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

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

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

Should the pet owner become unable to care for their pet for any reason, the name, address and phone number of a least one alternate caretaker for the pet shall be provided to the Housing Authority. In the event the alternate caregiver is unwilling or unable to care for the pet, the local pet control authorities will be contacted to assume control of the

animal until such time as another friend or family member is contacted to assume responsibility of the pet owner.

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

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

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

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

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

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

Visiting Pets/Stray Animals

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

Violations of Pet Ownership Policy

Violation of any part of this policy may result in:

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

and/or

(2). Eviction.

Management's Right to Refuse/Deny

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

Resident's Right to Appeal

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