

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 2008

**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: 07/2008

PHA Programs Administered:

Public Housing and Section 8
 Section 8 Only
 Public Housing Only
 Number of public housing units: 1002
 Number of S8 units:
 Number of public housing units:
 Number of S8 units: 1650

PHA Consortia: (check box if submitting a joint PHA Plan and complete table)

Participating PHAs	PHA Code	Program(s) Included in the Consortium	Programs Not in the Consortium	# of Units Each Program
Participating PHA 1:				
Participating PHA 2:				
Participating PHA 3:				

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: (state mission here) :

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 - pending for FYE-07)

- Improve voucher management: (SEMAP score = 70 FYE-07)
- Increase customer satisfaction:
- Concentrate on efforts to improve specific management functions:
 - Section 8 HCVP Income Projections and Rent Determinations
- Renovate or modernize public housing units:
- Demolish or dispose of obsolete public housing:
- Provide replacement public housing:
- Provide replacement vouchers:
- Other: (list below)

-Continued Development and Refinement of Project Based Budgeting and Asset Management Approach to Public Housing Operations.

- PHA Goal: Increase assisted housing choices

Objectives:

- Provide voucher mobility counseling:
- Conduct outreach efforts to potential voucher landlords
- Increase voucher payment standards (increased to 110% of local FMR)
- 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)

-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 minimum 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)

Annual PHA Plan
PHA Fiscal Year 2008
[24 CFR Part 903.7]

i. Annual Plan Type:

Select which type of Annual Plan the PHA will submit.

Standard Plan

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 Project Based Budgeting and Asset Management Systems to assess each public housing development performance and viability.
- Utilize Capital Fund Program to upgrade / modernize the public housing stock
- Through partnerships with local law enforcement, prevention program services providers and other initiatives reduce the level of drug-related crime in the targeted developments to a level equal to or less than the surrounding neighborhoods
- Develop local homebuyer assistance program serving public housing residents and Section 8 participants (subject to fund availability).

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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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 - il30i02
- FY 2008 Capital Fund Program Annual Statement - il30b02
- Most recent board-approved operating budget (Required Attachment for PHAs that are troubled or at risk of being designated troubled ONLY)
- List of Resident Advisory Board Members – il30d02
- List of Resident Board Member – Vivian Cash
- Community Service Description of Implementation – il30h02
- Information on Pet Policy – il30n02
- Section 8 Homeownership Capacity Statement, if applicable – il30m02
- Description of Homeownership Programs, if applicable

Optional Attachments:

- PHA Management Organizational Chart
- FY 2008 Capital Fund Program 5 Year Action Plan – il30c02
- Public Housing Drug Elimination Program (PHDEP) Plan

- Comments of Resident Advisory Board or Boards (must be attached if not included in PHA Plan text) – il030j02
- Other (List below, providing each attachment name)

il30e02 - Conversion Analysis
 il30f02 - Public Housing Asset Management Table
 il30g02 - Response to Resident Comments Received (Public Hearing Minutes)
 il30i02 - Deconcentration Policy
 il30k02 - Site Based Waiting List Breakdown/Narrative
 il30l02 - Designation Narrative

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;
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

List of Supporting Documents Available for Review		
Applicable & On Display	Supporting Document	Applicable Plan Component
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
X	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 other approved proposal for development of public housing	Annual Plan: Capital Needs
	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

List of Supporting Documents Available for Review		
Applicable & On Display	Supporting Document	Applicable Plan Component
	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
	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	Si-ze	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
Race/Ethnicity							

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: 2005
- 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			
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	7,164	100%	12-15%
Extremely low income <=30% AMI	6,511	91%	
Very low income (>30% but <=50% AMI)	546	8%	
Low income (>50% but <80% AMI)	78	1%	
Families with children	4,550	64%	
Elderly families	241	3%	
Families with Disabilities	998	14%	
Race/ethnicity White	1,377	19%	
Race/ethnicity Black	5,647	79%	
Race/ethnicity Other	176	2%	
Race/ethnicity			

Housing Needs of Families on the Waiting List			
Characteristics by Bedroom Size (Public Housing Only)			
1BR	2,459	34%	
2 BR	2,951	41%	
3 BR	1,652	23%	
4 BR	338	5%	
5 BR	45	<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			

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 all site-based wait 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	5,545	100%	15%
Extremely low income <=30% AMI	5,046	91%	
Very low income (>30% but <=50% AMI)	430	8%	
Low income (>50% but <80% AMI)	64	1%	
Families with children	3,493	63%	
Elderly families	313	6%	
Families with Disabilities	718	13%	
Race/ethnicity			
White	1,037	19%	

Housing Needs of Families on the Waiting List			
Race/ethnicity Black	4,393	79%	
Race/ethnicity Other	143	3%	
Race/ethnicity			
Characteristics by Bedroom Size (Public Housing Only)			
1BR	1,896	34%	
2 BR	2,357	43%	
3 BR	1,094	20%	
4 BR	182	3%	
5 BR	13	<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:

Select if 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 \$	Planned Uses
1. Federal Grants (FY 2007 grants)		
a) Public Housing Operating Fund	2,698,000	
b) Public Housing Capital Fund	1,633,793	
c) HOPE VI Revitalization		
d) HOPE VI Demolition		
e) Annual Contributions for Section 8 Tenant-Based Assistance	9,008,000	
f) Public Housing Drug Elimination Program (including any Technical Assistance funds)		
g) Resident Opportunity and Self-Sufficiency Grants		
h) Community Development Block Grant		

form HUD 50075 (03/2003)

Financial Resources: Planned Sources and Uses		
Sources	Planned \$	Planned Uses
i) HOME		
Other Federal Grants (list below)		
2. Prior Year Federal Grants (unobligated funds only) (list below)		
CFP 501-05 (as of 12/31/07)	0	See Att. P & E Report
CFP 501-06 (as of 12/31/07)	163,032	See Att. P & E Report
3. Public Housing Dwelling Rental Income	1,410,865	
4. Other income (list below)		
Interest Income	90,000	
Entrepreneurial Activities	82,500	
4. Non-federal sources (list below)		
Total resources	15,086,190	

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: (within 25-50)
 When families are within a certain time of being offered a unit: (state time)
 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?**18**

- 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 and according to the number of bedrooms needed)

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)

- SCCHA internet web page at “www.sccha.org”

(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)

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)

- Self-Sufficiency Readmission
- Inter-program Transfers
- Local Disaster Victims
- Law Enforcement/Teachers
- Excessive Rent Burden / Foreclosure

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 of Application

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

NOTE: The waiting lists are organized first by points (i.e. those with the highest preference point total---typically 14 points for public housing), then by date/time of application.

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)

- Self-Sufficiency Re-Admission – 10 points
- Inter-program Transfers – 7 points
- Law Enforcement/Teachers – 6 points
- Local Disaster Victims – 5 points
- Excessive Rent Burden (or in foreclosure) – 1 point

4. Relationship of preferences to income targeting requirements:

- The PHA applies preferences within income tiers for certain locations
- Not applicable:

(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?

Note: ACOP contains needed provisions

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:
- Employing new admission preferences at targeted developments
If selected, list targeted developments below:
- 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:

Ernest Smith Sr. Development, Centreville

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)

Debt to any federal 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) upon request of prospective owner and with written release of participant.

(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:

Due to tight market conditions and other factors all voucher holders are currently given a 120 day search period.

(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, plus in foreclosure situation) = 1 point

Other preferences (select all that apply)

- Working families and those unable to work because of age or disability (2 points)
- Veterans and veterans' families (new for FY-2009) (1 point)
- Residents who live and/or work in your jurisdiction (10 points)
- 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)

- Insufficient Funding Re-admission - 10 points
- Self-Sufficiency Re-Admission - 10 points
- Inter-Program Transfers - 7 points
- Veteran's preference - 1 point

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 (1)
- 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)
 - Insufficient Funding Re-admission - 10 points
 - Self-Sufficiency Re-Admission - 10 points
 - Inter-Program Transfers - 7 points
 - Veteran's preference - 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

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: *See top of next page*

SCCHA has adopted a market-based Flat Rent Schedule. Tenants pay less than 30% of adjusted income when Flat Rent is less than formula based rent.

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 any gross monthly income increase of \$200 or more ;
 - 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)

Due to high increase in utility costs (reduce tenant rent burden resulting from gross rent exceeding payment standard)

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

- Annually
- Other (list below)

-At least every 6 months, but possibly more frequently depending upon budgetary status and other programmatic factors.

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)

-Budgetary Constraints, utility allowance schedule

(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 six functional departments: Administrative, Finance, Management (Public Housing), Maintenance; Modernization, and Section 8. Data Processing is under the direction of Finance. Procurement is considered an administrative function. Application Intake (for all programs) falls under the supervision of the Leasing Manager (i.e. Section 8).

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 2/01/2007	Expected Turnover
Public Housing	940	@ 15%
Section 8 Vouchers	1,470	@ 15%
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.

(1) Public Housing Maintenance and Management: (list below)

- Admissions and Continued Occupancy Policy
- Ban & Bar Policy
- Blood Borne Disease Policy
- Capitalization Policy (includes Disposition Policy)
- Check Signing Policy
- Civil Rights Certification
- Collection Policy
- Criminal Records Management Policy
- Disaster Recovery Plan (Electronic Media)
- Document/Records Retention Policy
- Drug Free Work Place Policy
- Equal Housing Opportunities Policy
- Ethics Policy
- Facilities Use Policy
- Funds Transfer Policy
- Grievance Policy
- Hazardous Materials Policy
- Investment Policy (includes Internal Control Narrative)
- Maintenance Policy (includes Emergency Service Guidelines and Pest Infestation Control Policy)
- Natural Disaster Response Guidelines
- Personnel Policy (includes Drug Abuse Policy, Computer Internet Guidelines, Cellular Phone Usage Guidelines and Travel Policy)
- Pet Policy
- Procurement Policy
- Re-housing Determination Policy (includes Fire Loss)
- Service Charge Policy
- Smoking Policy for Hi-Rise Buildings

(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) il30b02

-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 il30c02

-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: <u>(DD/MM/YY)</u>	
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: Ernest Smith Sr. Apartments, Adeline James Seniors Building 1b. Development (project) number: IL30-06
2. Designation type: Occupancy by only the elderly <input checked="" 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 checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date this designation approved, submitted, or planned for submission: (05/20/05)
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: 32 7. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development

Designation of Public Housing Activity Description

1a. Development name: Bel-Plaza I & II 1b. Development (project) number: IL30-016
2. Designation type: Occupancy by only the elderly <input checked="" 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 checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date this designation approved, submitted, or planned for submission: (05/20/05)
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: 86 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development

Designation of Public Housing Activity Description	
1a. Development name: Amber Court	
1b. Development (project) number: IL30-27	
2. Designation type:	Occupancy by only the elderly <input checked="" 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 checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date this designation approved, submitted, or planned for submission: (05/20/05)	
4. If approved, will this designation constitute a (select one)	
5.	<input type="checkbox"/> New Designation Plan <input type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected: 64	
7. Coverage of action (select one)	<input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development

Designation of Public Housing Activity Description	
1a. Development name: Rickert Station	
1b. Development (project) number: IL30-021	
2. Designation type:	Occupancy by only the elderly <input checked="" 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 checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date this designation approved, submitted, or planned for submission: (05/20/05)	
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: 16	
7. Coverage of action (select one)	<input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development

Designation of Public Housing Activity Description	
---	--

1a. Development name: Swansea
1b. Development (project) number: IL30-18
2. Designation type: Occupancy by only the elderly <input checked="" 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 checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date this designation approved, submitted, or planned for submission: (05/20/05)
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: 16
7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development

Designation of Public Housing Activity Description
1a. Development name: New Athens
1b. Development (project) number: IL30-13
2. Designation type: Occupancy by only the elderly <input type="checkbox"/> Occupancy by families with disabilities <input checked="" 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 checked="" type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date this designation approved, submitted, or planned for submission: (05/20/05)
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: 4
7. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development

Designation of Public Housing Activity Description
1a. Development name: Lebanon
1b. Development (project) number: IL30-14

<p>2. Designation type:</p> <p>Occupancy by only the elderly <input type="checkbox"/></p> <p>Occupancy by families with disabilities <input checked="" type="checkbox"/></p> <p>Occupancy by only elderly families and families with disabilities <input type="checkbox"/></p>
<p>3. Application status (select one)</p> <p>Approved; included in the PHA's Designation Plan <input checked="" type="checkbox"/></p> <p>Submitted, pending approval <input type="checkbox"/></p> <p>Planned application <input type="checkbox"/></p>
<p>4. Date this designation approved, submitted, or planned for submission: <u>(05/20/05)</u></p>
<p>5. If approved, will this designation constitute a (select one)</p> <p><input type="checkbox"/> New Designation Plan</p> <p><input type="checkbox"/> Revision of a previously-approved Designation Plan?</p>
<p>6. Number of units affected: 4</p> <p>7. Coverage of action (select one)</p> <p><input checked="" type="checkbox"/> Part of the development</p> <p><input type="checkbox"/> Total development</p>

Designation of Public Housing Activity Description
<p>1a. Development name: Washington Park</p> <p>1b. Development (project) number: IL30-17</p>
<p>2. Designation type:</p> <p>Occupancy by only the elderly <input type="checkbox"/></p> <p>Occupancy by families with disabilities <input checked="" type="checkbox"/></p> <p>Occupancy by only elderly families and families with disabilities <input type="checkbox"/></p>
<p>3. Application status (select one)</p> <p>Approved; included in the PHA's Designation Plan <input checked="" type="checkbox"/></p> <p>Submitted, pending approval <input type="checkbox"/></p> <p>Planned application <input type="checkbox"/></p>
<p>4. Date this designation approved, submitted, or planned for submission: <u>(05/20/05)</u></p>
<p>5. If approved, will this designation constitute a (select one)</p> <p><input type="checkbox"/> New Designation Plan</p> <p><input type="checkbox"/> Revision of a previously-approved Designation Plan?</p>
<p>6. Number of units affected: 20</p> <p>7. Coverage of action (select one)</p> <p><input checked="" type="checkbox"/> Part of the development</p> <p><input type="checkbox"/> Total development</p>

Designation of Public Housing Activity Description
<p>1a. Development name: Lenzburg</p> <p>1b. Development (project) number: IL30-19</p>

<p>2. Designation type:</p> <p>Occupancy by only the elderly <input type="checkbox"/></p> <p>Occupancy by families with disabilities <input checked="" type="checkbox"/></p> <p>Occupancy by only elderly families and families with disabilities <input type="checkbox"/></p>
<p>3. Application status (select one)</p> <p>Approved; included in the PHA's Designation Plan <input checked="" type="checkbox"/></p> <p>Submitted, pending approval <input type="checkbox"/></p> <p>Planned application <input type="checkbox"/></p>
<p>4. Date this designation approved, submitted, or planned for submission: <u>(05/20/05)</u></p>
<p>5. If approved, will this designation constitute a (select one)</p> <p><input type="checkbox"/> New Designation Plan</p> <p><input type="checkbox"/> Revision of a previously-approved Designation Plan?</p>
<p>6. Number of units affected: 4</p> <p>7. Coverage of action (select one)</p> <p><input checked="" type="checkbox"/> Part of the development</p> <p><input type="checkbox"/> Total development</p>

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)

- Units addressed in a pending or approved demolition application (date submitted or approved: _____)
- Units addressed in a pending or approved HOPE VI demolition application (date submitted or approved: _____)
- Units addressed in a pending or approved HOPE VI Revitalization Plan (date submitted or approved: _____)
- Requirements no longer applicable: vacancy rates are less than 10 percent
- Requirements no longer applicable: site now has less than 300 units
- 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) <input type="checkbox"/> Part of the development <input type="checkbox"/> 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: *See Section 8 HCVP Homeownership Policy*

12. PHA Community Service and Self-sufficiency Programs

[24 CFR Part 903.7 9 (1)]

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 has 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)
<i>Family Resource Center (I &R)</i>	<i>50-75</i>	<i>Open Enrollment</i>	<i>Development Office (2)</i>	<i>Public Housing</i>
<i>Local Family Self-Sufficiency Program</i>	<i>@ 25</i>	<i>Other</i>	<i>Main Office</i>	<i>Public Housing</i>

(2) Family Self Sufficiency program/s

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.

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 use 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)
 Washington Park – IL30-17

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 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

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) il30j02
 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)
Resident Advisory Board input used in development of this 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)

- Activities to promote first time homebuyers initiatives
- Section 8 Project Based Vouchers to increase availability of larger family rentals (3 bedroom units)

- Other: (list below)

- Improve Public Housing stock through Capital Grants Fund
- Development of Project-based Accounting and Asset Management Practices

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

This section lists any attachments referenced in the Plans.

- il030a02 - Admission and Continued Occupancy Policy
- il030b02 - Annual Statement Capital Fund Program – Part 1 – 501-05
Annual Statement Capital Fund Program – Part 2 – 501-06
Annual Statement Capital Fund Program – Part 3 – 501-07
- il030c02 - Five Year Action Plan – Part 1 (Year 1)
Five Year Action Plan – Part 2 (Years 2 - 4)
- il030d02 - Resident Advisory Board Membership Roster
- il030e02 - Conversion Analysis
- il030f02 - Public Housing Asset Management Table
- il030g02 - Response to Resident Comments Received (Public Hearing Minutes)
- il030h02 - Community Service Policy
- il030i02 - Deconcentration Policy & Related Analysis
- il030j02 - Resident Advisory Board Meeting Minutes
- il030k02 - Site Based Waiting List Breakdown/Narrative
- il030l02 - Designation Narrative
- il030m02- Section 8 Homeownership Capacity Statement & Policy
- il030n02 - Pet Policy
- il030o02 - Policy Compliance Statement Regarding Carbon Monoxide Detector Act
- il030p02 – Policy Compliance Statement Regarding VAWA

Supporting Documentation (Not included in package, but available upon request)

- Management Needs Assessment
- Management Improvement 5-Year Projections
- Public Housing Flat Rent Schedule
- Section 8 Administrative Plan
- Section 8 Procedures for Informal Reviews and Informal Hearings
- Annual Plan Status Report
- Five-Year Plan Status Report
- Resident Survey Follow-up Plan (not applicable, program suspended by HUD)
- Utility Allowance - Schedules Section 8 /Public Housing
- Public Housing Grievance Policy

*Not applicable/available during comment period.

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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 ACCOMMODATION

- 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 Housing 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

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

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

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

Definitions

As used in VAWA:

- 1. The term domestic violence includes felony or misdemeanor crimes of violence committed by a current or former spouse of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant

monies, or by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction.

2. The term *dating violence* means violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim; and where the existence of such a relationship shall be determined based on a consideration of the following factors:
 - a. The length of the relationship
 - b. The type of relationship
 - c. The frequency of interaction

3. The term *stalking* means:
 - a. To follow, pursue, or repeatedly commit acts with the intent to kill, injure, harass, or intimidate; or
 - b. To place under surveillance with the intent to kill, injure, harass, or intimidate another person; and
 - c. In the course of, or as a result of, such following, pursuit, surveillance, or repeatedly committed acts, to place a person in reasonable fear of the death of, serious bodily injury to, or to cause substantial emotional harm to (1) that person, (2) a member of the immediate family of that person, or (3) the spouse or intimate partner of that person.

4. The term *immediate family member* means, with respect to a person:
 - a. A spouse, parent, brother or sister, or child of that person, or an individual to whom that person stands in the position or place of a parent; or
 - b. Any other person living in the household of that person and related to that person by blood and marriage.

Notification and Victim Documentation

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

member of the applicant family is or has been a victim of domestic violence, dating violence, or stalking.

The documentation must include two elements:

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

The applicant must submit the required documentation within 10 days of the informal review or must request an extension in writing at that time. If the applicant so requests, the SCCHA will grant an extension of 10 business days, and will delay issuance of the informal review determination until after it has received the documentation or the extension period has elapsed. If after reviewing the documentation provided by the applicant the SCCHA determines the family is eligible for assistance, a favorable decision notice will be issued and SCCHA will proceed with admission of the applicant family. If SCCHA determines the family is not eligible for assistance, an adverse decision notice will be issued.

Perpetrator Removal or Documentation of Rehabilitation

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

If the family elects the second option, the documentation must be signed by an employee or agent of a domestic violence service provider or by a medical or other knowledgeable professional from whom the perpetrator has sought or is

receiving assistance in addressing the abuse. The signer must attest under penalty of perjury to his or her belief that the rehabilitation was successfully completed or is progressing successfully. The victim and perpetrator must also sign or attest to the documentation. This additional documentation must be submitted within the same time frame as the documentation required from the victim.

Confidentiality Requirements

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

8.6 *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. **Preferences** – used to determine rank order of applications among the group of applicants qualifying for routine admission.
 - a) ***Jurisdictional – 10 points***
Applicants who live, work or who have a bona fide offer to work in SCCCHA’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.)

If this preference is award to applicant based upon employment, applicant must have worked a minimum average often (10) hours per week for a period of three months. If the preference is

awarded to applicant based upon participation in education program, applicant must be a full-time student (as determined by the institution) at a recognized institution of higher learning as defined by HUD.

- d) **Excessive Rent / Housing Cost Burden – 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. A family under foreclosure may also qualify for this preference following the same process outlined (i.e. mortgage payment plus utility estimate exceeds 50% of monthly gross income).
- e) **Inter-Program Transfers/Accommodations – 7 points – Applied as described below:**
- i) *Transfers (i.e. Between Public Housing, Section 8 HCVP, 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.*
- f) **Law Enforcement Officials/Teachers – 6 points**
Given to full-time law enforcement personnel and/or teachers to encourage residency in public housing.
- g) **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.

h) ***Self-Sufficiency Re-Admission – 10 points***

This preference is granted to a family that has vacated a public housing unit within the last 12 months for self-sufficiency purposes but experiences a change in circumstance that results in a renewed need for federally assisted housing. This preference is also granted to elderly or disabled families who had to give up their unit due to placement in a medical institution.

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 date 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.

1. 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*

2.

3. 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. The sum of the following, to the extent that the sum exceeds three percent of annual income: (i) Unreimbursed medical expenses of any elderly family or disabled family; (ii) Unreimbursed reasonable attendant care and auxiliary apparatus expenses for each member of the family who is a person with disabilities, to the extent necessary to enable any member of the family (including the member who is a person with disabilities) to be employed. This deduction may not exceed the earned income received by family members who are 18 years of age or older and who are able to work because of such attendant care or auxiliary apparatus; and
- D. Any reasonable child care expenses necessary to enable a member of the family to be employed or to further his or her education.

11.4 Qualifying Medical Expenses

HUD regulations define medical expenses at 24 CFR 5.603(b) to mean “medical expenses, including medical insurance premiums, that are anticipated during the period for which annual income is computed, and that are not covered by insurance.” SCCHA will use the most current IRS Publication 502, Medical and Dental Expenses to determine the costs that qualify as medical expenses.

Summary of Allowable Medical Expenses from IRS Publication 502

Services medical professionals;
 Surgery and medical procedures that are necessary, legal, non-cosmetic;
 Services of medical facilities;
 Hospitalization, long-term care, and in-home nursing services;
 Prescription medicines and insulin, but not non-prescription medicines even if recommended by a doctor;
 Improvements to housing directly related to medical needs (e.g. ramps for a wheel chair, handrails);
 Substance abuse treatment programs;
 Psychiatric treatment;
 Ambulance services and some costs of transportation related to medical treatment;
 The cost and care of necessary equipment related to a medical condition (e.g. eye-glasses, contact lenses, hearing aids, crutches, and artificial teeth);
 Cost and continuing care of necessary service animals;
 Medical insurance premiums or the costs of health maintenance organization (HMO)

Notes:

#1 This chart provides a summary of potentially eligible expenses only. Detailed information is provided in IRS Publication 502. Medical expenses are considered

only to the extent they are not reimbursed by insurance or some other source.

#2 Cell phone expenses will not be counted as medical expenses. SCCHA will recognize the cost of “emergency response” services / products (i.e. Life Line Services) as medical expenses.

11.4 Qualifying Disability Assistance Expenses

Reasonable expenses for attendant care and auxiliary apparatus for a disabled family member may be deducted if they: (1) are necessary to enable a family member 18 years or older to work, (2) are not paid to a family member or reimbursed by an outside source, (3) in combination with any medical expenses, exceed three percent of annual income, and (4) do not exceed the earned income received by the family member who is enabled work.

Earned Income Limit on the Disability Assistance Expense deduction

A family can qualify for the disability assistance expenses deduction only if at least one family member (who may be the person with disabilities) is enabled to work (24 CFR 5.603(b)). The disability expense deduction is capped by the amount of “earned income received by family members who are 18 years of age or older and who are able to work” because of the expense. The earned income used for this purpose is the amount verified before any earned income disallowances or income exclusions are applied.

The family must identify the family member(s) enabled to work as a result of the disability assistance expenses. In evaluating the family’s request, SCCHA will consider factors such as how the work schedule of the relevant family members relates to the hours of care provided, the time required for transportation, the relationship of the family members to the person with disabilities, and any special needs of the person with disabilities that might determine which family members are enabled to work. When SCCHA determines that the disability assistance expenses enable more than one family member to work, the expenses will be capped by the sum of the family members’ incomes.

Eligible Disability Expenses

Examples of auxiliary apparatus are items such as wheelchairs, ramps, adaptations to vehicles, or special equipment to enable a blind person to read or type, but only if these items are directly related to permitting the disabled person or other family member to work. Expenses incurred for maintaining or repairing an auxiliary apparatus are eligible. In case of an apparatus that is specially adapted to accommodate a person with disabilities (e.g., a vehicle or computer), the cost to maintain the special adaptations (but not maintenance of the apparatus itself) is an eligible expense. The cost of service animals trained to give assistance to persons with disabilities, including the costs of acquiring the animal, veterinary care, food,

grooming, and other continuing costs of care, will be included.

Eligible Attendant Care

Attendant care includes, but is not limited to, reasonable costs for home medical care, nursing services, in-home or center-based care services, interpreters for persons with hearing impairments, and readers for persons with visual impairments.

Attendant care expenses will be included for the period that the person enabled to work is employed plus reasonable transportation time. The cost of general housekeeping and personal services is not an eligible attendant care expense. However, if the person enabled to work is the person with disabilities, personal services necessary to enable the person with disabilities to work are eligible.

If the care attendant also provides other services to the family, SCCHA will prorate the cost and allow only that portion of the expenses attributable to attendant care that enables a family member to work.

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. HUD's Enterprise Income Verification (EIV) and other Upfront Income Verification (UIV) System
2. Third-party written verification
3. Third-party oral verification
4. Review of documents
5. Certification/self-declaration

EIV and UIV Verification

The SCCHA will utilize up-front income verification tools, including Tenant Income Data (TID) reports, Electronic Verification from the Illinois Department of Human Services (IDPA) for TANF, the Work Number, and other electronic verification tools when available.

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 received 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. ***Third party verification will not be pursued when verifying assets (i.e. checking / savings accounts, etc.) with an anticipated market value of less than \$1,000. Document / statement review will be used.***

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)
- Periodic statements issued by an independent source (i.e. bank statements)
- 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 EIV 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	3rd 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 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

Verification Requirements for Individual Items		
Item to Be Verified	3 rd party verification	Hand-carried verification
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 worth
Income		
Earned income	Electronically from HUD's EIV 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.,	Letter or electronic reports from the	Award letter, letter announcing

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 be 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:

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

- F. 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.
- G. Subtract the family's total resident payment from the maximum rent. The resulting number is called the maximum subsidy.
- H. 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.
- I. 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 determined that individual relief is warranted, the amount of the relief shall be determined based on the difference between the actual costs incurred and the average cost for a similar time period prior to the occurrence of the condition that resulted in the excess consumption. The relief determined appropriate 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 be 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 gross income or decreases in allowable expenses (i.e. deductions to annual income such as child care costs) of \$200 or more between annual reexaminations when any of the following apply:

- The family receives a Utility Reimbursement Payment (i.e. has a negative rent);
- A family member starts receiving a new non-wage benefit amount such as Social Security/SSI, TANF benefits, etc.
- The increase in income or decrease in expense deductions could have reasonably been anticipated by the family at the time of the recertification (e.g. seasonal / temporary employment assignments, pending job application, in an on-the-job training program, etc.).

The change(s) must be reported by the family within 10 days of the date the change takes effect.

Families not impacted by the three 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 15.9.

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 METHOD OF REPORTING CHANGES BETWEEN ANNUAL RECERTIFICATIONS

Families required to report changes in household income and/or expenses and/or family composition between annual recertifications as described in the previous sections must do so on SCCHA form(s) specifically designated for this purpose and are available in all SCCHA offices. The form must be completed, signed and dated by the Head of the Household and receipt must be acknowledged by an SCCHA staff member's signature and dated. The family is provided a copy to keep for their records as evidence of reporting compliance. Failure to comply with the required reporting method may subject the family to adverse action, including retro-active rent charges and/or lease termination.

15.8 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.

15.9 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, 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.

15.10 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.

15.11 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

15.12 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***

15.13 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.

15.14 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:

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

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

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

VAWA does not limit the authority of SCCHA to terminate the assistance of any participant if SCCHA “can demonstrate an actual and imminent threat to other tenants

or those employed at or providing service to the property if that tenant is not evicted or terminated from assistance.”

1. Victim Documentation

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

The documentation must include two elements:

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

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

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

2. Terminating the Lease of a Domestic Violence Perpetrator

Although VAWA provides lease termination protection for victims of domestic violence, it does not provide protection for perpetrators. VAWA gives SCCHA the explicit authority to “terminate assistance to any individual who is a tenant or

lawful occupant and who engages in criminal acts of physical violence against family members or others...without terminating assistance to, or otherwise penalizing the victim of such violence who is a tenant or lawful occupant.” This authority supersedes any local, state, or federal law to the contrary. However, if SCCHA chooses to exercise this authority, it must follow any procedures prescribed by HUD or applicable local, state, or federal law regarding termination of assistance [Pub.L. 109-271].

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

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

3. PHA Confidentiality Requirements

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

4. Termination Notice

If a family’s lease is to be terminated, involuntarily, SCCHA must give the family written notice that specifies:

- a. The reasons for which the lease has been terminated
- b. The effective date of the termination
- c. The family’s right to an informal hearing

If a criminal record is the basis of the termination, a copy of the record must accompany the notice. A copy of the criminal record also must be provided to the subject of the record [24 CFR 982.553(d)].

When termination is initiated by SCCHA, the notice to terminate will be sent to the family at least 30 calendar days prior to the effective date of the termination. However, if a family vacates the unit without informing SCCHA, 30 days notice will not be given. In these cases, the termination will be effective the date SCCHA learns the family has vacated the unit.

When a family gives notice of lease termination they must do so in writing to SCCHA. SCCHA will then send a confirmation notice to the family.

20.4 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.

20.5 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)

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

ST. CLAIR COUNTY HOUSING AUTHORITY

REVISED INCOME LIMITS ALL PROGRAMS

EFFECTIVE MARCH 2008

<u># OF PERSONS</u>	<u>30% OF MEDIAN</u>	<u>VERY LOW INCOME</u>	<u>LOW INCOME</u>
1	\$13,850	\$23,050	\$36,900
2	\$15,800	\$26,350	\$42,200
3	\$17,800	\$29,650	\$47,450
4	\$19,750	\$32,950	\$52,700
5	\$21,350	\$35,600	\$56,950
6	\$22,950	\$38,200	\$61,150
7	\$24,500	\$40,850	\$65,350
8	\$26,100	\$43,500	\$69,600

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	\$200.00
Pet Deposit – Family	\$200.00

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 FORMULA AMOUNT 7/25/05	Grant Type and Number Capital Fund Program Grant No: IL60P030501-05 Replacement Housing Factor Grant No:	Federal FY of Grant: 2005 REV. 6a Dec. 2007 LOCCS figures
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Original Annual Statement
 Reserve for Disasters/ Emergencies
 Revised Annual Statement (revision no: 6a)
 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		25,950.17	25,950.17	25,950.17
3	1408 Management Improvements	134,000	134,500	134,500	113,903
4	1410 Administration	284,136	284,136	284,136	284,136
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs	69,100	69,100	69,100	69,100
8	1440 Site Acquisition				
9	1450 Site Improvement	194,288	216,973.86	216,973.86	216,974
10	1460 Dwelling Structures	869,027	833,353.97	833,353.97	833,354.00
11	1465.1 Dwelling Equipment— Nonexpendable	23,844	23,844	23,844	23,844
12	1470 Nondwelling Structures	0	0		
13	1475 Nondwelling Equipment	67,056	53,593	53,593	53,593
14	1485 Demolition	0	0		
15	1490 Replacement Reserve	0	0		
16	1492 Moving to Work Demonstration	0	0		
17	1495.1 Relocation Costs	0	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 REV. 6a Dec. 2007 LOCCS figures
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Original Annual Statement
 Reserve for Disasters/ Emergencies
 Revised Annual Statement (revision no: 6a)
 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	0		
19	1501 Collateralization or Debt Service	0	0		
20	1502 Contingency	0	0		
21	Amount of Annual Grant: (sum of lines 2 – 20)	1,641,451	1,641,451	1,641,451	1,620,854
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 REV. 6a Dec 2007 LOCCS figures		
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	745,172	706,421.62	706,421.62	706,421.62	Comp.
IL30-03 Dupo	Site Improvement	1450	1	0	0	0	0	
IL30-06 Centreville	Site Improvements	1450	1	25,000	23,254	23,254	23,254	23,254
	Exterior Improvements	1460	1	35,000	33,221.82	33,221.82	33,221.82	Comp.
IL30-08 Centreville	Site Improvements	1450	1	25,000	25,000	25,000	25,000	
	Bath/Washer Dryer Hook-ups	1460	12	88,855	93,710.53	93,710.53	93,710.53	Comp.
	HVAC Replacement	1465		23,844	23,844	23,844	23,844	Comp.
IL30-16 Belleville	Parking lot/retaining wall rehab.	1450	1	144,288	168,719.86	168,719.86	168,719.86	23,254
	Vehicles	1475	5	52,056	39,093	39,093	39,093	Comp.
	Contingency	1502		0	0	0	0	

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 REV. 6a Dec 2007 LOCCS figures			
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	284,136	284,136	284,136	Comp.
	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 REV. 6a Dec 2007 LOCCS figures			
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		5,000	4779.98	4779.98	4779.98	Complete
Management	Technical services staff professional development	1408		5,000	5,000	5,000	5,000	Complete
Improvements	Service coordination & support activities	1408		20,000	37,720.02	37,720.02	37,720.02	Complete
	Economic development	1408		15,000	0	0	0	Revised
	Family self-sufficiency	1408		35,000	3919	3,919	3,919	Complete
	Resident council development & training	1408		12,000	1,077	1,077	1,077	
	Drug elimination program	1408		40,000	82,003.85	82,003.85	61,407	Rev. 5 change
	Computer software	1408		2,000	0	0	0	
	Computers & related equipment	1475		15,000	14,500	14,500	14,500	
HA Wide	Architect & Engineering Services	1430		80,000	69,100	69,100	69,100	

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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Annual Statement/Performance and Evaluation Report

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: IL60P030501-06 Replacement Housing Factor Grant No:	Federal FY of Grant: 2006 REV. 3 LOCCS Dec. 2007 CORRECTED
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Original Annual Statement
 Reserve for Disasters/ Emergencies
 Revised Annual Statement (revision no: 3)
 Performance and Evaluation Report for Period Ending:
 Final Performance and Evaluation Report

Line No.	Summary by Development Account	Total Estimated Cost		Total Actual Cost	
		Original	Revised	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations	103,905	103,905	103,905	103,905
3	1408 Management Improvements	121,500	121,500	66,000	28,258
4	1410 Administration	195,231	195,231	195,231	195,231
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs	70,000	70,000	70,000	68,238
8	1440 Site Acquisition				
9	1450 Site Improvement	65,239	313,373	313,373	221,045
10	1460 Dwelling Structures	900,000	716,234	673,099	673,099
11	1465.1 Dwelling Equipment— Nonexpendable				
12	1470 Nondwelling Structures				
13	1475 Nondwelling Equipment	74,500	67,132	49,632	49,632
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: IL60P030501-06 Replacement Housing Factor Grant No:	Federal FY of Grant: LOCCS Dec. 2007 REV. 3 CORRECTED
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Original Annual Statement
 Reserve for Disasters/ Emergencies
 Revised Annual Statement (revision no: 1)
 Performance and Evaluation Report for Period Ending:
 Final Performance and Evaluation Report

Line 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	103,897	46,897		
21	Amount of Annual Grant: (sum of lines 2 – 20)	1,634,272	1,634,272	1,471,240	1,339,408
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: IL60P030501-06 Replacement Housing Factor Grant No:				Federal FY of Grant: 2006 Dec. 2007 REV. 3		
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	900,000	716,234	673,099	673,099	In progress
IL30-03 Dupo	Site Improvements	1450	1	42,239	42,839	42,839	42,839	In progress
IL30-06 Centreville	Parking Rehabilitation/Site	1450	1	180,107	261,534	261,534	169,206	In progress
IL30-16 Belleville	Vehicle Replacement	1475	4	57,000	49,632	49,632	49,632	Complete
IL30-22 Millstadt	Parking Rehabilitation	1450	1	9,000	9,000	9,000	9,000	Complete
	Contingency	1502		103,897	46,897			

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: IL60P030501-06 Replacement Housing Factor Grant No:				Federal FY of Grant: 2006 Dec. 2007, REV. 3		
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	195,231		195,231	195,231	Complete
	Director	1410	1	84,000				
	Project Manager	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 David Wright, Modernization 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: IL60P030501-06 Replacement Housing Factor Grant No:			Federal FY of Grant: 2006 Dec. 2007 LOCCS, REV. 3			
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		0		Error July 07 – wrong line
Management	Technical services staff professional development	1408		6,000		6,000	1975	In progress
Improvements	Service coordination & support activities	1408		20,000		20,000	20,650	In progress
	Economic development	1408		0				
	Family self-sufficiency	1408		35,000				
	Resident council development & training	1408		12,000				
	Drug elimination program	1408		40,000		40,000	5,633	In progress
	Computer software	1408		2,500				
	Computers & related equipment	1475		17,500				
HA Wide	Architect & Engineering Services	1430		70,000		\$70,000	\$68,238	In progress

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: IL06P030501-06 Replacement Housing Factor No:	Federal FY of Grant: 2006 REV. 3
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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	07/17/08			07/17/2010			
IL30-03 Dupo	07/17/08			07/17/2010			
IL30-06 Centreville	07/17/08			07/17/2010			
IL30-08 Centreville	07/17/08			07/17/2010			
IL30-16 Belleville	07/17/08			07/17/2010			
HA Wide	07/17/08			07/17/2010			

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 I: Summary

PHA Name: St. Clair County Housing Authority Formula Amount 8/27/2007	Grant Type and Number Capital Fund Program Grant No: IL60P030501-07 Replacement Housing Factor Grant No:	Federal FY of Grant: 2007 LOCCS Dec 2007
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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	158,737		158,737	
3	1408 Management Improvements	126,500			
4	1410 Administration	195,231		195,231	63,677
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs	70,000		68,500	
8	1440 Site Acquisition				
9	1450 Site Improvement	223,835			
10	1460 Dwelling Structures	730,000			
11	1465.1 Dwelling Equipment— Nonexpendable				
12	1470 Nondwelling Structures				
13	1475 Nondwelling Equipment	2,500			
14	1485 Demolition	0			
15	1490 Replacement Reserve	0			
16	1492 Moving to Work Demonstration	0			
17	1495.1 Relocation Costs	0			
18	1498 Mod Used for Development	0			

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: IL60P030501-07 Replacement Housing Factor Grant No:	Federal FY of Grant: 2007
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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
19	1502 Contingency	126,990			
20	Amount of Annual Grant: (sum of lines 2 – 20)	1,633,793		422,468	63,677
21	Amount of line 20 Related to LBP Activities	0			
22	Amount of line 20 Related to Section 504 compliance	0			
23	Amount of line 20 Related to Security	0			
24	Amount of Line 20 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: IL60P030501-07 Replacement Housing Factor Grant No:				Federal FY of Grant: 2007		
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	Exterior Building Rehabilitation	1460	7	\$525,000				
	Site Improvements	1450	1	\$151,606				
IL30-12 Brooklyn	Exterior Building Rehabilitation	1460	8	\$165,000				
	Site Improvements	1450	1	\$47,229				
IL30-16 Belleville	Fire System Upgrade	1460	2	\$40,000				
	Trash Upgrades	1450	2	\$25,000				

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: IL60P030501-07 Replacement Housing Factor Grant No:				Federal FY of Grant: 2007		
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	195,231		195,231	63,677	
	Director	1410	1	84,000				
	Project Manager	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 David Wright, Modernization 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: IL60P030501-07 Replacement Housing Factor Grant No:				Federal FY of Grant: 2007		
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		40,000				
	Economic development	1408		0				
	Family self-sufficiency	1408		5,000				
	Resident council development & training	1408		12,000				
	Drug elimination program	1408		40,000				
	Computer software	1408		17,500				
	Computers & related equipment	1475		2,500				
HA Wide	Architect & Engineering Services	1430		70,000				

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: IL06P030501-07 Replacement Housing Factor No:	Federal FY of Grant: 2007
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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	09/13/09			09/13/10			
IL30-12 Brooklyn	09/13/09			09/13/10			
IL30-16 Belleville	09/13/09			09/13/10			
HA Wide	09/13/09			09/13/10			

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 I: Summary

PHA Name: St. Clair County Housing Authority	Grant Type and Number Capital Fund Program Grant No: IL60P030501-08 Replacement Housing Factor Grant No:	Federal FY of Grant: 2008
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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	100,000 *			
3	1408 Management Improvements	121,500			
4	1410 Administration	200,000			
5	1411 Audit	0			
6	1415 Liquidated Damages	0			
7	1430 Fees and Costs	70,000			
8	1440 Site Acquisition	0			
9	1450 Site Improvement	171,335			
10	1460 Dwelling Structures	155,000			
11	1465.1 Dwelling Equipment— Nonexpendable	540,000			
12	1470 Nondwelling Structures	0			
13	1475 Nondwelling Equipment	117,500			
14	1485 Demolition	0			
15	1490 Replacement Reserve	0			
16	1492 Moving to Work Demonstration	0			
17	1495.1 Relocation Costs	0			
18	1498 Mod Used for Development	0			

Annual Statement/Performance and Evaluation Report

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: IL60P030501-08 Replacement Housing Factor Grant No:	Federal FY of Grant: 2008
--	--	------------------------------

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
19	1502 Contingency	100,000 *			
20	Amount of Annual Grant: (sum of lines 2 – 20)	1,575,335 *	*Dependent on final formula amount		
21	Amount of line 20 Related to LBP Activities	0			
22	Amount of line 20 Related to Section 504 compliance	0			
23	Amount of line 20 Related to Security	0			
24	Amount of Line 20 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: IL60P030501-08 Replacement Housing Factor Grant No:				Federal FY of Grant: 2008		
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	HVAC	1465	100	\$540,000				
IL30-06 Centreville	Site Improvements	1450	1	\$14,106				
IL30-08 Centreville	Site Improvements	1450	1	\$20,000				
IL30-10 Centreville	Site Improvements	1450	1	\$45,000				
	Security System Improvements	1475	9	\$100,000				
IL30-11 Alorton	Site Improvements	1450	1	\$37,229				
IL30-18 Swansea	Countertops	1460	16	\$20,000				
	Site Work	1450	1	\$35,000				

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: IL60P030501-08 Replacement Housing Factor Grant No:			Federal FY of Grant: 2008			
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	200,000				
	Director	1410	1	86,000				
	Project Manager	1410	1	55,000				
	Modernization Manager	1410	1	59,000				
	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 David Wright, Modernization 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: IL60P030501-08 Replacement Housing Factor Grant No:			Federal FY of Grant: 2008			
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 Improvements	Technical services staff professional development	1408		6,000				
	Resident Services Coordination & Technical Support Activities	1408		50,000				
	Family self-sufficiency	1408		5,000				
	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		70,000				

**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: IL06P030501-08 Replacement Housing Factor No:					Federal FY of Grant: 2008		
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	09/30/10			09/30/12			ALL DATES SUBJECT TO THE SCHEDULE SET BY HUD WHEN THE FORMULA AMOUNT BECOMES AVAILABLE. TO BE REVISED WITH FINAL FORMULA AMOUNT		
IL30-06 Centreville	09/30/10			09/30/12					
IL30-08 Centreville	09/30/10			09/30/12					
IL30-10 Centreville	09/30/10			09/30/12					
IL30-11 Alorton	09/30/10			09/30/12					
IL30-18 Swansea	09/30/10			09/30/12					
IL30-21 New Athens	09/30/10			09/30/12					
IL30-27 Belleville	09/30/10			09/30/12					
HA Wide	09/30/10			09/30/12					
Signature of Executive Director				Date		Signature of Public Housing Official			Date

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 2008 <input type="checkbox"/> Revision No:			
Development Number/Name/HA-Wide	Year 1	Work Statement for Year 2 FFY Grant: 501-09 PHA FY: 2009	Work Statement for Year 3 FFY Grant: 501-10 PHA FY: 2010	Work Statement for Year 4 FFY Grant: 501-11 PHA FY: 2011	Work Statement for Year 5 FFY Grant: 501-12 PHA FY: 2012
IL30-01 Brooklyn	Annual Statement				513,333
IL30-02 Marissa					13,333
IL30-03 Dupo					13,333
IL30-05 Smithton					13,333
IL30-06 Centreville		941,335		646,000	33,333
IL30-07 Marissa					
IL30-08 Centreville					38,333
IL30-09 Brooklyn					
IL30-10 Centreville				180,000	38,333
IL30-11 Alorton					13,333
IL30-12 Brooklyn					13,333
IL30-13 New Athens			267,000		13,333
IL30-14 Lebanon					13,333
IL30-16 Belleville		25,000		70,355	129,675
IL30-17 Wash. Park					13,333
IL30-18 Swansea				70,000	13,333
IL30-19 Lenzburg					13,333
IL30-20 Centreville					13,333
IL30-21 New Athens			307,000		13,333
CFP Funds Listed for 5- year planning		Continued on next page	Continued on next page	Continued on next page	Continued on next page
Repl.Hous.Factor Funds					

Note: Administration may increase yearly with Board approved cost of living increases.

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: 501-09 PHA FY: 2009	Work Statement for Year 3 FFY Grant: 501-10 PHA FY: 2010	Work Statement for Year 4 FFY Grant: 501-11 PHA FY: 2011	Work Statement for Year 5 FFY Grant: 501-12 PHA FY: 2012
IL30-22 Millstadt	Annual Statement		344,106		13,333
IL30-24 OFallon					13,333
IL30-27 Belleville			48,229		13,333
IL30-28 Lenzburg					13,333
HA wide Mgmt. Impv.		121,500	121,500	121,500	121,500
HA wide Admin.		200,000	200,000	200,000	200,000
HA Wide A&E		70,000	70,000	70,000	70,000
Contingency		100,000	100,000	100,000	100,000
Operating		100,000	100,000	100,000	100,000
CFP Funds Listed for 5- year planning		1,557,835	1,557,835	1,557,855	1,557,835
Repl.Hous.Factor Funds					

Note: Administration may increase yearly with Board approved cost of living increases.

RESIDENT ADVISORY BOARD OF THE
ST. CLAIR COUNTY HOUSING AUTHORITY

Ms. Jessie Hooper, Secretary
4621 Hallows Avenue
Washington Park, IL 62204
Section 8 Resident

Ms. Vivian Cash*
Treasurer, Ernest Smith Sr. Resident Council
4647 Trendley
Centreville, IL 62207
Public Housing Resident

Ms. Melanie Sanders
Brooklyn Resident Council
600 South 6th Street, Apt. 131
Brooklyn, IL 62059
Public Housing Resident

Ms. Lillie Smith
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. Kay Reisch
4101 Amber Court, Apt. C
Belleville, IL 62226
Public Housing Resident

Ms. Lashawanda Dotts
316A Greystone Drive
Alorton, IL 62207
Section 8 New Construction
Resident

Mr. Larry McLean, Deputy Director
St. Clair County Housing Authority
1790 South 74th Street
Belleville, IL 62223

Ms. Lucille Rains, Vice-Chairman
114 S. Church St, Apt. 209
Belleville, IL 62220
Public Housing Resident

Ms. Earline Jenkins,
RAB Chairman
115 N. 47th St., Apt. 215
Belleville, IL 62226
Public Housing Resident

Mr. Victor Mosley, Sr.
9902 West Main St., Apt. 1
Belleville, IL 62223
Section 8 Resident

Mr. James Bresina
203 N. Fritz, Apt. 308
Lebanon, IL 62254
Farmers Home Resident

Ms. Viola Raaf
550C N. 41st. Street
Belleville, IL 62226
Section 8 New Construction
Resident

Ms. Kathryn Dinwiddie
615 So. 2nd St., Lot #3
Belleville, IL 62220
Section 8 Resident

Ms. Mamie Johnson
601 Hinckley
Centreville, IL 62207
Public Housing Resident

Mr. Dave Wagner
Executive Director
St. Clair County Housing Authority
1790 South 74th Street
Belleville, IL 62223

*Member of St. Clair County Housing Authority Board of Commissioners

IL30d02

ST. CLAIR COUNTY HOUSING AUTHORITY

Conversion Analysis

Initial Assessment – Agency Plan Update 2008

Conversion Analysis Initial Assessment – Agency Plan Update 2008									
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	No	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

Note: Although Capital Improvement needs are extensive, all SCCHA public housing stock is viable. Therefore, no demolition or conversion is planned.

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 - 2008								
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	\$1,053,333	None Planned ³	None Planned ³	None Planned	None Planned	None Planned ³	DBA/CSA
#2 – Marissa	18	\$13,333	None Planned	None Planned	None Planned	None Planned	None Planned	DBA/CSA
#3 – Dupo	20	\$954,668	None Planned	None Planned	None Planned	None Planned	None Planned	DBA/CSA
#5 – Smithton	10	\$13,333	None Planned	None Planned	None Planned	None Planned	None Planned	DBA/CSA
#6 – Centreville	178	\$763,439	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	\$58,333	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	\$363,333	None Planned	None Planned	None Planned	None Planned	None Planned	DBA/CSA
#11 – Alorton	44	\$50,562	None Planned	None Planned	None Planned	None Planned	None Planned	DBA/CSA
#12 – Brooklyn	16	\$13,333	None Planned	None Planned	None Planned	None Planned	None Planned	DBA/CSA
#13 – New Athens	16	\$280,333	None Planned	None Planned	4-1br disabled only	None Planned	None Planned	DBA/CSA
#14 – Lebanon	24	\$13,333	None Planned	None Planned	4-1br disabled only	None Planned	None Planned	DBA/CSA
#16 & #61– Belleville	86	\$222,030	None Planned	None Planned	86 units elderly only	None Planned	None Planned	DBA/CSA
#17 – Washington Park	32	\$13,333	None Planned	None Planned	20-1br disabled only	None Planned	None Planned	DBA/CSA
#18 – Swansea	16	\$13,333	None Planned	None Planned	16 units elderly only	None Planned	None Planned	DBA/CSA
#19 – Lenzburg	8	\$13,333	None Planned	None Planned	4-1br disabled only	None Planned	None Planned	DBA/CSA
#20 – Centreville	8	\$13,333	None Planned	None Planned	None Planned	None Planned	None Planned	DBA/CSA
#21 – New Athens	16	\$420,333	None Planned	None Planned	16 units elderly only	None Planned	None Planned	DBA/CSA
#22 – Millstadt	18	\$357,439	None Planned	None Planned	None Planned	None Planned	None Planned	DBA/CSA
#24 – O’Fallon	20	\$13,333	None Planned	None Planned	None Planned	None Planned	None Planned	DBA/CSA
#27 – Belleville	64	\$116,562,	None Planned	None Planned	64 units elderly only	None Planned	None Planned	DBA/CSA
#28 – Lenzburg	8	\$68,333	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

**PUBLIC HEARING MINUTES
2008 AGENCY PLAN UPDATE
ST. CLAIR COUNTY HOUSING AUTHORITY
6:00 P.M., MONDAY, APRIL 7, 2008**

The St. Clair County Housing Authority (SCCHA) held a Public Hearing regarding its 2008 Agency Plan Update on April 7, 2008 at 6:00 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 23rd and 24th. Notice of the Public Hearing was also included in a mailing to all public housing and Section 8 households on or around February 28th.

These outreach efforts resulted in a total of three (3) persons recording their attendance at the April 7th Public Hearing. The attendees included one Section 8 participants and two public housing residents (both from Swansea). There were no community organization representatives. Refer to attached sign-in sheet.

Larry McLean, Deputy Director, presided over the hearing. Each person in attendance received a 2008 Agency Plan (AP) Template, Attachments to the AP, Supporting Documents to the AP, draft Revised Section 8 Administrative Plan, updated Public Housing Capital Fund 5 Year Plan, a Summary of Significant Changes in the Section 8 Administrative Plan (Admin Plan), and a Summary of Proposed Changes in the Public Housing Admissions and Continued Occupancy Policy (ACOP).

Mr. McLean provided a summary review of the purpose and intent of the Agency Plan and the development process. The Agency Plan Summary and Summary List of Attachments and Supporting Documents were reviewed (in highlight fashion). The proposed changes in the Section 8 Admin Plan and Public Housing ACOP were also highlighted.

Upon review of the Agency Plan Update components, Mr. McLean, responded to questions from those in attendance. Special mention was made regarding the revision of the Admin Plan and ACOP to include narrative defining eligible medical expenses as those allowable under Federal IRS Regulation 502. There were several questions regarding the impact of change on allowable medical expenses. Mr. McLean replied that the biggest change was the non-prescription (i.e. over the counter) medications would not eligible expenses. The residents from Swansea expressed their concern, citing specific vitamins and other non-prescription medications that they take. Mr. McLean explained that if SCCHA did not adopt the IRS guidelines, local policy would have to be developed to define what would and would not be eligible medical deductions. Because of staff, budget and other constraints, it was determined preferable to adopt the IRS guidelines.

The Swansea residents expressed the need for exterior siding repairs, patio divider wall repairs and parking lot improvements. Mr. McLean noted the comments and expressed

his intention to share them with the Modernization Department for consideration in the Capital Fund 5 Year Plan. *Note: As a result, the 5 Year Plan was modified to include budgeted amounts for exterior building improvements for 30-18 Swansea.*

A variety of miscellaneous other topics / issues not related directly to the Agency Plan material were discussed during the hearing. For example, the Section 8 Participant expressed a desire to move because her landlord closed the laundry room at the apartment complex in which she currently resides. There were questions from the public housing residents related to work orders, grass cutting, and snow / ice removal.

The Public Hearing formally closed at approximately 7:20 p.m., although Mr. McLean remained available to respond to individual concerns and questions raised by those in attendance.

Prepared by: _____ April 8, 2008
Larry McLean, Deputy 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.

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 is attached.

DECONCENTRATION INCENTIVES

The St. Clair County Housing Authority may offer one or more incentives to encourage applicant families whose income classification would help to meet the 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.

INCOME LIMIT / DECONCENTRATION WORKSHEET FOR 2008

Development Number / Name	Number of Units Under ACC	Number of Occupied Units	# of Units Occupied by Extremely Low-Income Families	% of Units Occupied by Extremely Low-Income Families	Census Tract	Percent of Very Poor in Census Tract
30-1	100	97	76	78.35%	5041.00	37%
30-9	42	41	34	82.93%		
30-12 Brooklyn	16	15	14	93.33%		
30-19	8	8	6	75.00%	5040.02	13%
30-28 Lenzberg	8	7	6	85.71%		
30-2	18	17	14	82.35%		
30-7 Marissa	14	14	9	64.29%		
30-3 Dupo	20	18	12	66.67%	5031.01	15%
30-5 Smithton	10	9	6	66.67%	5039.00	10%
30-6	91	77	72	93.51%	5027.00	29%
30-8	126	120	108	90.00%		
30-20 Centreville	8	7	5	71.43%		
30-10	110	106	91	85.85%	5028.00	29%
30-60	87	85	70	82.35%		
30-80 Centreville	16	16	15	93.75%		
30-11 Alorton	44	42	31	73.81%	5025.00	39%
30-13	16	15	13	86.67%	5040.01	11%
30-21 New Athens	16	15	5	* 33.33%		
30-14 Lebanon	24	21	15	71.43%	5043.02	16%
30-16	38	36	25	69.44%	5016.01	11%
30-27 Belleville	64	63	38	60.32%		
30-17 Washinton Park	32	28	25	89.29%	5022.00	36%
30-18 Swansea	16	15	5	* 33.33%	3033.01	7%
30-22 Millstadt	18	18	12	66.67%	5032.03	11%
30-24 O'fallon	20	17	10	58.82%	5043.05	6%
30-61 Belleville	48	48	29	60.42%	5019.00	11%

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

**ST. CLAIR COUNTY HOUSING AUTHORITY
INCOME CONCENTRATION ANALYSIS
AGENCY PLAN UPDATE 2008**

Development	Project	Average Income	Weighted Average	Adjusted Avg. Income	85% Threshold	115% Threshold	Within Range
PHA-WIDE		\$10,413	1.03	\$10,725	\$9,117	\$12,334	
Thomas Terry Apts.	001	\$10,752					
	009	\$8,717					
	Total	\$10,147	1.07	\$10,857			Y
Ernest Smith Sr.	006	\$7,350					
	008	\$7,879					
	Total	\$7,672	1.14	\$8,746			N
Private Mathison Manor	010	\$8,007					
	060	\$9,508					
	080	\$7,795					
	Total	\$8,607	1.09	\$9,382			Y

Weighted Average Adjustment For Bedroom Size Distribution

	Occupier Efficiency Units	Efficiency Units (.70)	1-bedroom Units (0.85)	2-bedroom Units (1.00)	3-bedroom Units (1.25)	4-bedroom Units (1.40)	5-bedroom Units (1.61)
PHA-WIDE	956	4	341	309	242	48	12
Thomas Terry Apts.	138	0	24	58	40	12	4
Ernest Smith Sr. Apts.	197	0	59	44	88	8	8
Private Mathison Manor	207	0	15	109	72	11	0
PHA-Wide	4x.70+341x.85+309x1+242x1.25+48x1.40+12x1.61						
	1.03						
Thomas Terry Apts.	0x.70+24x.85+58x1+40x1.11+12x1.40+4x1.61						
	1.07						
Ernest Smith Sr. Apts.	0x.70+59x.85+44x1+88x1.25+8x1.40+8x1.61						
	1.14						
Private Mathison Manor	0x.70+15x.85+109x1+72x1.25+11x1.40+0x1.61						
	1.09						

Resident Advisory Board Meeting
January 9, 2008
Minutes

The annual **meeting** of the Resident Advisory Board for the St. Clair County Housing Authority's Comprehensive Agency Plan was convened on January 9, 2008 at the Central Office, Belleville, IL.

The meeting was called to order by Larry McLean, SCCHA Deputy Director, in the absence the Chairman. Those members present are recorded on the attached sign-in sheet. Mr. McLean, welcomed those in attendance.

Mr. McLean reported that the 2007 Agency Plan Update had received HUD approval, distributing a copy of the approval notice.

A motion was made, seconded, and passed to approve the minutes of the February 21, 2007 meeting.

A motion was made, seconded, and passed to recruit additional members by preparing a direct mailing to Section 8 participants and federally subsidized properties not currently represented.

The Administrative Plan for the RAB was reviewed in detail. Minor changes were recommended as follows: paragraph 8 Staff Liaison will read: "The SCCHA shall designate annually a staff person to serve as the official liaison to the RAB." A motion was made, seconded and passed to approve the change. Mr. McLean agreed to arrange to have the document revised.

The following slate of officers were duly nominated and elected for the 2008 Agency Plan Update cycle:

Chairman, Earline Jenkins, Bel-Plaza II Apartments, Belleville
Vice-Chairman, Lucille Rains, Bel-Plaza I Apartments, Belleville
Secretary, Jessie Hooper, Section 8 Participant

Mr. McLean reported to the members that HUD had "suspended" the Resident Satisfaction Survey process for 2007 because of delays in selecting a contractor to administer the survey.

The utility allowance schedule for the Public Housing Program was reviewed and discussed.

The utility allowance schedule for the Section 8 HCVP Program was reviewed and discussed. Mr. McLean noted that SCCHA had contracted for the development and preparation of both the public housing and Section 8 utility allowance schedules with a company named the Nelrod Corporation.

Mr. McLean reported that the SCCHA board of commissioners had established the payment standard for the Section 8 HCVP at the 110% of the most recently published Fair Market Rents

with an effective date of January 1, 2008. The payment standard schedule was distributed to members.

The proposed meeting schedule for the 2008 update cycle was presented and reviewed. Mr. McLean noted that the draft agency plan needs to be complete by February 22nd to meet the 45 advance notice requirement for the public hearing to be held April 7, 2008.

The meeting was adjourned at approximately 12:00 noon.

Prepared by: _____ Date: January 15, 2008
Larry McLean, Management Director

Authorized by: _____ Date: _____
Jessie Hooper, Secretary

Resident Advisory Board
Regular Meeting
January 23, 2008
Minutes

The regular meeting of the Resident Advisory Board (RAB) for the St. Clair County Housing Authority's Comprehensive Agency Plan was convened on January 23, 2008 at the Central Office, Belleville, IL.

The meeting was called to order by Earline Jenkins, Chairman, with the members present recorded on the attached sign-in sheet. Larry McLean, Deputy Director, welcomed those in attendance.

A motion was made, seconded, and passed to approve the minutes of the January 9th meeting.

The draft recruitment letter proposed for mailing to Section 8 HCVP participants and non-represented public housing and other locations was reviewed and approved for distribution. Mr. McLean reported that the letter would be issued at the end of month and included in monthly statements for residents of SCCHA properties and under separate cover to Section 8 HCVP participants.

In the absence of Nancy Schmidt, Finance Director, who was unavailable due to illness, Mr. McLean gave a presentation to the members regarding Housing Authority financial matters. The members were provided with a copy of the Public Housing and Section 8 Housing Choice Voucher Program budgets for the fiscal year ending 6/30/08. Several observations were made: the impact "asset based management" is having on the budgetary process; the need for a Central Office Cost Center, Maintenance Cost Center and a total of ten different property groupings (i.e. AMPs); Public Housing Operating Fund consisting of 63% subsidy (2.68 million) and 37% tenant rent & other income (1.5 million); Capital Fund anticipated at \$1.59 million (including a \$100,000 contribution to the Operating Budget); Section 8 HCVP HAP & Administrative Fee budget of \$9.34 million. Mr. McLean concluded his presentation by responding to various questions asked by the members.

David Wright, Modernization Director, and Gayle Williamson, Modernization Manager, presented the members with various information regarding the modernization / capital improvement projects underway, to be bid in the near future, and included in the 5 Year Modernization Plan. Handouts included a Contract Status Report (dated December 2007) and the draft Five Year Plan For Modernization, CFP 2008 (dated 1/22/08). Mr. Wright noted that the "presumptive amount" is based upon the 2007 calendar year funding of \$1.587 million that is subject to change, noting the downward trend in funding in recent years. Mr. Wright explained that there is generally a delay of several months between the allocation of funds by HUD and start of contract work, noting that for the most part work funded in 2007 is expected to begin in the first part of 2008. The members were encouraged to comment on the plan and to encourage the residents that they represent to provide input regarding the physical needs of

the properties. Ms. McLean reported that the comment period will run through the public hearing scheduled for April. Several suggestions were made by the members for items to include in the plan, including:

- Removal of the large tree on the corner of Bates & South 44th St. in Centreville;
- Painting / repair of the metal fences in the rear of the units in the 30-6 property in Centreville;
- Installation of gutters or other rain water diversion mechanism for the North end of the Bel-Plaza 1 Building in Belleville;
- The need for additional parking spaces at the Bel-Plaza 1 building.

Mr. Wright thanked the members for their suggestions and indicated that all of the conditions noted would be considered for inclusion in the plan or otherwise addressed. The briefing concluded with Mr. Wright responding to various questions and making note of some other remarks.

Mr. McLean reported on the waiting lists for both the public housing program (consolidated) and the Section 8 HCVP. The members were reminded that a total of 18 separate public housing waiting lists are maintained. Mr. McLean noted that while the total numbers on the waiting list differ significantly --- 7,164 for Section 8 and 5,545 for public housing--- the demographics of the two lists were very similar. It was noted that 90%+ of applicants on the waiting lists for both program fell into the “extremely low” income category, defined by HUD as being 30% or below of the County median income. Sixty-three percent (63%) of households on both waiting lists were families with children and about 80% were African-American. All “Other” race / ethnicity groups combined comprise about 2% of the wait list. The largest wait list is the 2 bedroom list.

The Five Year Plan component of the Agency Plan Template was reviewed, including the mission statement and strategic goals. Mr. McLean noted that it remained a “goal” of SCCHA to establish a Section 8 HCVP homeownership program and a public housing homebuyer assistance program. However, staffing, and other resource constraints have prohibited progress in these areas to date.

The recent copies of the “Memo to Members” (the weekly newsletter of the National Low Income Housing Coalition) were distributed to the members.

The meeting was adjourned at approximately 12:00 noon.

Prepared by: _____ Date: January 31, 2008
Larry McLean, Deputy Director

Authorized by: _____ Date: _____
Jessie Hooper, Secretary

Resident Advisory Board
Regular Meeting
January 23, 2008
Minutes

The regular meeting of the Resident Advisory Board (RAB) for the St. Clair County Housing Authority's Comprehensive Agency Plan was convened on January 23, 2008 at the Central Office, Belleville, IL.

The meeting was called to order by Earline Jenkins, Chairman, with the members present recorded on the attached sign-in sheet. Larry McLean, Deputy Director, welcomed those in attendance.

A motion was made, seconded, and passed to approve the minutes of the January 9th meeting.

The draft recruitment letter proposed for mailing to Section 8 HCVP participants and non-represented public housing and other locations was reviewed and approved for distribution. Mr. McLean reported that the letter would be issued at the end of month and included in monthly statements for residents of SCCHA properties and under separate cover to Section 8 HCVP participants.

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the properties. Ms. McLean reported that the comment period will run through the public hearing scheduled for April. Several suggestions were made by the members for items to include in the plan, including:

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The recent copies of the “Memo to Members” (the weekly newsletter of the National Low Income Housing Coalition) were distributed to the members.

The meeting was adjourned at approximately 12:00 noon.

Prepared by: _____ Date: January 31, 2008
Larry McLean, Deputy Director

Authorized by: _____ Date: _____
Jessie Hooper, Secretary

Resident Advisory Board
Regular Meeting
February 6, 2008
Minutes

The regular meeting of the Resident Advisory Board (RAB) for the St. Clair County Housing Authority's Comprehensive Agency Plan was convened on February 6, 2008 at the Central Office, Belleville, IL.

The meeting was called to order by Lucille Rains, Vice-Chairman (in the absence of Earline Jenkins, Chairman), with the members present recorded on the attached sign-in sheet. Larry McLean, Deputy Director, welcomed those in attendance.

A motion was made, seconded, and passed to approve the minutes of the January 23rd meeting.

Mr. McLean reported on the response to the recruitment letter that was mailed to all Section 8 participants and residents of SCCHA-operated properties. Upon discussion, it was determined that all prospective members (except those from locations already represented) would be invited to attend the next meeting (scheduled for February 20th) as guests / observers. Those attending will be considered for membership.

The members were provided with an opportunity to ask follow-up questions to the topics discussed at the last meeting (Finance, Capital Fund, Waiting List, Five Year Plan).

The current income limits governing admissions to the Section 8 and Public Housing Program were distributed to and reviewed by the members.

The Annual Plan template was reviewed in its entirety, including the following components:

- Executive Summary
- Table of Contents
- Schedule of Attachments & Supporting Documents
- Housing Needs of Jurisdiction and Waiting List Demographics
- Strategies for Addressing Housing Needs
- Policies Governing Eligibility, Selection and Admissions
- Rent Determination Policies
- Operations and Management
- Capital Fund
- Hope VI (no activity)
- Demolition and Disposition (no activity)
- Designation of Public Housing
- Conversion of Public Housing to Tenant-Based Assistance (no activity)
- Homeownership Goals

- Community Service and Self-Sufficiency Programs
- PHA Safety and Crime Prevention Measures
- Pet Policy
- Fiscal Audit
- PHA Asset Management
- Resident Participation (RAB, Resident Commissioner, etc.)
- Consistency with Consolidated Plan

Mr. McLean responded to questions raised by the members regarding the various sections. The members expressed support of SCCCHA's intention to incorporate a waiting list preference for veteran's in its Section 8 Program.

Mr. McLean reported and the members expressed their support for SCCCHA's plan to apply to HUD for renewal of the public housing development designations for senior only and non-elderly disabled only as they currently exist.

The members expressed continued support for a Pet Policy that generally discourages pets in public housing, noting the various nuisances caused by pets, especially those in hi-rise buildings. It was suggested that tenants with pets be required to maintain liability insurance. Mr. McLean indicated that he would take the suggestion under advisement.

The recent copies of the "Memo to Members" (the weekly newsletter of the National Low Income Housing Coalition) were distributed to the members.

The meeting was adjourned at approximately 12:30 p.m.

Prepared by: _____ Date: January 31, 2008
 Larry McLean, Deputy Director

Authorized by: _____ Date: _____
 Jessie Hooper, Secretary

Resident Advisory Board
Regular Meeting
February 20, 2008
Minutes

The regular meeting of the Resident Advisory Board (RAB) for the St. Clair County Housing Authority's Comprehensive Agency Plan was convened on February 20, 2008 at the Central Office, Belleville, IL.

The meeting was called to order by Earline Jenkins, Chairman, with the members present recorded on the attached sign-in sheet. Larry McLean, Deputy Director, welcomed those in attendance.

A motion was made, seconded, and passed to approve the minutes of the February 6th meeting.

Mr. McLean reported that in accordance with the directions of the RAB, all residents / program participants who replied to the solicitation mailing were invited to attend today's meeting as visitors / observers. Ms. Jenkins thanked those in the audience for attending and expressing their interest in joining the RAB.

Mr. McLean gave an overview of the function and role of the RAB and its relationship to SCCCHA. Ms. Jenkins noted that the selection of new members would be limited to among those in attendance.

The members were provided with an opportunity to ask follow-up questions to the topics discussed at the last meeting (the draft Agency Plan template). Mr. McLean distributed copies of the final draft template to the members.

Mr. McLean provided the members with an "income limit" chart, noting that it included the "median income" amount for the area (this was in follow-up to a question asked at the last meeting).

The required attachments and supporting documents of the Annual Plan were reviewed and discussed, including the following:

- Public Housing Admissions and Continued Occupancy Policy (no revisions / changes planned at this time)
- Resident Advisory Board Membership Roster
- Conversion Analysis (no activity planned --- assessment concluded no need to convert any public housing units to tenant-based assistance)
- Public Housing Asset Management Table (including projected capital fund dollars to be allocated to each property over next five years; no development, demolition / disposition activity, designated properties as noted, no conversion or homeownership activities, and

- the implementation of development-based accounting and comprehensive stock assessment).
- Community Service Policy for Public Housing Program (no changes / revisions planned)
 - Deconcentration (income) Policy and Related Analysis (indicating that only “concentrated” development was the Ernest Smith Sr. Apts. in Centreville)
 - Site Based Waiting List Breakdown and Narrative (need to have site based waiting list re-affirmed by HUD during next fiscal year was noted)
 - Designation Narrative (review of properties designated for senior-citizens only, non-senior disabled only, mixed-occupancy and general occupancy; need to have designations re-affirmed by HUD during upcoming fiscal year was noted)
 - Section 8 Homeownership Capacity Statement and Policy (notation that program is basically inactive due to funding and staffing limitations)
 - Public Housing Pet Policy (no changes / revisions planned)
 - Management Needs Assessment and 5 Year Projections (priority is to maintain Senior Service and After-School Programs)
 - Public Housing Flat Rent Schedule (no changes / revisions planned)
 - Annual Plan Status Report (on goals for last year)
 - Five-Year Plan Status Report (on goals established for five year period from 2005-2009)
 - Section 8 Procedures for Informal Reviews and Informal Hearings (no changes / revisions planned)
 - Public Housing Grievance Policy (no changes / revisions planned)
 - Resident Survey Follow-up Plan (survey process suspended by HUD)
 - Section 8 Administrative Plan (complete re-write underway, with special meeting planned to review / consider)

Mr. McLean responded to questions raised by the members (and visitors) regarding the various attachments and supporting documentation.

The recent copies of the “Memo to Members” (the weekly newsletter of the National Low Income Housing Coalition) were distributed to the members. An article from the Chicago Tribune regarding the move toward Anti-Smoking Policies in rental market was reviewed and discussed by the members. Ms. Hooper noted that during her search for a new rental unit that she has encountered many owners / managers who either prohibit smoking in their units or charge a higher deposit for smokers. Ms. Jenkins and Ms. Rains both noted how a resident smoker in the high-rise buildings can impact other residents.

The next meeting was tentatively scheduled for March 19th, but will be subsequently confirmed. The meeting is needed to review the new Section 8 Administrative Plan.

Upon discussion and motion was made, seconded and passed to add the following new members:

Victor Mosley, Sr., representing the Section 8 HCVP, Belleville
Kay Riesch, representing public housing Amber Court, Belleville

Lashawnda Dotts, representing the Greystone Apartments, Alorton
James Bresina, representing Cedar Ridge, Lebanon
Kathryn Dinwiddie, representing the Section 8 HCVP, Belleville
Mamie Johnson, representing public housing @ Private Mathison Manor,
Centreville

Ms. Jenkins asked Mr. McLean to send a notice to the newly selected members and to those that had not been selected.

The meeting was adjourned at approximately 12:30 p.m.

Prepared by: _____ Date: February 21, 2008
Larry McLean, Deputy Director

Authorized by: _____ Date: _____
Jessie Hooper, Secretary

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Resident Advisory Board
Regular Meeting
April 2, 2008
Minutes

The regular meeting of the Resident Advisory Board (RAB) for the St. Clair County Housing Authority's Comprehensive Agency Plan was convened on April 2, 2008 at the Central Office, Belleville, IL.

The meeting was called to order by Lucille Rains, Vice-Chairman, with the members present recorded on the attached sign-in sheet. Larry McLean, Deputy Director, welcomed those in attendance, especially the new members representing the Section 8 HCVP Victor Mosley and Kathryn Dinwiddie.

A motion was made, seconded, and passed to approve the minutes of the February 20th meeting.

The members were provided with an opportunity to ask follow-up questions to the topics discussed at the last meeting (draft Agency Plan attachments and supporting documentation).

Mr. McLean provided the members with two additional Agency Plan attachments; compliance narratives related to the federal Violence Against Women Act (VAWA) and the Illinois Carbon Monoxide Detector Act.

The proposed revision of the Section 8 Administrative Plan was reviewed in highlight fashion. The Admin Plan includes the following Chapters:

- Chapter 1 - Overview of the Program and Plan
- Chapter 2 – Fair Housing & Equal Opportunity
- Chapter 3 – Eligibility
- Chapter 4 – Applications, Waiting List, and Tenant Selection
- Chapter 5 – Briefings and Voucher Issuance
- Chapter 6 – Income and Subsidy Determinations
- Chapter 7 – Verification
- Chapter 8 – HQS and Rent Reasonableness Determinations
- Chapter 9 – General Leasing Policies
- Chapter 10 – Moving with Continued Assistance
- Chapter 11 – Reexaminations
- Chapter 12 – Termination of Assistance and Tenancy
- Chapter 13 – Owners
- Chapter 14 – Program Integrity
- Chapter 15 – Special Housing Types
- Chapter 16 – Program Administration

- Chapter 17 – Project-Based Vouchers

Mr. McLean provided the members with a handout that highlighted significant changes in the plan (compared to the current plan). Several members asked questions regarding different aspects of the plan, with Mr. McLean responding to each issue raised.

Proposed changes in the Public Housing Admissions and Continued Occupancy Policy (ACOP), which were relatively minor, were reviewed.

A copy of the HUD notice reinstating the Resident Assessment and Satisfaction Survey was distributed to the members and briefly discussed. Mr. McLean encouraged the resident council officers to promote the survey and encourage residents receiving a survey form to reply.

Several publications were shared with the members, including:

- The recent copies of the “Memo to Members” (the weekly newsletter of the National Low Income Housing Coalition);
- HUD’s “Housing Needs of Persons with Disabilities Supplemental Findings to the Affordable Housing needs 2005 Report;”
- NAHRO Washington Update;
- National Low Income Housing Coalition’s Annual Report;
- HUD Press Release --- HUD Secretary Resigns

The next meeting was tentatively scheduled for June 25th, but will be subsequently confirmed. The intended purpose is to visit the Springfield Housing Authority to tour some of their recently developed public housing.

Mr. McLean responded to various questions / inquiries of the individual members.

The meeting was adjourned at approximately 12:30 p.m.

Prepared by: _____ Date: April 7, 2008
Larry McLean, Deputy Director

Authorized by: _____ Date: _____
Jessie Hooper, Secretary

CURRENT WAITING LIST FOR PUBLIC HOUSING

2/15/2008

LOCATION	1BR	2 BR	3BR	4BR	5BR	TOTALS
ADELINE J. BLDG.	22					22
ALORTON	912	751	307	9		1979
BEL PLAZA I	93					93
BEL-PLAZA II	101					101
AMBER COURT	144	7				151
BROOKLYN	465	317	26	37	7	852
ERNEST SMITH	993	850	211	59	6	2119
PRIVATE MATHISON	1036	895	271	56		2258
DUPO	74	717	332	56		1179
LEBANON	359	652	386	25		1422
LENZBURG	135	265	129		529	451
MARISSA	12	132	105	10		259
MILLSTADT	51	724	369			1144
NEW ATHENS	37	177				218
O'FALLON		1642				1642
SMITHTON	17		276	7		300
SWANSEA	146					146
WASHINGTON PARK	241	484				725
TOTALS	4838	7618	2412	259	13	15140

APU-2008 - IL30k02

St. Clair County Housing Authority's 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), plans to adopt a site-based waiting list in conjunction with the start of the new fiscal year, July 1, 2003.

Current practice is to maintain the waiting list on a county-wide 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 county-wide waiting list has resulted in gross inefficiencies.

Allowing interested households to submit an application on a site-specific basis is expected to improve service to applicants and increase 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. In addition, the appropriate changes have or will be made to the applicable provisions of SCCHA's Admissions and Continued Occupancy Policy (ACOP).

- 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., Lensburg
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 can not 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 reason 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.

**Designated Housing Plan For The
St. Clair County Housing Authority**

Effective Date: July 1, 2005

HUD Approved Date: May 20, 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 guideline, St. Clair County Housing Authority is demonstrating “capacity” to administer a Section 8 Homeownership Program by adopting the attached Section 8 Homeownership Policy.

IL30m02

HOMEOWNERSHIP

[24 CFR 982.625]

A. INTRODUCTION

The SCCHA provides the option of using Housing Choice Vouchers for participants to purchase a home. This addendum describes the eligibility requirements for the use of a voucher for homeownership and policies and procedures for the homeownership option.

B. GENERAL

The homeownership option is used to assist a family residing in a home purchased and owned by one or more members of the family. SCCHA must approve any live-in aide if needed as a reasonable accommodation so that the program is readily accessible to and usable by persons with disabilities.

SCCHA is making homeownership available to all who qualify. SCCHA will restrict homeownership to families or purposes defined by the SCCHA. The SCCHA will also limit the number of families assisted with homeownership to a maximum of 25 at any given time.

The SCCHA will offer the homeownership option to all applicant and participant families who meet the eligibility requirements listed below.

C. ELIGIBILITY REQUIREMENTS [24 CFR 982.627]

The family must meet all of the requirements listed below before the commencement of homeownership assistance.

- The family must be eligible for the Housing Choice Voucher Program.

The family must qualify as a first-time homeowner, or may be a co-operative or have a member who is a person with disabilities;

With the exception of elderly and disabled households, the family must meet the Federal minimum income requirement. The family must have a gross annual income equal to the Federal minimum wage multiplied by 2000 hours, based on the income of adult family members who will own the home. Unless the family is elderly or disabled, income from welfare will not be counted toward the requirement.

- At least one adult member who will own the home
Must be currently employed full time and must have been continuously employed for one year prior to the execution of Sales agreement.

HUD regulations define “full time employment” as not less than an average of 30 hours per week.

A family member will be considered to have been continuously employed even if that family member has experienced a break in employment, provided that break in employment has been the only break in employment within the past 12 calendar months.

The family must completed a initial lease term in the section 8 Housing Choice Voucher Program, a current resident of Public Housing who is has completed a initial lease term and is in good standing or an acceptable applicant from the waiting list (One that is eligible for the Choice Voucher Program);

Have fully repaid any outstanding debt owed to SCCHA or any other Housing Authority or former or current Section 8 Landlord;

Have not defaulted on a mortgage securing debt to purchase a home under the homeownership option;

Have not had any member who has present ownership interest in a residence at the commencement of homeownership assistance.

• **D. INITIAL REQUIREMENTS**

The SCCHA will impose the following additional Initial Requirements:

- The family has had no family-caused violations of HUD’s Housing Quality Standards within the last year.

The family has not committed any serious or repeated violations of SCCHA assisted leased within the past year.

E. HOMEOWNERSHIP COUNSELING REQUIREMENT [24 CFR 982.630]

When the family has been determined eligible, they must attend and complete homeowner counseling sessions. These counseling sessions will be conducted by a SCCHA approved Housing Counseling Agency. Such counseling shall be consistent with HUD-approved housing counseling.

The following topics will be included in the homeownership counseling sessions:

- Home maintenance (including care of the grounds).
- Budgeting and money management.
- Credit counseling
- How to negotiate the purchase price of a home.
- How to obtain homeownership financing and loan pre-approvals, including a description of types of financing that may be available, and the pros and cons of different types of financing.
- How to find a home, including information about homeownership opportunities, schools, and transportation in the SCCHA jurisdiction.
- Advantages of purchasing a home in an area that do not have a high concentration of low-income families and how to locate homes in such areas.
- Information about RESPA, state and Federal truth-in-lending laws, and how to identify and avoid loans with oppressive terms and conditions.
- Fair housing

F. ELIGIBLE UNITS [24CFR 982.628]

The unit must meet all of the following requirements:

- The unit must meet HUD’s “Eligible Housing” requirements. The unit may not be any of the following:
 - A Public Housing or Indian Housing unit;
 - A unit receiving Section 8 Project Based Assistance;
 - A nursing home, board and care home, or facility providing continual psychiatric, medical or nursing service;
 - A college or other school dormitory;
- The unit exists or is under construction at the time the family was determined eligible for homeownership assistance.
- The unit has been inspected by SCCHA and by and

Independent inspector designated by the family.

- The unit is a one-unit property or a single dwelling unit in a cooperative or condominium.
- The unit meets HUD Housing Quality Standards.

The SCCHA must not approve the seller of the unit if the SCCHA has been informed that the seller is debarred, suspended, or subject to a limited denial of participation.

G. SEARCH AND PURCHASE REQUIREMENTS [24 CFR 982.629]

The SCCHA has established the maximum time that will be allowed for a family to locate and purchase a home. The family's deadline date for locating a home to purchase will be 120 calendar days from the date the family's eligibility for the homeownership option is determined. For good cause, the SCCHA may extend a Section 8 family's time to locate the home for an additional (30) day increments for two increments. The family must purchase the home within the 3 months of SCCHA's approval of the Sales Agreement. The SCCHA will require periodic reports on the family's progress in finding and purchasing a home. The family will provide such reports at intervals of 30-days.

If a Section 8 family is unable to locate a home within the time approved by SCCHA, their Section 8 Rental Assistance in the Section 8 Housing Choice Voucher Program shall continue. The family may not reapply for the Section 8 Homeownership Program until they have completed an additional year of participation in the Section 8 Housing Choice Voucher Program.

H. INSPECTION AND CONTRACT [24 CFR 982.631]

The unit must meet Housing Quality Standards and comply with all governing municipal requirement. Independent professional inspector selected and paid for by the family. To assure the Home complies with the Housing Quality Standards of he Section 8 Program, Homeownership assistance payments may not commence until the SCCHA first inspects the home.

The Independent Inspection must cover the major building systems and components. The Inspector must be qualified to identify physical defects and report on property Conditions, including major building systems and components. These systems and components include, but are not limited to:

- Foundation and structure;
- Housing interior and exterior;
- Roofing

- Plumbing, electrical and heating systems.

The Independent inspector must not be a SCCHA employee or contractor. The SCCHA will not require the family to use an Independent Inspector selected by The SCCHA. However, SCCHA requires that Independent Inspectors be ASHI (American Society of Home Inspectors) certified. Copies of the Independent Inspection report will be provided to the family and SCCHA along with contract for Approval. Based on the information in this report, the family and the SCCHA will determine whether any pre-purchase repairs are necessary. The SCCHA may disapprove the unit for homeownership assistance because of the information in the report.

I. CONTRACT OF SALE

The family must enter into a Contract of Sale with the seller of the unit. A copy of the contract and the ASHI inspection must be given to the SCCHA. The contract of sale must specify the price and terms of sale, and provide that the purchaser will arrange for pre-purchase independent inspection of the home. The contract must also allow for inspection by SCCHA and the independent inspection referred to in Section H and must state that the purchaser is not obligated to purchase unless such inspections are satisfactory to SCCHA. The contract also must provide that the purchaser is not to pay for any necessary repairs without approval by SCCHA. The contract must provide that the purchaser is not obligated to purchase if the mortgage financing terms are not approved by SCCHA pursuant to Section J. The contract must also contain a seller certification that the seller is not debarred, suspended, or subject to a limited denial of participation under 24 CFR part 24.

J. FINANCING [24 CFR 982.632]

The family is responsible for securing financing SCCHA may disapprove proposed financing if the SCCHA determines that the debt is unaffordable. The proposed financing terms must be submitted to and approved by SCCHA prior to close of escrow. SCCHA shall determine the affordability of the family's proposed financing.

In making such determination, SCCHA may take into account other family expenses, including but not limited to child care, un-reimbursed medical expenses, education and training expenses and the like. Certain types of financing including but not limited to, balloon payment mortgages, unless convertible to variable rate mortgage are prohibited and will not be approved by SCCHA. Seller-financing mortgages shall be considered by SCCHA on a case-by-case basis. If a mortgage is not FHA-insured, SCCHA will require the lender to comply with the generally accepted mortgage underwriting standards consistent with those of HUD/FHA, Ginnie Mae, Fannie Mae, Freddie Mac, USDA Rural Housing Services, the Federal Home Loan Bank, or other private lending institutions.

- SCCHA requires that the financing for purchase provided is insured or guaranteed by the State of Federal Government (including FHA insurance), complies with secondary

mortgage market underwriting requirements, or complies with generally accepted private sector underwriting standards.

K CONTINUED ASSISTANCE [24 CFR 982.633]

Homeownership assistance may only be paid while the family is residing in the home. The family or lender is not required to refund homeownership assistance for the month when the family moves out.

The family must comply with the following:

- The family must comply with the terms of the Mortgage securing debt incurred to purchase the home or any refinancing of such debt.
- The family may not convey or transfer ownership Of the home, except for purposes of financing, refinancing or pending settlement of the estate of a deceased family member. Use and occupancy of the home are subject to CFR 982.551 (h) and (i).

The family must supply information to the SCCHA or HUD as specified in CFR 982.551 (b). The family must further supply any information required by the SCCHA or HUD concerning mortgage financing, sale or transfer of any interest in the home, or homeownership expenses.

The family must notify the SCCHA before moving out of the Home.

The family must notify the SCCHA if the family defaults on the Mortgage used to purchase the home.

No family member may have any ownership interest in any other residential property.

The family must attend and complete such ongoing Homeownership counseling as required by SCCHA

Before commencement of homeownership assistance, the family must execute a statement in which the family agrees to comply with all family obligations, under the homeowner option.

L. MAXIMUM TERM OF HOMEOWNERSHIP ASSISTANCE [24 CFR 982.634]

Except in the case of elderly or disabled families, the maximum term of homeownership assistance is:

- 15 years, if the initial mortgage term is 20 years or longer, or
- 10 years in all other cases.

The elderly exception only applies if the family qualifies as elderly at the start of homeownership assistance. The disabled exception applies if, at any time during the receipt of homeownership assistance, the family qualifies as disabled.

If the family ceases to qualify as elderly or disabled during the course of homeownership assistance the maximum term becomes applicable from the date assistance commenced. However, such a family must be afforded at least 6 months of homeownership assistance after the maximum term becomes applicable.

If the family receives homeownership assistance for different homes, or from different PHAs the total is subject to the maximum term limitations.

M. HOMEOWNERSHIP ASSISTANCE PAYMENTS AND EXPENSES [24 CFR 982.635]

The monthly homeownership assistance payment is the lower of: the voucher payment standard minus the total family contribution, of the monthly homeownership expenses minus the total family contribution.

In determining the amount of homeownership assistance payment, the SCCHA will use the same payment standard schedule, payment standard amounts, and subsidy standards as those described in this plan of the Housing Choice Voucher Program.

The SCCHA will pay homeownership assistance payments to a lender on behalf of the family.

Some homeownership expenses are allowances or standard determined by the SCCHA in accordance with HUD regulations. These allowances are used in determined expenses for all homeownership families and are not based on the condition of the home.

Homeownership expenses include:

- Principal and interest
- Mortgage insurance premium
- Taxes and insurance
- The SCCHA utility allowance used for the Voucher Program
- The SCCHA allowance for routine maintenance cost

- The SCCHA allowance for major repairs and replacements
- Principal and interest on debt for improvements
- If the home is cooperative or condominium, expenses also include operating expenses or maintenance fees assessed by the Homeowner Association.

N. PORTABILITY [24 CFR 982.636, 982.353 (b) and (c), 982.552, 982.553]

Subject to the restrictions on portability included in HUD Regulations and in Chapter 13 of this plan, the family may exercise portability if the receiving PHA is administering a Voucher Homeownership Program and accepting new homeownership families.

The receiving PHA may absorb the family into its Voucher Program, or bill the initial PHA. The receiving PHA arranges for housing Counseling and the receiving PHA's homeownership policy apply.

O. MOVING WITH CONTIUED ASSISTANCE [24 CFR 982.637]

A family receiving homeownership assistance may move with continued tenant-based assistance. The family may move with voucher rental assistance or with voucher homeownership assistance. Continued tenant-based assistance for a new unit cannot begin so long as any family member holds title to the prior home. The SCCHA prohibits more than one move by the family during any one-year period.

The SCCHA will deny permission to move with continued rental or homeownership assistance if SCCHA determines that it does not have sufficient funding to provide continued assistance. The SCCHA will require the family to complete additional homeownership counseling prior to moving to a new unit with continued assistance under the homeownership option.

P. DENIAL OR TERMINATION OF ASSISTANCE [24 CFR 982.638]

Termination of homeownership assistance is governed by the policies for the Housing Choice Voucher Program contained in Chapter IX Section L of the Administrative Plan. However, the provisions of the CFR 982.551 (c) through (j) are not applicable to homeownership.

The SCCHA will terminate homeownership assistance if the family is dispossessed from the home due to a judgment or order of foreclosure.

Q. DEFAULT ON FHA-INSURED MORTGAGE

If the family defaults on an FHA-Insured mortgage SCCHA may permit the family to move with continued Section 8 Housing Choice Rental Assistance if the family demonstrates that has (a) conveyed title to the home to HUD or its designee, as required by HUD; and (b) moved from the home within the period established or approved by HUD.

R. DEFAULT ON A NON FHA-INSURED MORTGAGE

If the family defaults on a mortgage that is not FHA-Insured, SCCHA may permit the family to move with continued Section 8 Housing Choice Voucher Rental Assistance if the family demonstrates that it has (a) conveyed title to the home to the lender, to SCCHA or to its designee, as may be permitted or required by the lender; and (b) moved from the home within the period established or approved by the lender and/or SCCHA.

The SCCHA will terminate homeownership assistance if the family violates any of the following family obligations:

- Transfer or conveyance of ownership of the home;
- Not providing requested information to SCCHA or HUD;
- Not notifying the SCCHA before moving out of the home;
- Failure to comply with the Family Obligations Under the Section 8 Program Policies;
- Family defaults on the mortgage;

T. RECAPTURE

If the family sells the home prior to the maximum 15-year subsidy limit, a percentage of the homeownership assistance provided to date must be recaptured. The terms of the sale agreement will be reviewed by the SCCHA to determine the amount of profit earned in relation to participant's payment and SCCHA Section 8 subsidy provided.

- Only those proceeds realized upon refinancing that are retained by the family are subject to recapture
- Sales proceeds that are used by the family to purchase a new home with Section 8 assistance are not subject to recapture. The family may also refinance the loan to take advantage of a lower interest rate without penalty.

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 its quarters in a manner that will prevent odors and unsanitary conditions.

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

All pets must be kept in the owner's unit, and must be controlled/contained when Housing Authority employees, its agents or others must enter the unit to conduct business. Pets must be leashed and attended 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.

CARBON MONOXIDE DETECTORS

The St. Clair County Housing Authority has conformed the policies and practices of both the Public Housing and Section 8 Programs to comply with the Illinois Carbon Monoxide Alarm Detector (CMAD) Act, which went into effect January 1, 2007.

ATTACHMENT FOR AGENCY PLAN
VIOLENCE AGAINST WOMEN'S ACT

In accordance with the Violence Against Women's Act, our agency will be working directly with the Violence Prevention Center located in Belleville, IL, (618) 235-0892. The Violence Prevention Center provides services for the following:

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