

Annual PHA Plan <i>(Standard PHAs and Troubled PHAs)</i>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 02/29/2016
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Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families.

Applicability. Form HUD-50075-ST is to be completed annually by **STANDARD PHAs or TROUBLED PHAs**. PHAs that meet the definition of a High Performer PHA, Small PHA, HCV-Only PHA or Qualified PHA do not need to submit this form.

Definitions.

- (1) **High-Performer PHA** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers, and was designated as a high performer on both of the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments if administering both programs, or PHAS if only administering public housing.
- (2) **Small PHA** - A PHA that is not designated as PHAS or SEMAP troubled, or at risk of being designated as troubled, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceeds 550.
- (3) **Housing Choice Voucher (HCV) Only PHA** - A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.
- (4) **Standard PHA** - A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceeds 550, and that was designated as a standard performer in the most recent PHAS or SEMAP assessments.
- (5) **Troubled PHA** - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
- (6) **Qualified PHA** - A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined, and is not PHAS or SEMAP troubled.

A. PHA Information.																															
A.1	<p>PHA Name: Housing Authority of the City of E. St. Louis PHA Code: IL001 PHA Type: <input checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA PHA Plan for Fiscal Year Beginning: (MM/YYYY): 04/2020 PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units 1687 Number of Housing Choice Vouchers (HCVs) 0 Total Combined Units/Vouchers 1687 PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission</p> <p>Availability of Information. PHAs must have the elements listed below in sections B and C readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.</p> <p>PHA Main Office Address: 700 N. 20th St. East St. Louis, IL 62205</p> <p><input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below)</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th rowspan="2">Participating PHAs</th> <th rowspan="2">PHA Code</th> <th rowspan="2">Program(s) in the Consortia</th> <th rowspan="2">Program(s) not in the Consortia</th> <th colspan="2">No. of Units in Each Program</th> </tr> <tr> <th>PH</th> <th>HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>					Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV	Lead PHA:																	
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B. Annual Plan Elements

B.1 Revision of PHA Plan Elements.

(a) Have the following PHA Plan elements been revised by the PHA?

- | | | |
|-------------------------------------|-------------------------------------|--|
| Y | N | |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Statement of Housing Needs and Strategy for Addressing Housing Needs |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Financial Resources. |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Rent Determination. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Operation and Management. |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Grievance Procedures. |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Homeownership Programs. |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Community Service and Self-Sufficiency Programs. |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Safety and Crime Prevention. |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Pet Policy. |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Asset Management. |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Substantial Deviation. |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Significant Amendment/Modification |

(b) If the PHA answered yes for any element, describe the revisions for each revised element(s):

(c) The PHA must submit its Deconcentration Policy for Field Office review.

Deconcentration of Poverty and Income-Mixing [24 CFR 903.1 and 903.2]

ESLHA must provide for deconcentration of poverty and income by mixing higher income residents with lower income residents. ESLHA will make concerted efforts to mix both high and low-income residents within certain developments. Developments subject to deconcentration are referred to as covered developments. Developments not subject to the deconcentration are designated specifically for elderly; operated with fewer than 100 public housing units; approved for demolition or for conversion to resident based public housing; approved mixed-finance developments using HOPE VI funds; or public housing funds.

ESLHA will determine the average income of all families in covered developments on an annual basis. Also, ESLHA must determine the established income range (EIR) for each of its covered developments which ranges from 85 percent to 115 percent of the average family income. If covered developments have an average income outside the EIR, ESLHA will then determine if the covered developments are consistent with its local and annual plan goals. If the development is not consistent with the local and annual plan goals, ESLHA may skip a family on the waiting list to select a family that furthers the goal of deconcentration.

Order of Selection [24 CFR 960.206(e)]

Applicants will be selected from the waiting list based on preference(s) and assigned point values. Each preference will receive points based on the point value assigned to that preference. If an applicant qualifies for more than one preference, the points are totaled to determine the applicant's ranking on the waiting list. Among applicants with equal preference status, the waiting list ranking is determined by application submission date/time to ESLHA. Applicants that do not qualify for any preferences will be placed on the waiting list based on application submission date/time to ESLHA.

Preferences Point Value(s)

ESLHA will assign point values to each applicant who qualifies for a preference to select the most appropriate applicant on the waiting lists. Points will be assigned as follows:

Point Value(s)	Preference(s)
20	Employed, Elderly or Disabled
5	Enrolled in or recently graduated from a job training or educational program
3	Applicants who live, work (current or newly hired) in East St. Louis.
5	Veteran

When selecting applicants from the waiting list, ESLHA will review the unit size, accessibility features, and unit type to the applicants on the waiting lists. ESLHA will offer the unit to the applicant that ranks highest in qualifying for the unit size or type or in accessibility features. An applicant with a lower ranking may receive an offer for housing prior to the prescribed order of selection for a variety of reasons including, but not limited to, to satisfy deconcentration targeting requirements.

Financial Resources

A Statement of Financial Resources is below:

ESLHA Financial Resources: Planned Sources and Uses Annual Plan 2020		
Sources	Amount Planned	Planned Activities
1. Federal Grants (FY2020 grants)		
Public Housing Operating Fund	\$10,583,004	
Public Housing Capital Fund	\$4,840,392	
Family Self Sufficiency (FSS)	\$68,985	
<i>Other Federal Grant (list below)</i>		
Special Needs Assistance Program (SNAP)	\$227,595	
Development	\$8,012,197	
2. Prior Year Federal Grants (unobligated fund only 09-30-18)		
		<i>Public Housing Capital Improvements, Development, RAD, and Demolition</i>
2019 Capital Funds – Emergency Grant	\$241,200	
2019 Capital Funds – Emergency Grant – Demo	\$483,624	
2019 Capital Funds – Lead Base Paint	\$941,132	
2017 Capital Funds	\$167,554	
2018 Capital Funds	\$414,803	
2019 Capital Funds	\$3,608,896	
2020 Capital Funds	\$5,036,154	
Subtotal	\$34,625,537	
3. Public Housing Dwelling Rental Income		
Tenant Income	\$2,351,012	<i>Public Housing Operations</i>
4. Other Income (list below)		

- Excess Utilities, tenant fees, non-dwelling rent, Landry, etc.	\$362,437	<i>Public Housing Operations</i>
- Interest on Investments		
Subtotal	\$2,713,449	
5. Non-Federal Sources (list below)		
	\$0	
Total Resources	\$37,338,986	

Section B.1 – Revision of PHA Plan Elements

Plan Element B.1 – Statement of Housing Needs and Strategy for Addressing Housing Needs

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	Affordability	Supply	Quality	Accessibility	Size	Location
Income <= 30% of AMI	3,760	5	5	4	4	2	5
Income >30% but <=50% of AMI	1,220	5	5	4	4	2	5
Income >50% but < 80% of AMI	710	5	5	4	4	2	5
Elderly (62+)	16.1%	5	5	4	4	2	5
Families with Disabilities	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Race/Ethnicity							
Hispanic	1.0%	5	5	4	4	2	2
Black or African American	96.2%	5	5	4	4	2	2
White	1.9%	5	5	4	4	2	2
Asian/ Pacific Islander	0.4%	5	5	4	4	2	2
Other	.9%	5	5	4	4	2	2

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
Indicate year:
- U.S. Census data: the Comprehensive Housing Affordability Strategy (“CHAS”) dataset American Housing Survey data
Indicate year: 2013-2017 5 Year Estimates
- Other housing market study
Indicate year:

Other sources: (list and indicate year of information). The Race/Ethnicity data is from the American Community Survey (ACS) 2018 5 Year Estimate

1. 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.

J qwlpj 'Pggf u'qHCo kgu'qp'vj g'RJ Ca'Y cklpi 'Nluu- Public Housing- East St. Louis (As of Sept.30 th 2020)			
Waiting list type: (select one)			
<ul style="list-style-type: none"> • Section 8 tenant-based assistance • Public Housing • Combined Section 8 and Public Housing • Public Housing Site-Based or Sub-jurisdiction Waiting List (optional). If used, identify which development/sub jurisdiction 			
	# of Families	% of Total Families	Annual Turnover
Waiting List Total	1105		N/A
Extremely low income <=30% AMI	911	82.44%	
Very low income (>30% but <=50% AMI)	129	11.67%	
Low Income (>50% but <80% AMI)	34	3.08%	
Families with children	381	34%	
Elderly families	93	8.42%	
Families with disabilities	213	19.28%	
Race/Ethnicity			
White	20	1.81%	
Black	1075	97.29%	
Hispanic	5	0.45%	
Asian	0	0.00%	
Native American	0	0.00%	
Native Hawaiian	1	0.09%	
Other	0	0.00%	
Declined/Not Listed	1	0.09%	
Characteristics by Bedroom Size			
0 BR	33	3%	
1 BR	691	63%	
2 BR	272	25%	
3 BR	95	9%	
4 BR	13	1%	
5 BR	1	<1%	

J qwlpj 'Pggf u'qHCo kgu'qp'vj g'RJ Ca'Y cklpi 'Nluu- Public Housing- East St. Louis (As of Sept. 30 2020)	
Is the waiting list closed (select one)?	
<ul style="list-style-type: none"> • Yes • No 	
If yes:	
How Long has it been closed (# of months) N/A	
Does the PHA expect to reopen the list in the PHA Plan Year? Yes • No N/A	
Does the PHA permit specific categories of families onto the waiting list, if generally closed?	
<ul style="list-style-type: none"> • Yes • No 	

2. 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 quality 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)

ESLHA will be renovating long-term vacate units within its portfolio.

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)

ESLHA will use current affordable housing resource to develop additional 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 percent 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
- 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 if applicable

- 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)

ESLHA affirmatively furthers fair housing through its application process, managing the waitlist, and tenant selection. Policies include not discriminating because of race, color, sex, religion, familial status, age, disability or national origin. ESLHA will:

- 1) ensure access to assisted housing regardless of race, color religion, nation origin, sex, familial status, and disability.
- 2) provide a suitable living environment for families living in assisted housing, regardless of race, color, religion, national origin, sex, familial status, and disability.
- 3) ensure accessible housing to persons with all varieties of disabilities regardless of unit size required.

(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)

ESLHA recently (2019 and 2020) demolished approximately 359 units in its public housing inventory and plans to demolish an additional 274 in 2021. The agency completed an Asset Redevelopment and Repositioning plan,

which was based on the housing needs of East St. Louis, in conjunction with the needs and financial limitations of ESLHA.

Utility Allowance

East St. Louis is updating the Utility Allowance for the various properties. Attached is a copy of the updated utility allowance for FY2021

Operation and Management

The Following Chapters of the ACOP contain changes. The changed sections of the ACOP at attached at the of Section B.1 for review.

- **Chapter 4 – Program Administration**
- **Chapter 6 – Resident Selection**
- **Chapter 10 – Denial of Admission**

Changes in Chapter 4 include changes to the Method of Collection of monies owed by residents, changes to the down payment percentages of Repayment Agreements, and the term of the agreements.

Changes in Chapter 6 include changes to the Eligibility Interview process to require selected applicants to participate in the interview conducted by telephone and/or video conference and submit all necessary information on or before the scheduled interview.

Changes in Chapter 10 include changes to the Required Denial of Admission, and Criminal Activity and Previous Behavior section of the Other Permitted Reason for Denial of Admission.

B.2 New Activities.

(a) Does the PHA intend to undertake any new activities related to the following in the PHA’s current Fiscal Year?

- | | |
|-------------------------------------|-------------------------------------|
| Y | N |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> |
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| <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> |

(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project based units and general locations, and describe how project basing would be consistent with the PHA Plan.

Mixed Finance Modernization or Development

ESLHA prepared an Asset Repositioning Plan identifying strategy for repairs, demolition, disposition and development to ensure the long-term viability of its assets. The Asset Repositioning Plan evaluated the utilization of various financing strategies including the potential for:

- Mixed-finance modernization at ESLHA’s viable properties
- Mixed-finance development on vacant property owned by ESLHA
- Mixed-finance development on property to be acquired by ESLHA

ESLHA is evaluating priorities with its development partner for the potential of participating in mixed-finance modernization and/or development across the portfolio. Current priorities include the Villa Griffin property and adjacent Mandela School, John Deshields, Phoenix Court and Phoenix Court Estates, John Robinson Homes, and development on property adjacent to the Jazz at Walter Circle.

Demolition and/or Disposition

See attached chart at the end of this Section B.2

Designated Housing for Elderly and/or Disabled Families

As a part of the development of ESLHA's Asset Repositioning Plan ESLHA will analyze data from City of E. St. Louis Consolidated Plan, Census data, ESLHA occupancy and waitlist and other relevant data to determine the need for Elderly and/or Disabled Families within ESLHA's portfolio. Based on the results of the analysis ESLHA will move forward with designating existing ESLHA properties and/or new development properties for Elderly and/or Disabled Families.

Conversion of Public Housing to Project-Based Assistance under RAD

ESLHA's Asset Repositioning Plan evaluated the potential benefits of converting ESLHA's entire portfolio or a portion of the portfolio to Project-Based Assistance with through Project Based Rental Assistance or Project Based Vouchers under the HUD Rental Assistance Demonstration (RAD) program. Several of the ESLHA sites present an attractive option for RAD conversion. ESLHA is currently working with its consultants to prioritize the sites for RAD conversion. Based on the analysis, ESLHA may submit a RAD application to convert all units or selected units to Project-Based Assistance. Current priorities include the Villa Griffin property, John Deshields, Phoenix Court and Phoenix Court Estates, and the possibility of transferring the assistance of Lansdowne Towers units to another RAD site.

Project-Based Vouchers

ESLHA is committed to providing quality affordable housing its residents and the residents of East St. Louis to that end and in accordance with PIH Notice 2018-04, the Housing Authority is evaluating the option of a Section 18 Disposition of its Scattered Site portfolio. In turn, the Housing Authority would Project Base the vouchers received as a result of the disposition and offer the current scattered site residents a unit as the replacement unit. Prior to the disposition ESLHA would make any needed repairs and/or renovations to ensure the units passes HQS inspections.

Since the ESLHA currently does not administer a Housing Choice Voucher Program, St. Clair County will administer the PBVs. ESLHA will work closely with the St. Clair County Housing Authority to minimize and disruptions to the residents.

Units with Approved Vacancies for Modernization

ESLHA is committed to minimizing its vacant units. Numerous units have been vacant for a prolonged period. ESLHA does not have adequate Operations monetary and staff resources to repair the existing vacant unit backlog. The use of Capital Fund, Low-Income Housing Tax Credits, private funding, and other public funding through a RAD conversion will enable ESLHA to increase its occupancy rate, thereby offering much needed increased affordable housing opportunity to the East St. Louis community, while improving the physical condition of the existing housing stock.

Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency, and Safety and Security Grants)

ESLHA was active in 2020 in its pursuit of other Capital Grant Programs made available by HUD. ESLHA expects to seek all Capital Grant funds made available by HUD in 2020 that can reasonably be anticipated to provide improvement to ESLHA's portfolio. Based on programs available in 2021, other Capital Grant Programs in 2021 may include use of Emergency funds for the demolition activities.

<p>B.3</p>	<p>Civil Rights Certification.</p> <p>Form HUD-50077, <i>PHA Certifications of Compliance with the PHA Plans and Related Regulations</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
<p>B.4</p>	<p>Most Recent Fiscal Year Audit.</p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p> <p>A financial audit was conducted by Clifton Larson Allen and a draft was issues 10/8/2019</p>
<p>B.5</p>	<p>Progress Report.</p> <p>Provide a description of the PHA’s progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.</p> <p>Mission Statement</p> <p>The mission of the Housing Authority of the City of East St. Louis is to provide quality and affordable housing through collaboration with residents and public and private entities to enhance the quality of life and foster economic self-sufficiency for our residents.</p> <p>In support of this Mission Statement, we recognize our residents as our ultimate customers and the foundation to enhance better neighborhoods within the City of East St. Louis.</p> <p>Program Objectives</p> <p>ESLHA will operate the Public Housing program using the following objectives as guidance:</p> <ul style="list-style-type: none"> • Provide decent, safe, and sanitary housing in compliance with program Uniform Physical Condition Standards for low-income families • Encourage self-sufficiency of participant families and assist in the expansion of family opportunities that address educational, socio-economic, recreational and other human service needs • Achieve a healthy mix of incomes in public housing developments by attracting and retaining higher income families and by working toward deconcentration of poverty goals • Promote fair housing and the opportunity for low-income families of all ethnic backgrounds • Promote a housing program that maintains quality service and integrity. Create positive public awareness and expand the level of family and community support in accomplishing ESLHA’s mission • Attain and maintain a high level of standards and professionalism in day-to-day management of all program components • Administer an efficient, high-performing agency through continuous improvement of ESLHA’s support systems • Ensure compliance with Title VI of the Civil Rights Act of 1964 and all other applicable Federal laws and regulations so that the admission and continued occupancy are conducted without regard to race, color, religion, creed, sex, national origin, disability, sexual orientation or familiar status. <p>Progress Report – 2020</p> <p><u>Promote Decent Affordable Housing</u></p>

Hope VI or Choice Neighborhoods

ESLHA submitted a Choice Neighborhoods Initiative Planning grant application to HUD on July 19, 2018. HUD notified ESLHA on September 5, 2018 that it was one of six awardees and received a CNI Planning grant for \$350,000. The primary ESLHA property in the neighborhood targeted in the grant application is the AMP 1 Samuel Gompers property. ESLHA will continue work on this Choice Neighborhoods initiative in conjunction with its development partner, the City of E. St. Louis, and project stakeholders.

When do we plan to submit an CNI application?

Public Housing initiatives:

1. Green Physical Needs Assessment (GPNA). ESLHA completed the most recent GPNA 2016. The GPNA continues to serve as a valuable tool to assist ESLHA in prioritizing its capital needs through 2020 and into 2021.
2. Master Repositioning Strategy. The repositioning strategy report, completed in March 2018 and updated in 2019, is intended as a road map and tool to assist ESLHA in further focusing its limited resources to achieve the most effective manner of meeting its goals and objectives related to maximizing the quantity and quality of its affordable housing stock. The repositioning strategy report reviewed public housing needs in the City of East St. Louis. This was a “Market” type analysis and considered the 2010 census data, waiting list data and lease termination data and other inputs in evaluation. The purpose was to establish an upper limit for the number and a type of public housing needs to provide necessary support for the low income and extremely low-income populations of the City of East St. Louis.
3. Rental Assistance Demonstration (RAD) Conversion: Developed a plan to determine the viability of converting public housing properties of the East St. Louis Authority to the HUD RAD concept. Conversion will allow the Housing Authority to seek private funding to address its each property’s capital needs. This goal is consistent with HUD Strategic Plan 2014-2018 Strategic Objective 2B Alignment. ESLHA submitted RAD applications and received CHAPs for Orr-Weathers family site, Roosevelt Homes, and Forest Village. As a requirement of the RAD process, ESLHA completed new Capital Needs Assessment at those properties. The initial conversion of Orr-Weathers will be implemented by the Housing Authority in the 1st Quarter 2021 and the conversion for Roosevelt Homes and Forest Village will occur in 4th Quarter of 2021.
4. Capital Improvements Department (CID). ESLHA continues its contract with a nationally respected consulting firm to provide assistance and capacity in the CID in order to carry out the goals and objectives related to the Modernization and Development activity and management of associated grants.

In 2020, Modernization projects have taken place, or are underway, at AMP 4 Villa Griffin, Phoenix Court, and Scattered Sites IL1-38 and IL1-39 developments; at AMP 3 Roosevelt Homes I and II, and Forest Village; at AMP 6 Lansdowne Towers, at AMP 7 Orr Weathers Low-Rise, and at AMP 8 Scattered Sites. A new on-call Architectural and Engineering design services contract was awarded to three qualified vendors to provide architectural, engineering and related technical consulting services to ESLHA.

2020 projects included:

- Began the demolition of 148 obsolete and structurally defective units at Norman Owens,
- Completion of three fire damage building at 1846-1850 North 43rd Street at Forest Village,
- Completion of new construction of 7 new units at the 4200 block of Forest Boulevard,
- Completion of the exterior repairs, water intrusion and beautification project at Roosevelt Homes,
- Completion of the installation of security screens at Roosevelt, Forest Village, Phoenix Estates and Phoenix Courts and AMP 4 Scattered Sites.

2020 architectural, engineering, and technical consulting projects included:

- A/E construction administration services for the Repair of the fire damaged building at 1846-1850 North 43rd Street at Forest Village.
- A/E design and construction administration services for the construction on new units at the 4200 block

of Forest Boulevard.

- A/E construction administration and technical consulting services for the demolition of the Brenton and Ruggeri Buildings at Lansdowne Towers.
- A/E design and construction services at Roosevelt Homes for the exterior repairs, water intrusion and beautification project,
- A/E design and construction service for the demolition of the Norman E. Owens site.
- A/E design service for the demolition of the remaining 2 towers at Lansdowne Towers
- A/E design service for the RAD conversion at Orr-Weather including interior and exterior renovations and new construction 16 units,
- A/E design service for the RAD conversion at Roosevelt Homes and Forest Village including interior and exterior renovations,
- A/E design service for Central Office Cost Center Restroom Alteration,
- A/E design service for wooden fence removal at AMP 1 and AMP 2,
- A/E design service for Villa Griffin site lighting repairs,
- A/E design service for 2 long term vacant Scattered Site units in AMP 4.

HUD Section 18 Demolition Applications for all units at Norman E. Owens was formally approved in 2020 and demolition began in 2020. Design work for has begun for the remaining units at AMP 6 Lansdowne Towers.

5. Development: McCormack Baron Salazar (MBS) continues to work with ESLHA to submit a Choice Neighborhoods Implementation Grant application to HUD in the FY2020 application. The Samuel Gompers property is the primary ESLHA property affected by the Choice Neighborhoods Initiative.

In conjunction with the recommendations of the Master Repositioning Strategy, the Housing Authority is moving forward with the RAD conversion, utilizing capital funds, and possibly other funding sources/strategies. The first Phase will include the RAD Conversion of Orr-Weathers Low-Rise, Forest Village, and Roosevelt. Additionally, ESLHA will include new construction at vacant land adjacent to Orr-Weathers Lo-Rise.

In 2020 ESLHA completed construction of 7 new public housing units primarily using Replacement Housing Factor (RHF) and PDEV funds at the 4200 block of Forest Boulevard. A/E design and construction is complete and on the seven new single-family and duplex units. The final development proposal was submitted to HUD in April 2019 and approved in May 2019 and the resident will begin occupying those units starting in the first week of November 2020.

ROSS and FSS

The Family Self- Sufficiency (FSS) and Resident opportunity and Self – Sufficiency (ROSS) programs are designed to help ESLHA residents become self-sufficient. The goals of our self-sufficiency programs are to reach each resident that choose to improve their quality of life.

There are many opportunities offering assistance to accomplish goals based on the needs to accommodate the head of household and family members. Self- Sufficiency and Service Coordinators offer programs and services from partners and agencies of the St. Louis Metropolitan Area. The services provided are based on expressed needs and interests of the entire family.

Coordinators meet with residents for Case Management in a private confidential setting. Group sessions are held and facilitated by agencies to speak with residents to build rapport and promote self-sufficiency. Group sessions are held on topics that offer an opportunity to improve resident’s lifestyles. The Social service and Counseling Agencies provide:

- Life skills - Household, Personal, and Parenting
- Health - Mental, Dental, and Vision
- Education - K-12 Diplomas, General Education Diploma, Certificates, College

- Employment - Temporary, Seasonal and Full Time to reduce dependence on welfare assistance
- Training - Construction Trades and Technical Schools
- Section 3 – Employment and Training opportunities for households earning less than 80% of the area median income
- Mental Health - Mental Health Therapy
- Substance Abuse - Alcohol, Legal Prescription, and Illegal Drug Use
- Financial Literacy - Money Smarts, Banking, Credit Building and Repair, IDA Accounts
- Homeownership - homeownership requirements, assist with down payments and closing costs
- Transportation - Personal, Public, Professional

Our forms of communication are not limited to flyers, newspaper, phone calls and bulk mailing. We encourage our residents to participate in our programs to remove barriers encountered by lack of knowledge, fear, anxiety, low self-esteem, and embarrassment.

Collaboration of these services are a key component to economic independence and success.

The Lighthouse Shelter plus Care Overview

The Lighthouse Shelter plus Care program (S+C) is a federally funded program authorized under subtitle F of the McKinney-Vento Homeless Assistance Act to serve a population that has been traditionally hard to reach.

S+C is designed to link rental assistance to provide permanent housing and supportive services on a long-term basis for hard-to-serve homeless persons with disabilities, (primarily those with serious mental illness, chronic problems with alcohol and/or drugs, and acquired immunodeficiency syndrome (AIDS), or related diseases) and their families who are living in places not intended for human habitation (e.g., streets) or in emergency shelters. The program allows for a variety of housing choices and a range of supportive services funded by other sources. The S+C program was built on the premise that housing and services need to be connected in order to ensure the stability of housing for this population.

Our budget currently supports roughly twenty-eight (28) participants/units. The goals of the S+C program are to assist homeless individuals and their families to increase their housing stability; increase their skills and/or income; and obtain greater self-sufficiency.

The East St. Louis Housing Authority Lighthouse Shelter Plus Care Program complies fully with all Federal, State, and Local nondiscrimination laws and with the rules and regulations governing Fair Housing and Equal Opportunity in housing.

Asset Management Improvements

The Division of Asset Management has made, or is in the process of making, the following improvements:

1. Closed the waiting list for one (1) bedroom units at the following developments:

- AMP 1: Samuel Gompers Homes, 450 N. 6th Street
- AMP 2: John Robinson/DeShields, 1235 McCasland Avenue
- AMP 3: Roosevelt Homes, 1328 44th Street
- AMP 4: Emmet Griffin Homes, 2630 Lincoln Avenue

2. Continually reduce the Tenant Account Receivable (TARS). Due to the Coronavirus (COVID-19), residential evictions are cancelled until further notice from either the Governor of the State of Illinois and/or the Centers for Disease Control and Prevention. In light of COVID-

	<p>19 restrictions, Management will continue to use various means to collect outstanding rental payments until evictions orders are enforceable. Provide an additional rent collection option to residents: online payments.</p> <p>3. Develop training schedules and modules for all relevant staff on best practices in preparing and completing the following: rent calculation, lease enforcement, addressing deficiencies based on prior REAC scores and servicing new equipment and materials.</p> <p>4. Develop and implement a Maintenance Plan.</p> <p>5. Develop target goals to reduce the vacancy rate.</p>
<p>B.6</p>	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) provide comments to the PHA Plan?</p> <p>Y N <input type="checkbox"/> <input type="checkbox"/></p> <p>(c) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p>
<p>B.7</p>	<p>Certification by State or Local Officials.</p> <p>Form HUD 50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p> <p>See attached</p>
<p>B.8</p>	<p>Troubled PHA.</p> <p>(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?</p> <p>Y N N/A <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>
<p>C.</p>	<p>Statement of Capital Improvements. Required for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).</p> <p>The ESLHA has completed a Green Physical Needs Assessment (GPNA) for the 10 AMPs. THE GPNA calculated immediate needs to be \$42,333,970.41 and total needs of \$221,952,659.48</p> <p>ESLHA has created a prioritization of wall including Development, Rehabilitation, RAD conversions, and Demolition of each AMP and Property.</p> <p>ESLHA will work to complete all improvements to improve the agency’s portfolio to ensure long-term physical, social, and financial viability of the PHA’s public housing development, including all the capital improvements to be undertaken.</p>
<p>C.1</p>	<p>Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan (HUD-50075.2) and the date that it was approved by HUD.</p> <p>5-Year Action Plan 2018-2022 approved by HUD in EPIC system on 10/24/2018.</p>

**Instructions for Preparation of Form HUD-50075-ST
Annual PHA Plan for Standard and Troubled PHAs**

CHAPTER 4-PROGRAM ADMINISTRATION

A. Methods of Collection

ESLHA will make every effort to collect money owed by residents. A variety of tools will be used to recover debts including, but not limited to:

- Demand for lump sum payment
- Repayment agreement
- Civil Suit
- **Garnishment of State and/or Federal Income Tax Refund**
- **Garnishment of Employment Income**
- File and report debt with collection agencies

B. Outstanding Debts

Any amount owed to ESLHA by a resident must be repaid. If the resident is unable to repay the debt within 30 days, ESLHA may offer to enter into a repayment agreement in accordance with the policies below. If the resident refuses to repay the debt, does not enter to a repayment agreement, or breaches a repayment agreement, ESLHA will terminate the tenancy in accordance with Chapter 22 and may pursue collection of debt by a method listed above.

C. Repayment Agreement

The term repayment agreement refers to a formal written document signed by the resident and provided to ESLHA in which the resident acknowledges a specific amount owed and agrees to repay the amount according to the agreement. There are some circumstances in which ESLHA may not enter into a repayment agreement which include but not limited to the following:

- Resident has an existing repayment agreement.
- If ESLHA determines that the resident committed program fraud.
- If ESLHA determines that the debt amount will not be repaid within **twenty-four (24)** months (considering household income and other factors).

D. General Repayment Agreement Terms and Guidelines for Residents

- **Down Payment Requirement**

ESLHA will require a down payment of **5%** of the total amount due before executing a repayment agreement with the resident. If the resident can provide evidence satisfactory to ESLHA that a hardship exists if a **5%** down payment is paid, ESLHA may, at its sole discretion, require a lesser percentage or waive the requirement.

- **Term of the Agreement**

The terms of the agreement shall not exceed **twenty-four (24)** months. The Executive Director or his/her designee may extend the duration of the repayment agreement in cases of extreme hardship.

- **Due Dates**

All payments are due on or before the close of the first business day of the month along with the rent.

- **Late or Missed Payments**

If resident fails to make the payment by the due date and prior approval by ESLHA of the missed payment, the resident will be provided a demand notice to make the outstanding payment within 14 days. If the payment is not received by the requested time, the agreement will be considered voided and ESLHA will proceed to terminate the tenancy.

Chapter 6 Resident Selection

Overview

As dwelling units become available, ESLHA will select applicants from the AMP's waiting list. The applicants are chosen based on waiting list ranking and selected preference(s) by the applicant.

6.1 Income Targeting [24 CFR 960.202(b)]

ESLHA is required to target available public housing units to extremely low-income families. Minimally, 40 percent of all new admissions with an annual income at or below 30 percent of the local area median income will be considered for public housing.

ESLHA may select a family that qualifies as extremely low income over other eligible families to satisfy the income targeting requirement. This offer of assistance will be made without discrimination based on race, color, religion, sex, national origin, age, disability or familial status.

6.2 Units Designated for Elderly Families [24 CFR 945]

Public housing developments operated by ESLHA that have been designated for elderly families only. If there are not enough elderly families to occupy the units in the designated development, near-elderly families will be allowed to occupy the units. Near-elderly family occurs when a head of household, spouse, life partner or co-head is at least 50 but not older than 62 years of age.

The elderly family's decision not to occupy and/or accept occupancy in designated housing will not have an adverse effect on their admission or continued occupancy in public housing or their position on or placement on any other site-based waiting list. However, this protection does not apply to any family who refuses to occupy or accept occupancy in designated housing because of the race, color, sex, age, gender, familial status, religion, disability, national origin, ancestry, sexual orientation, marital status, of the occupants of the designated housing or the surrounding area.

6.3 Deconcentration of Poverty and Income [24 CFR 903.1 and 903.2]

ESLHA must provide for deconcentration of poverty and income by mixing higher income residents with lower income residents. ESLHA will make concerted efforts to mix both high and low-income residents within certain developments. Developments subject to deconcentration are referred to as covered developments. Developments not subject to the deconcentration are designated specifically for elderly; operated with fewer than 100 public housing units; approved for demolition or for conversion to resident based public housing; approved mixed-finance developments using HOPE VI funds; or public housing funds.

ESLHA will determine the average income of all families in covered developments on an annual basis. Also, ESLHA must determine the established income range (EIR) for each of its covered developments which ranges from 85 percent to 115 percent of the average family income. If covered developments have an average income outside the EIR, ESLHA will then determine if the covered developments are consistent with its local and annual plan goals. If the development is not consistent with the local and annual plan goals, ESLHA may skip a family on the waiting list to select a family that furthers the goal of deconcentration.

6.4 Waiting List Preferences

ESLHA has established a preference system for admission to its public housing program. ESLHA uses the following local preference system:

- Employed, elderly or disabled
- Veteran
- Local Preference
- Enrolled in or recently graduated from a job training or educational program

An applicant qualifies for A preference if the family meets on or all of the requirements listed below. ESLHA will only apply preference points once to each family if the applicant family meets more than one definition under this preference.

1. Employed

An applicant qualifies for this preference if the head of household or spouse, or life partner of the applicant is employed. An applicant is considered employed if they work a minimum of 20 hours or greater per week.

2. Elderly

An applicant qualifies for this preference if the head of household, spouse or life partner of the applicant is 62 years old or older.

3. Disabled

An applicant qualifies for this preference if the head of household, spouse, life partner, or sole member is a person with disabilities; or two or more adult persons with disabilities living together; or one or more persons with disabilities living with one or more live-in aides. ESLHA applies the following definitions to terms related to a person who is disabled: a disability is defined in Section 233 of the Social Security Act (42 U.S.C. 423), a developmental disability is defined in Section 102(7) of the Developmental Disabilities Assistance and Bill of Rights Act (42U.S.C. 6001 (7)). The following conditions are not deemed a disability: diagnoses of alcoholism and/or drug abuse or HIV.

4. Veteran

An applicant qualifies for this preference if the head of household, spouse or life partner of the applicant is a person who served in the military and discharged or released honorably. Also, a survivor of veteran who actively served in the military. The term survivor includes the spouse or widow of a veteran.

5. Enrolled in or Recently Graduated from a Job Training or Educational Program

An applicant qualifies for this preference if the head of household or spouse, or life partner of the applicant is currently enrolled in or within the last 12-months graduated from a job training or educational program.

ESLHA defines a job training program as one with a curriculum that provides goals and objectives, generally having a variety of components, and taking place in a series of sessions over a period of time. It is designed to lead to a higher level of proficiency and it enhances the prospects for employment opportunities.

ESLHA defines an educational program as a GED program or an institution of higher learning. The applicant must be regularly attending an educational program and making progress toward attainment of a GED or enrolled in at least six credit hours at an institution of higher learning.

An applicant remains qualified for the preference if the applicant completed the job training program, obtained a GED or graduated from the institution of higher learning within the past 12 months.

6. Residency

An applicant qualifies for this preference if the head of household or spouse, or life partner of the applicant resides, works (currently or newly hired) in East St. Louis. New employment will require an offer letter from the employer to meet this preference.

6.5 Order of Selection [24 CFR 960.206(e)]

Applicants will be selected from the waiting list based on preference(s) and assigned point values. Each preference will receive points based on the point value assigned to that preference. If an applicant qualifies for more than one preference, the points are totaled to determine the applicant's ranking on the waiting list. Among applicants with equal preference status, the waiting list ranking is determined by application submission date/time to ESLHA. Applicants that do not qualify for any preferences will be placed on the waiting list based on application submission date/time to ESLHA.

Preferences Point Value(s)

ESLHA will assign point values to each applicant who qualifies for a preference to select the most appropriate applicant on the waiting lists. Points will be assigned as follows:

Point Value(s)	Preference(s)
20	Employed, Elderly or Disabled
5	Enrolled in or recently graduated from a job training or educational program
3	Applicants who live, work (current or newly hired) in East St. Louis.
5	Veteran

When selecting applicants from the waiting list, ESLHA will review the unit size, accessibility features, and unit type to the applicants on the waiting lists. ESLHA will offer the unit to the applicant that ranks highest in qualifying for the unit size or type or in accessibility features. An applicant with a lower ranking may receive an offer for housing prior to the prescribed order of selection for a variety of reasons including, but not limited to, to satisfy deconcentration targeting requirements.

6.6 Verification of Local Preference

An applicant's entitlement to a local preference will be accepted without verification at the initial application. When the family is selected from the waiting list for the final determination of eligibility, the preference will be verified. Applicants must verify this preference or it will be denied as a consideration. If this preference is denied, the applicant will be reconsidered for the waiting list based on submission of the application date/time to ESLHA. All preferences will be verified in accordance with the verification procedures outlined in Chapter 9.

6.7 Preference Denial

If ESLHA denies a preference, ESLHA will notify the applicant in writing with the reasons for denial and offer the applicant an opportunity for an informal review. If the denial is upheld as a result of the informal review, the applicant will be placed on the waiting list without benefit of the preference. Applicants may exercise other rights afforded to them if they believe they have been

discriminated against for any reason. If the applicant commits fraud in documentation or by verbal statements, the applicant will be completely removed from the waiting list.

6.8 Notification of Eligibility

ESLHA will notify the family by first class mail or e-mail when selected from the waiting list within five (5) days of scheduled appointment. The notice will provide the following information:

- Date, time, location of the interview and procedures to re-scheduling the interview
- Required Attendee(s)
- Required Documents, supportive documents to confirm preference(s) selected, guide for acceptable documentation

Applicants who fail to attend two (2) scheduled interviews, without the prior approval of ESLHA, will be denied assistance and removed from the waiting list. If a notification letter is returned from the Post Office, the applicant will have fifteen (15) days to notify ESLHA or the family will be removed from the waiting list without further notice.

6.9 Eligibility Interview

Selected applicants are required to participate in an eligibility interview. The head of household, spouse, life partner or co-head and any adult household member 18 and **over are required to attend and/or participate in the interview conducted by telephone and/or video conference. The required attendees must bring-in and/or submit by, fax and/or drop off all information necessary to establish the family eligibility and determine the appropriate level of assistance, and required completed forms and specified** documentation (provided in the notification letter).

ESLHA will provide translation services at ESLHA's expense upon request. Interviews are conducted in English for limited English proficient (LEP) applicants.

ESLHA will provide the family with a written list of outstanding items that must be submitted after the interview to finalize eligibility. If all required attendees are not present for the interview, ESLHA will request signed release forms from those members of the family. **Any required documents or information that the family is unable to provide the day of the interview must be provided within three (3) days following the interview.** If the family is unable to obtain the information or materials within the required time frame, the family may request an extension. If the outstanding items are not provided to ESLHA within either the required time or the extended time, the applicant will be denied eligibility in writing with the denial reasons provided.

Chapter 10 Denial of Admission

Overview

ESLHA will deny admission to an applicant who does not meet the eligibility criteria and they will be removed from all waiting list. In addition, ESLHA may deny admission based on certain types of current or past behaviors of family members. However, the Violence Against Women Act (VAWA) expressly prohibits the denial of admission to an otherwise qualified applicant on the basis that the applicant is or has been the victim of domestic violence, dating violence, sexual assault, or stalking.

10.1 Prohibited Reasons for Denial of Admission (24 CFR 5.105, 24 CFR 5.2005(b))

ESLHA shall not deny admission based on any of the following criteria:

- Age, disability, race, color, religion, sex or national origin (see Chapter 2 for additional information about fair housing and equal opportunity requirements);
- Family prior residence;
- Members of the family are unwed parents, recipients of public assistance or children born out of wedlock;
- Whether the family includes children;
- Whether a family decides to participate in a family self-sufficiency program;
- Qualified applicant is or has been a victim of domestic violence, dating violence or stalking if the applicant is otherwise qualified for assistance (see Chapter 4).

10.2 Required Denial of Admission (24 CFR 960.204)

ESLHA will deny assistance in the following cases:

Any member of the household has been evicted from federally assisted housing in the last **three (3) years for drug-related criminal activity**. ESLHA will admit an otherwise eligible family who was evicted from federally-assisted housing within the past three years for drug-related criminal activity if ESLHA is able to verify that the household member who engaged in the criminal activity has completed a supervised drug rehabilitation program approved by ESLHA, or the person who committed the crime is no longer living in the household.

ESLHA determines that any household member is currently engaged in the use of illegal drugs. Drug means a controlled substance as defined in section 102 of the Controlled Substances Act [21 U.S.C. 802]. Currently engaged in the illegal use of a drug means a person has engaged in the use of illegal drugs during the previous twelve (12) months.

ESLHA has reasonable cause to believe that any household member's current use or pattern of use of illegal drugs, or current abuse or pattern of abuse of alcohol, may threaten the health, safety or right to peaceful enjoyment of the premises by other residents.

In determining reasonable cause, ESLHA will consider all credible evidence, including but not limited to, any record of convictions, evictions of household members related to the use of illegal drugs or the abuse of alcohol. ESLHA will also consider evidence from treatment providers or community-based organizations providing services to household members.

Any household member has ever been convicted of drug-related criminal activity for the production or manufacture of methamphetamine on the premises of federally assisted housing.

Any household member is subject to a lifetime registration requirement under a state sex offender registration program.

Any household member has been evicted from federally assisted housing for any lease violation in the year immediately preceding the date of application.

10.3 Other Permitted Reasons for Denial of Admission

ESLHA may deny admission for the following reasons:

A. Criminal Activity (24 CFR 960.203(c))

If any household member is currently engaged in, or has engaged in any of the following criminal activities, within the past **five (5) years**, the family will be denied admission:

- Drug-related criminal activity, defined by HUD as the illegal manufacture, sale, distribution, or use of a drug, or the possession of a drug with intent to manufacture, sell, distribute or use the drug. (24 CFR 5.100)
- Violent criminal activity, defined as any criminal activity that has as one of its elements the use, attempted use, or threatened use of physical force substantial enough to cause, or be reasonably likely to cause, serious bodily injury or property damage. (24 CFR 5.100)
- Criminal activity that may threaten the health, safety, or welfare of other residents, ESLHA staff, contractors, subcontractors, or agents. (24 CFR 960.203(c)(3))
- Criminal sexual conduct, including but not limited to sexual assault, incest, open and gross lewdness, or child abuse

Evidence of such criminal activity includes, but is not limited, to any record of convictions within the past 5 years. ESLHA may on a case- by-case basis, decide not to deny admission based on the totality of the evidence reviewed.

B. Previous Behavior (960.203(c) and (d))

ESLHA may deny admission to an applicant family if ESLHA determines that the family:

- Has a pattern of unsuitable past performance in meeting financial obligations, including rent within the past three years.
 - Has a pattern of lease violations including but not limited to disturbance of neighbors, destruction of property, or living or housekeeping habits at prior residences within the past three years which may adversely affect the health, safety, or welfare of other residents.
 - Has a pattern of eviction from housing or termination from residential programs within the past **three (3)** years (considering relevant circumstances).
 - Owes rent or other amounts to ESLHA or any other PHA in connection with any assisted housing program.
 - Misrepresented or does not provide complete information related to eligibility, including income, award of preferences for admission, expenses, family composition or rent.
 - Has committed fraud, bribery, or any other corrupt or criminal act in connection with any federal housing program.
 - Has engaged in or threatened violent or abusive behavior toward ESLHA personnel. Abusive or violent behavior towards ESLHA staff, includes but not limited to, verbal as well as physical abuse or violence. Use of racial epithets, or other language, written or oral, that is customarily used to intimidate may be considered as abusive or violent

behavior. Threatening refers to oral or written threats or physical gestures that communicate intent to abuse or commit violence.

ESLHA will consider all factors outlined above. ESLHA may on a case-by-case basis, decide not to deny admission based on the totality of the evidence reviewed. ESLHA will consider the existence of mitigating factors, such as loss of employment or other financial difficulties, before denying admission to an applicant based on the failure to meet prior financial obligations.

A. PHA Information. All PHAs must complete this section.

A.1 Include the full **PHA Name, PHA Code, PHA Type, PHA Fiscal Year Beginning (MM/YYYY), PHA Inventory, Number of Public Housing Units and or Housing Choice Vouchers (HCVs), PHA Plan Submission Type,** and the **Availability of Information,** specific location(s) of all information relevant to the public hearing and proposed PHA Plan. ([24 CFR §903.23\(4\)\(e\)](#))

PHA Consortia: Check box if submitting a Joint PHA Plan and complete the table. ([24 CFR §943.128\(a\)](#))

B. Annual Plan. All PHAs must complete this section.

B.1 Revision of PHA Plan Elements. PHAs must:

Identify specifically which plan elements listed below that have been revised by the PHA. To specify which elements have been revised, mark the “yes” box. If an element has not been revised, mark “no.” ([24 CFR §903.7](#))

Statement of Housing Needs and Strategy for Addressing Housing Needs. Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA’s strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income), (ii) elderly families and families with disabilities, and (iii) households of various races and ethnic groups residing in the jurisdiction or on the waiting list based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. ([24 CFR §903.7\(a\)\(1\)](#)) Provide a description of the PHA’s strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year. ([24 CFR §903.7\(a\)\(2\)\(ii\)](#))

Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see [24 CFR 903.2](#). ([24 CFR §903.23\(b\)](#)) Describe the PHA’s admissions policy for deconcentration of poverty and income mixing of lower-income families in public housing. The Deconcentration Policy must describe the PHA’s policy for bringing higher income tenants into lower income developments and lower income tenants into higher income developments. The deconcentration requirements apply to general occupancy and family public housing developments. Refer to 24 CFR §903.2(b)(2) for developments not subject to deconcentration of poverty and income mixing requirements. ([24 CFR §903.7\(b\)](#)) Describe the PHA’s procedures for maintain waiting lists for admission to public housing and address any site-based waiting lists. ([24 CFR §903.7\(b\)](#)). A statement of the PHA’s policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV. ([24 CFR §903.7\(b\)](#)) Describe the unit assignment policies for public housing. ([24 CFR §903.7\(b\)](#))

Financial Resources. A statement of financial resources, including a listing by general categories, of the PHA’s anticipated resources, such as PHA operating, capital and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support public housing or tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program, and state the planned use for the resources. ([24 CFR §903.7\(c\)](#))

Rent Determination. A statement of the policies of the PHA governing rents charged for public housing and HCV dwelling units, including applicable public housing flat rents, minimum rents, voucher family rent contributions, and payment standard policies. ([24 CFR §903.7\(d\)](#))

Operation and Management. A statement of the rules, standards, and policies of the PHA governing maintenance and management of housing owned, assisted, or operated by the public housing agency (which shall include measures necessary for the prevention or eradication of pest infestation, including cockroaches), and management of the PHA and programs of the PHA. ([24 CFR §903.7\(e\)](#))

Grievance Procedures. A description of the grievance and informal hearing and review procedures that the PHA makes available to its residents and applicants. ([24 CFR §903.7\(f\)](#))

Homeownership Programs. A description of any Section 5h, Section 32, Section 8y, or HOPE I public housing or Housing Choice Voucher (HCV) homeownership programs (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval. ([24 CFR §903.7\(k\)](#))

Community Service and Self Sufficiency Programs. Describe how the PHA will comply with the requirements of community service and treatment of income changes resulting from welfare program requirements. ([24 CFR §903.7\(l\)](#)) A description of: **1)** Any programs relating to services and amenities provided or offered to assisted families; and **2)** Any policies or programs of the PHA for the enhancement of the economic and social self-sufficiency of assisted families, including programs under Section 3 and FSS. ([24 CFR §903.7\(l\)](#))

Safety and Crime Prevention. Describe the PHA’s plan for safety and crime prevention to ensure the safety of the public housing residents. The statement must provide development-by-development or jurisdiction wide-basis: (i) A description of the need for measures to ensure the safety of public housing residents; (ii) A description of any crime prevention activities conducted or to be conducted by the PHA; and (iii) A description of the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities. ([24 CFR §903.7\(m\)](#)) A description of: **1)** Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking; **2)** Any activities, services, or programs provided or offered by a PHA that helps child and adult victims of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and **3)** Any activities, services, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families. ([24 CFR §903.7\(m\)\(5\)](#))

Pet Policy. Describe the PHA’s policies and requirements pertaining to the ownership of pets in public housing. ([24 CFR §903.7\(n\)](#))

Asset Management. State how the agency will carry out its asset management functions with respect to the public housing inventory of the agency, including how the agency will plan for the long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs for such inventory. ([24 CFR §903.7\(q\)](#))

Substantial Deviation. PHA must provide its criteria for determining a “substantial deviation” to its 5-Year Plan. (24 CFR §903.7(r)(2)(i))

Significant Amendment/Modification. PHA must provide its criteria for determining a “Significant Amendment or Modification” to its 5-Year and Annual Plan. Should the PHA fail to define ‘significant amendment/modification’, HUD will consider the following to be ‘significant amendments or modifications’: a) changes to rent or admissions policies or organization of the waiting list; b) additions of non-emergency CFP work items (items not included in the current CFP Annual Statement or CFP 5-Year Action Plan) or change in use of replacement reserve funds under the Capital Fund; or c) any change with regard to demolition or disposition, designation, homeownership programs or conversion activities. See guidance on HUD’s website at: [Notice PIH 1999-51](#). (24 CFR §903.7(r)(2)(ii))

If any boxes are marked “yes”, describe the revision(s) to those element(s) in the space provided.

B.2 New Activities. If the PHA intends to undertake any new activities related to these elements in the current Fiscal Year, mark “yes” for those elements, and describe the activities to be undertaken in the space provided. If the PHA does not plan to undertake these activities, mark “no.”

Hope VI or Choice Neighborhoods. 1) A description of any housing (including project number (if known) and unit count) for which the PHA will apply for HOPE VI or Choice Neighborhoods; and 2) A timetable for the submission of applications or proposals. The application and approval process for Hope VI or Choice Neighborhoods is a separate process. See guidance on HUD’s website at: <http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm>. (Notice PIH 2010-30)

Mixed Finance Modernization or Development. 1) A description of any housing (including project number (if known) and unit count) for which the PHA will apply for Mixed Finance Modernization or Development; and 2) A timetable for the submission of applications or proposals. The application and approval process for Mixed Finance Modernization or Development is a separate process. See guidance on HUD’s website at: <http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm>. (Notice PIH 2010-30)

Demolition and/or Disposition. Describe any public housing projects owned by the PHA and subject to ACCs (including project number and unit numbers (or addresses)), and the number of affected units along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition; and (2) A timetable for the demolition or disposition. This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed as described in the PHA’s last Annual and/or 5-Year PHA Plan submission. The application and approval process for demolition and/or disposition is a separate process. See guidance on HUD’s website at: http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm. (24 CFR §903.7(h))

Designated Housing for Elderly and Disabled Families. Describe any public housing projects owned, assisted or operated by the PHA (or portions thereof), in the upcoming fiscal year, that the PHA has continually operated as, has designated, or will apply for designation for occupancy by elderly and/or disabled families only. Include the following information: 1) development name and number; 2) designation type; 3) application status; 4) date the designation was approved, submitted, or planned for submission, and; 5) the number of units affected. **Note:** The application and approval process for such designations is separate from the PHA Plan process, and PHA Plan approval does not constitute HUD approval of any designation. (24 CFR §903.7(i)(C))

Conversion of Public Housing. Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA is required to convert or plans to voluntarily convert to tenant-based assistance; 2) An analysis of the projects or buildings required to be converted; and 3) A statement of the amount of assistance received to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD’s website at: <http://www.hud.gov/offices/pih/centers/sac/conversion.cfm>. (24 CFR §903.7(j))

Conversion of Public Housing. Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA plans to voluntarily convert to project-based assistance under RAD. See additional guidance on HUD’s website at: [Notice PIH 2012-32](#)

Occupancy by Over-Income Families. A PHA that owns or operates fewer than two hundred fifty (250) public housing units, may lease a unit in a public housing development to an over-income family (a family whose annual income exceeds the limit for a low income family at the time of initial occupancy), if all the following conditions are satisfied: (1) There are no eligible low income families on the PHA waiting list or applying for public housing assistance when the unit is leased to an over-income family; (2) The PHA has publicized availability of the unit for rental to eligible low income families, including publishing public notice of such availability in a newspaper of general circulation in the jurisdiction at least thirty days before offering the unit to an over-income family; (3) The over-income family rents the unit on a month-to-month basis for a rent that is not less than the PHA’s cost to operate the unit; (4) The lease to the over-income family provides that the family agrees to vacate the unit when needed for rental to an eligible family; and (5) The PHA gives the over-income family at least thirty days notice to vacate the unit when the unit is needed for rental to an eligible family. The PHA may incorporate information on occupancy by over-income families into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD’s website at: [Notice PIH 2011-7](#). (24 CFR 960.503) (24 CFR 903.7(b))

Occupancy by Police Officers. The PHA may allow police officers who would not otherwise be eligible for occupancy in public housing, to reside in a public housing dwelling unit. The PHA must include the number and location of the units to be occupied by police officers, and the terms and conditions of their tenancies; and a statement that such occupancy is needed to increase security for public housing residents. A “police officer” means a person determined by the PHA to be, during the period of residence of that person in public housing, employed on a full-time basis as a duly licensed professional police officer by a Federal, State or local government or by any agency of these governments. An officer of an accredited police force of a housing agency may qualify. The PHA may incorporate information on occupancy by police officers into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD’s website at: [Notice PIH 2011-7](#). (24 CFR 960.505) (24 CFR 903.7(b))

Non-Smoking Policies. The PHA may implement non-smoking policies in its public housing program and incorporate this into its PHA Plan statement of operation and management and the rules and standards that will apply to its projects. See additional guidance on HUD’s website at: [Notice PIH 2009-21](#). (24 CFR §903.7(e))

Project-Based Vouchers. Describe any plans to use Housing Choice Vouchers (HCVs) for new project-based vouchers, which must comply with PBV goals, civil rights requirements, Housing Quality Standards (HQS) and deconcentration standards, as stated in 983.57(b)(1) and set forth in the PHA Plan

statement of deconcentration and other policies that govern eligibility, selection, and admissions. If using project-based vouchers, provide the projected number of project-based units and general locations, and describe how project-basing would be consistent with the PHA Plan. ([24 CFR §903.7\(b\)](#))

Units with Approved Vacancies for Modernization. The PHA must include a statement related to units with approved vacancies that are undergoing modernization in accordance with [24 CFR §990.145\(a\)\(1\)](#).

Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

For all activities that the PHA plans to undertake in the current Fiscal Year, provide a description of the activity in the space provided.

- B.3 Civil Rights Certification.** Form HUD-50077, *PHA Certifications of Compliance with the PHA Plans and Related Regulation*, must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the AFFH Certification if: it can document that it examines its programs and proposed programs to identify any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction. ([24 CFR §903.7\(o\)](#))
- B.4 Most Recent Fiscal Year Audit.** If the results of the most recent fiscal year audit for the PHA included any findings, mark "yes" and describe those findings in the space provided. ([24 CFR §903.7\(p\)](#))
- B.5 Progress Report.** For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year PHA Plan. ([24 CFR §903.7\(r\)\(1\)](#))
- B.6 Resident Advisory Board (RAB) comments.** If the RAB provided comments to the annual plan, mark "yes," submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA's decision made on these recommendations. ([24 CFR §903.13\(c\)](#), [24 CFR §903.19](#))
- B.7 Certification by State of Local Officials.** Form HUD-50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan. ([24 CFR §903.15](#)). Note: A PHA may request to change its fiscal year to better coordinate its planning with planning done under the Consolidated Plan process by State or local officials as applicable.
- B.8 Troubled PHA.** If the PHA is designated troubled, and has a current MOA, improvement plan, or recovery plan in place, mark "yes," and describe that plan. If the PHA is troubled, but does not have any of these items, mark "no." If the PHA is not troubled, mark "N/A." ([24 CFR §903.9](#))

C. Statement of Capital Improvements. PHAs that receive funding from the Capital Fund Program (CFP) must complete this section. ([24 CFR 903.7 \(g\)](#))

- C.1 Capital Improvements.** In order to comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan. PHAs can reference the form by including the following language in Section C. 8.0 of the PHA Plan Template: "See HUD Form- 50075.2 approved by HUD on 08/24/2017."

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the 5-Year and Annual PHA Plan.

Public reporting burden for this information collection is estimated to average 9.2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

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