OFFICE OF THE CAPITAL IMPROVEMENT DIVISION HOUSING AUTHORITY OF THE CITY OF EAST ST LOUIS IL

Public Housing Board of Commissioners

Resolution #03-23

Subject:

Action Required:

Submitted By:

Agency Annual Plan 2023,

Approve

Angela Russell-Perry Interim Executive Director

2023-2027 Five -Year Action Plan

HUD -50075-ST (12/2024) and 5-Year Plan

BACKGROUND: The HAESL is required to submit an Agency Annual 2023 Pan and a 2023-2027 Five-Year Plan to HUD. The Annual 2023 Plan and the 5-Year Plan are to be submitted electronically along with copies of certifications 75 days prior to the start of the new fiscal year for the HAESL, which begins on April 1, 2023. The date required for submission is no later than January 16, 2023. The Five-Year Plan is required to be uploaded into HUD's EPIC system.

A draft of the Agency Annual 2023 Plan, and the 2023 – 2027 Five-Year Plan was advertised in the East St Louis Monitor and in the Belleville News-Democrat and posted on HAESL's website. The public hearing concerning the Agency Annual Plan, Five-Year Plan, was held on January 6, 2023. No written input to the draft Plans was received from the community nor were there any attendees at the public hearing.

The final versions of the Agency Annual 2023 Plan, and 2023-2027 Five-Year Plan are finalized and have met the HUD public hearing requirements.

SYNOPSIS: Agency Annual 2023 Plan and 5-Year Plan submission to HUD not later than January 16, 2023, for Fiscal Year 2023. The Agency's Five-Year Action Plan must be uploaded in HUD's EPIC system.

FISCAL IMPACT: None

RECOMMENDATION: Approve

RESOLUTION NO. 03-23

Authorize and Approve

ANNUAL FY 2023 PLAN, and 2023-2027 FIVE-YEAR PLAN

- WHEREAS, the Housing Authority of the City of East St. Louis (HAESL) has completed its Agency Annual 2023 Plan, and the 2023 2027 Five-year Plan, in accordance with the Quality Housing and Work Responsibility Act (QHWRA) of 1998;
- WHEREAS, HAESL has complied with the QHWRA requirement requesting participation from local public and private entities, the public, local city government and residents from the public housing:
- WHEREAS, HAESL believes its Agency Annual 2023 Plan, and 2023 2027 Five-year Action Plan, are consistent with the County of St. Clair County Consolidated Plan:
- WHEREAS, HAESL will comply with all policies, procedures and requirements of its Agency Annual Plan in a timely, efficient and economical manner;
- WHEREAS, HAESL, has taken into consideration the comments and concerns of residents and other entities in preparing the Annual 2023 Plan, 2023 2027 Five-year Action Plan;
- WHEREAS, HAESL has made available all information relevant to the public hearing and requested public comments;
- WHEREAS, HAESL will carry out its Annual Plan, Five Year Action Plan, in conformity with Title VI of the Civil Rights Act of '1964, the Fair Housing Act, Section 504 of the Rehab. Act of 1993 and Title II of the Americans with Disabilities Act of 1990, and HAESL will comply with the Age Discrimination Act of 1975, the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped, Section 3 requirements and the Housing Act of 1968, and will comply with the Violence Against Women's Act (VAWA) 24 CFR 903.21;
- WHEREAS, HAESL has submitted with its Annual Plan a drug-free workplace certification required by 24 CFR Part 24, subpart 1;
- WHEREAS, HAESL will comply with Affirmative Action Requirements, Acquisition and Relocation Public Act 1970, Davis Bacon Determined Wage Rate Requirements under Section 12 and the Contract Workers Hours and Safety Standard Act, Lead Based Poisoning Prevention Act, National Environmental Policy Act;
- WHEREAS, HAESL will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine complaints with program requirements and policies, and

requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments) and 24 CFR Part 85 (Administrative Requirement for Grants and Cooperative Agreements);

WHEREAS, HAESL will undertake the activities and programs covered in its Annual Plan and will utilize covered grant funds for activities appropriate under the regulations;

WHEREAS, the Annual 2023 Plan, 2023 – 2027 Five Year Plan, and all attachments have been and will continue to be available at the HAESL Central Office, property management offices, and on the HAESL website at all times for public inspection.

NOW THEREFORE BE IT RESOLVED by the HAESL Board that the Annual 2023 Plan, 2023-2027 Five-year Action Plan, are hereby approved for submission. The Interim Executive Director is authorized to do all things necessary in support of the submission.

DeJuan Byrd, Board Chair for the Housing Authority of the City of East St Louis

ATTEST.

(Data)

Annual PHA Plan (Standard PHAs and Troubled PHAs)

U.S. Department of Housing and Urban Development Office of Public and Indian Housing OMB No. 2577-0226 Expires: 03/31/2024

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	 Number of Public Number of Hous PHA Plan Submission Type: Availability of Information. identify the specific location proposed PHA Plan are avail Management Project (AMF) their official website. PHAS PHA Main Office Address:	ginning: (MM/ nnual Contribute Housing (PH) ing Choice Vou Mannual Si PHAs must ha n(s) where the illable for inspect of the series of the ser	led PHA YYYYY): 04/2023 utions Contract (ACC) units at ti Units - 1667 uchers (HCV) - 0 ubmission	Annual Submission sections B and C readily ava Elements, and all information num, PHAs must post PHA Plands are strongly encourage t council a copy of their PHA	ilable to the public. A PHA must n relevant to the public hearing and ans, including updates, at each Asset ged to post complete PHA Plans on A Plans.
	Participating PHAs	PHA Code	Program(s) in the Consortia		No. of Units in Each Program

					Program(s) not in the Consortia	РН НС	v		
	Lead PHA:								
В.	Annual Plan	Elements							
Revision of PHA Plan Elements. (a) Have the following PHA Plan elements been revised by the PHA?									
(a) Have the following PHA Plan elements been revised by the PHA? Y N Statement of Housing Needs and Strategy for Addressing Housing Needs Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. Financial Resources. Rent Determination. Operation and Management. Financial Resources. Community Service and Self-Sufficiency Programs. Community Service and Self-Sufficiency Programs. Safety and Crime Prevention. Pet Policy. Substantial Deviation. 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] HAESL must provide for deconcentration of poverty and income by mixing higher income residents with lower income residents with certain developments. Developments subject to deconcentration are referred to as covered developments. Developments not subject to the deconcentration are designated for elderly; operated with fewer than 100 public housing units; approved for demolition or for conversion to resident based gapproved mixed-finance developments using HOPE VI funds; or public housing funds. HAESL will determine the average income families in covered developments on an annual basis. Also, HAESL must determine the established income range (EIR) for each covered developments which ranges from 85 percent to 115 percent of the average family income. If covered developments									
	Each preference will reference, the points us, the waiting list ran rill be placed on the v	are totaled to king is determined							
	HAESL will a	s Point Value(s) essign point valu be assigned as fo		licant who qualifies for a pref	erence to select the most a	ppropriate applicant	on the waiting lists,		
	FORTIS WILL		/HQ1431				_		
		Point Value(s)		Preference(s)	alad		_		
		5		Employed, Elderly or Disa	oled Iduated from a job training	or educational			
		~		program		o. oddoddonai			

3	Applicants who live, work (current or newly hired) in East St. Louis.	
5	Veteran	

When selecting applicants from the waiting list, HAESL will review the unit size, accessibility features, and unit type of the applicants on the waiting list. HAESL 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, satisfying deconcentration targeting requirements.

Financial Resources

A Statement of Financial Resources is below:

Sources	Amount Planned	Planned Activities
1. Federal Grants (FY2022 grants)		
Public Housing Operating Fund	\$9,273,677	
Public Housing Capital Fund	\$3,114699	
Resident Opportunity and Self-Sufficiency Grant	\$123,805	
Family Self Sufficiency (FSS)	\$17,380	
Other Federal Grant (list below)		
Special Needs Assistance Program (SNAP)	\$150,185	
Development	\$0	
RHF Funds	\$0	
2. Prior Year Federal Grants (unobligated fund only 9-30-22)		Public Housing Capital Improvements, Development, RAD and Demolition
2019 Capital Funds – Emergency Grant (Smoke/CD Detector)	\$62,108	
2019 Capital Funds – Lead Base Paint – IL01L001501-19	\$546,330	
2019 Capital Funds – IL01P001501-19	\$1,750,291	
2020 Capital Funds – IL01P001501-20	\$4,024,406	
2021 Capital Funds – IL01P001501-21	\$4,226,108	
2022 Capital Funds – IL01P001501-22	\$6,457,229	
Subtotal	\$17,066,473	
3. Public Housing Dwelling Rental Income		
Tenant Income	\$2,320,666	Public Housing Operations
4. Other Income (list below)		
- Excess Utilities, tenant fees, non-dwelling rent, Landry, etc.	\$88,026	Public Housing Operations
- Interest on Investments		
Subtotal	\$2,178,363	
5. Non-Federal Sources (list below)		
Total Resources	\$32,598,047	

Section B.1 - Revision of PHA Plan Elements

Extremely low income

<=30% AM1

761

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

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.

Family Type	Overall	Affordability	Supply	Quality	Accessibility	Size	Location
Income <= 30% of AMI	6,390	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	12.9%	5	5	4	5	2	2
Race/Ethnicity							
Hispanic	1.0%	5	5	4	4	2	2
Black or African							
American	96.3%	5	5	4	4	2	2
White	2.0%	5	5	4	4	2	2
Asian/ Pacific Islander	0.5%	5	5	4	4	2	2
Other	.2%	5	5	4	4	2	2

	PHA use to conduct this analys	sis? (Check all that apply; all mater	ials must be made available for public
inspection.)			
☐ Consolidated Plan of the Jurisdict	tion		
Indicate year:			
☑ U.S. Census data: the Compreher Indicate year: 2015-2019 5 Year Estin	-	itegy ("CHAS") dataset American F	Housing Survey data
☐ Other housing market study Indicate year:			
Traite year.			
Other sources: (list and indicate year Estimate	of information). The Race/Eth	nnicity data is from the American	Community Survey (ACS) 2018 5 Year
Housing Needs of Families on the Pu families on the PHA's waiting list/s. C separate tables for site-based or sub	Complete one table for each typ	pe of PHA-wide waiting list admini	ts State the housing needs of the istered by the PHA. PHAs may provide
II Ningdood familiae on	Ab a DIIA/a Maikina Liaka Dubli.	Marine Chr. of Fact Ch. Lavia	
(As of November 30 th 2022)	the PHA's Waiting Lists- Public	: Housing-City of East St. Louis	
Waiting list type: (select one)			
□Section 8 tenant-based assi	stance		
□Public Housing s			
□Combined Section 8 and Pu	blic Housing		
	-	(optional). If used, identify which	development/sub jurisdiction
Zar dono riodalità sice based e	# of Families	% of Total Families	Annual Turnover
Waiting List Total			

81.82%

Very low income (>30% but <=50% AMI)	129	13,87%	
Low Income (>50% but <80% AMI)	40	4.30%	
Families with children	176	59.46%	
Elderly families	70	7.52%	
Families with disabilities	107	11.50%	
Race/Ethnicity			
White	15	1.61%	
Black	879	94.51%	
Hispanic	7	0.75%	
Asian	0	0.00%	
Native American	0	0.00%	
Native Hawaiian	1	0.10%	
Other	0	0.00%	
Declined/Not Listed	21	2.25%	
Characteristics by Bedroom Size			
0 BR	48	5.16%	
1 BR	103	11.07%	
2 BR	441	47.42%	
3 BR	218	23.44%	
4 BR	87	9.35%	
5 BR	33	3.54%	

Housing Needs of Families on the PHA's Waiting Lists- Public Housing- East St. Louis (As of November 30, 2022)								
Is the waiting list closed (select one)? ☐ Yes								
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, even if generally closed? ☑ Yes ☐ No								

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

<u>Strategies</u>

Need: Provide quality affordable housing through renovation of current housing stock and developing new affordable housing units based on the needs of the community. **Build homes for ownership programs options to take our FSS families are in the escrow account program home ownership opportunities, increase philanthropic and private investment in affordable housing**

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
jurisdio	
	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
minori	ty and poverty concentration
	Maintain or increase section 8 lease-up rates by effectively screening Section 8 applicants to Increase owner acceptance of
progra	
⊠	Participate in the Consolidated Plan development process to ensure coordination with broader community strategies
\boxtimes	Other (list below)
	will be renovating long-term vacate units within its portfolio.
Strate	y 2. Increase the number of affordable housing units by:
Select	all that apply
	Apply for additional section 8 units should they become available
X	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.
X	Other: (list below)
	will use current affordable housing resource to develop additional housing units.
Need:	Specific Family Types: Families at or below 30% to 60% of median.
	y 1. Target available assistance to families at or below 30% to 60% 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
X	Employ admissions preferences aimed at families with economic hardships
X	Adopt rent policies to support and encourage work
	Other: (list below)
N1	C. 45. Family Tongs Fourth and a fallow 500/ of and the
	Specific Family Types: Families at or below 50% of median.
-	y 1. Target available assistance to families at or below 50% of AMI: all that apply
Select	Employ admissions preferences aimed at families who are working
	Adopt rent policies to support and encourage work
	Other: (list below)
	Other: (list below)
Need:	Specific Family Types: The Elderly
	yy 1. Target available assistance to the elderly:
	all that apply
\boxtimes	Seek designation of public housing for the elderly
\boxtimes	Apply for special-purpose vouchers targeted to the elderly, should they become available
	Other: (list below)
_	
Need:	Specific Family Types: Families with Disabilities.
Strate	gy 1. Target available assistance to Families with Disabilities:
Select	all that apply
\boxtimes	Seek designation of public housing for families with disabilities
\boxtimes	Carry out the modifications needed in public housing based on the section 504 Needs
Apply	for special-purpose vouchers targeted to familles with disabilitles, should they become available
	Affirmatively market to local non-profit agencies that assist families with disabilities
	Other: (list below)
	Specific Family Types: Races or ethnicities with disproportionate housing needs.
Strate	y 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)
Strato	ny 2. Conduct activities to affirmatively further fair housing:

	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)
- HAESL	affirmatively furthers fair housing through its application process, managing the waitlist, and tenant selection. Policies a not discriminating because of race, color, sex, religion, familial status, age, disability or national origin. HAESL will:
1) ensu	ure access to assisted housing regardless of race, color religion, nation origin, sex, familial status, and disability.
	vide a suitable living environment for familles living in assisted housing, regardless of olor, religion, national origin, sex, familial status, and disability.
3) ensi	ure accessible housing to persons with all varieties of disabilities regardless of unit size required.
Of the	factors listed below, select all that influenced the PHA's selection of the strategies it will pursue:
×	
X X	Funding constraints
\boxtimes	Funding constraints Staffing constraints
X X	Funding constraints Staffing constraints Limited availability of sites for assisted housing
	Funding constraints Staffing constraints Limited availability of sites for assisted housing Extent to which housing needs are met by other organizations in the community
	Funding constraints Staffing constraints Limited availability of sites for assisted housing Extent to which 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
	Funding constraints Staffing constraints Limited availability of sites for assisted housing Extent to which 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
	Funding constraints Staffing constraints Limited availability of sites for assisted housing Extent to which 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
	Funding constraints Staffing constraints Limited availability of sites for assisted housing Extent to which 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
	Funding constraints Staffing constraints Limited availability of sites for assisted housing Extent to which 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
	Funding constraints Staffing constraints Limited availability of sites for assisted housing Extent to which 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)
⊠ ⊠ ⊠ ⊠ ⊠ ⊠ ⊠ ⊠ ⊠ ⊠ ⊠ M Definit	Funding constraints Staffing constraints Limited availability of sites for assisted housing Extent to which 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

definition of a substantial deviation from the PHA Plan to exclude the following RAD-specific items:

- The decision to convert to either Project Based Rental Assistance or Project Based Voucher Assistance;
- Changes to the Capital Fund Budget produced as a result of each approved RAD Conversion, regardless of whether the proposed conversion will include use of additional Capital Funds;
- Changes to the construction and rehabilitation plan for each approved RAD conversion;
- Changes to the financing structure for each approved RAD conversion

Definition of Significant Amendment/Modification

The Housing Authority of the City of East Saint Louis's criteria for determining whether an amendment or modification to the Annual Plan or to the CFP 5-Year Action Plan is consistent with HUD's standard criteria. The criteria are as follows:

- Changes in rent, Admission & Continued Occupancy Policies (ACOP) and Addendums (Tenant Charge List, Dwelling Lease, Rules and Regulations) organization of the waiting list(s) in the Public Housing Program.
- Any proposed demolition, disposition, homeownership, Capital Fund Financing Program proposal, development, RAD conversion, or mixed-finance proposal not already included in the Annual Plan and 5-Year Action Plan is considered a Significant Amendment/Modification.
- AMP 12 Acquisition

	New Activities. (a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?
	(a) Dood the First that to another additional following in the First Surface Field
	N
	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.
	 Hope VI or Choice Neighborhoods HAESL/CESL will re-apply for the FY23 CNI Grant. The HAESL will work with consultants and development partners.
	Mixed Finance Modernization or Development HAESL prepared an Asset Repositioning Plan identifying strategy for repairs, demolition, disposition and development to ensure the long-
B.2	term viability of its assets. The Asset Repositioning Plan evaluated the utilization of various financing strategies including the potential for:
	Mixed-finance modernization at HAESL's viable properties
	 Mixed-finance development on vacant property owned by HAESL Mixed-finance development on the property to be acquired by HAESL
	HAESL will acquire the Jazz at Walter Circle senior housing and mix-used development in 2023, which has 66 public housing units and
	8 Section 8 project based vouchers (PBV) units using Capital Funds.
	New Construction at Orr Weather development adding 16 new units to the Orr-Weathers lo-rise site through HUD's Faircloth-to-RAD process.
	 The HAESL is working with an A/E firm to develop new construction at 79th Street – The Reserves.
	Demoiltion and/or Disposition See attached chart at the end of this Section B.2
	Sale of Lansdowne Towers – Rukavina/Starnes Demolish of fire units 851-853 Success Court
	Designated Housing for Elderly and/or Disabled Families As a part of the development of HAESL's Asset Repositioning Plan, HAESL will analyze data from the City of E. St. Louis Consolidated Plan, Census data, HAESL occupancy and waitlist and other relevant data to determine the need for Elderly and/or Disabled Families within HAESL's portfolio. Based on the results of the analysis, HAESL will move forward with designating existing HAESL properties and/or new development properties for Elderly and/or Disabled Families.
	Conversion of Public Housing to Project-Based Assistance under RAD HAESL is analyzing the possibility of converting a total of 72 units at AMP 7 Orr-Weathers Lo-Rise.
	Below is breakdown of the unit distribution for each property.

Development	1-Bedroom	2-Bedroom	3-Bedroom	4-Bedroom	5-Bedroom	Total
Orr-Weathers Family		19	51	2		72
Total		19	51	2		72

- HAESL does not anticipate any change in the number of units or in the bedroom distribution to the property, under the proposed conversion. However,
- HAESL has preliminarily elected to convert the Orr-Weather property to project based rental assistance (PBRAs) and does not
 anticipate any changes to the policies that govern eligibility, admission, selection, and occupancy of the units at the three converted
 properties.
- HAESL will finance the conversion of Orr-Weathers without Low-Income Housing Tax Credits equity. This will allow the Housing
 Authority to develop and retain management of the property. As a result, there will be no need to qualify residents for LITHC
 compliance or relocate residents that are over income. However, HAESL and the Orr-Weathers property will need to follow all RAD
 and PBRA requirements.
- Moreover, HAESL continues to review alternatives and the financial feasibility of converting additional units at other developments.

Project-Based Vouchers

• HAESL is committed to providing quality and safe affordable housing to 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 and New Construction portfolio. In turn, the Housing Authority would Project Base the vouchers received because of the disposition and offer the current scattered site residents a unit as the replacement unit. Prior to the disposition, HAESL would make any needed repairs and/or renovations to ensure the units pass HQS inspections. Capital Funding will be used to make the necessary repairs to the unit before applying for the Section 18 conversions to ensure the units pass HQS inspection. Once converted and after the units pass the HQS inspection, the Housing Authority will secure private funding for necessary upgrades to modernize the units. Since the HAESL does not currently administer a Housing Choice Voucher Program, St. Clair County will administer the PBVs. HAESL will work closely with the St. Clair County Housing Authority to minimize any disruptions to the residents.

Units with Approved Vacancies for Modernization

HAESL is committed to minimizing its vacant units. Numerous units have been vacant for a prolonged period. HAESL does not have
adequate Operations funding or staff resources to repair the existing vacant unit backlog. The use of Capital Funds, Low-Income
Housing Tax Credits, private funding, and other public funding through a RAD conversion will enable HAESL to increase its occupancy
rate. This will offer much needed, affordable housing opportunities 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)

• HAESL expects to seek all Capital Grant funds made available by HUD in 2023 that can potentially improve HAESL's portfolio.

Progress Report.

Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.

Mission Statement

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. 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.

Program Objectives:

B.3

HAESL will operate the Public Housing program using the following objectives as guidance:

- 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 HAESL'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 HAESL'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 familial status.

Progress Report - 2022

Promote Decent, Safe, and Affordable Housing

- Housing Authority of the City of East St Louis (HAESL) in partnership with the City of East St Louis (CESL) submitted an application per
 the NOFO FY21 Choice Neighborhoods Implementation Grant Program (FR-6500-N-34) application on February 15, 2022. On May
 24, 2022, the HAESL was notified they were selected as one of five grant finalists. The HAESL CNI Team completed the virtual site visit
 on June 21, 2022. On September 15, 2022, HAESL/CESL was notified the application FY21 CNI grant was not selected.
- HAESL submitted an application per the NOFO Capital Fund at Risk/Receivership/Substandard/Trouble Program (FR-6500-N-81) on July 11, 2022.
- The HAESL submitted an application per the NOFO FY 22 Job Plus Initiative (FR-6600-N-14). HAESL was selected as one of four finalists. A virtual site visit was completed on December 7, 2022.

Public Housing Initiatives:

In 2023, Modernization projects have taken place, or are underway, at AMP 1 Samuel Gompers, AMP 2 John DeShields; AMP 3 Roosevelt Homes I and II, and Forest Village; AMP 4 Villa Griffin, Phoenix Court, and Scattered Sites IL1-38 and IL1-39 developments; 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 HAESL.

2023 Projects Included:

- Remove carpets to replace them with vinyl tile at Jazz at Walter Circle.
- Completion of installation of code-compliant Carbon Monoxide and Smoke Detectors at several properties agency-wide.
- Completion of lead hazard removal activities at AMP 1, 2, and 3.
- Pre-development phase of a new development/community at 79th Street and Church Lane in East Saint Louis. The new development, when complete will house 70 new affordable units and a community center within the next 6 years.
- Modernization of AMP 3 housing developments, Forest Village (59 units) and Roosevelt Homes I,II,III (208 units). The
 modernization/rehab consists of interior updates.
- Complete Phase I, II, and III of Modernization of 9 single-family homes located in AMP 8-Scatterred Sites.
- Demolition of fire units located at 851 and 853 Success Court.
- Sale of Lansdowne Tower (Rukanvia and Starnes) to a Not-For-Profit Women's Veteran Center
- Pre-Development of Orr Weathers Rehab/New Development
- Pave street/sidewalks at John D. Shields and John Robinson
- Install new roof at Helen Community Center (AMP 7)

2023 architectural, engineering, (A/E) and technical consulting projects included:

- A/E design service for the RAD conversion at Orr-Weathers including interior and exterior renovations and new construction of 16 units,
- A/E design service for the Roosevelt Homes and Forest Village including interior and exterior renovations,
- A/E design of 79th Street new development
- A/E design of sidewalk/street repairs at HA AMPs
- Developed a scanning and retrieval system for construction documents.
- In conjunction with the recommendations of the Master Repositioning Strategy, the Housing Authority is moving forward with the RAD conversion, 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, HAESL will include new construction on vacant land adjacent to Orr-Weathers Lo-Rise.

ROSS and FSS

The Family Self- Sufficiency (FSS) and Resident opportunity and Self – Sufficiency (ROSS) programs are designed to help HAESL residents become self-sufficient. The goals of our self-sufficiency programs are to reach each resident that chooses to improve their quality of life. There are many opportunities to accomplish goals based on the needs of the head of household and family members. Self- Sufficiency and Service Coordinators offer programs and services from partners and agencies in 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 facilitated by agency representatives to build rapport and promote self-sufficiency with residents. Group sessions are held on topics that offer an opportunity to improve residents' lifestyle. 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 The various forms of outreach and engagement include flyers, newspaper, phone calls and bulk mailing. The residents are encouraged to participate in 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.
B.4	Capital Improvement. Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved. 5-Year Action Plan 2021-2025 approved by HUD in EPIC system on 03/30/2021.
B.5	Most Recent Fiscal Year Audit. Were there any findings in the most recent FY Audit? Y N If yes, please describe: A financial audit was conducted by Clifton Larson Allen for the year ending March 31, 2022. A draft was submitted. As a result, Clifton Larson Allen noted for following deficiencies: Financial Reporting Internal Control Deficiency Failure to properly reconcile general ledger accounts to subsidiary records and post all transactions and entries prior to the audit
C.	Other Document and/or Certification Requirements
C.1	Resident Advisory Board (RAB) Comments. (a) Did the RAB(s) provide comments to the PHA Plan? Y N S 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.
C.2	Certification by State or 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.
C.3	Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. Form HUD-50077-ST-HCV-HP, PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed, must be submitted by the PHA as an electronic attachment to the PHA Plan.

C.4	Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public. Did the public challenge any elements of the Plan? Y N If yes, include Challenged Elements.							
C.5	Troubled PHA. (a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place? Y N N/A I I I I I I I I I I I I I I I I I I I							
D.	Affirmatively Furthering Fair Housing (AFFH)							
D.1	Affirmatively Furthering Fair Housing (AFFH). Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item. Fair Housing Goal: Prevention of Non-Discrimination Describe fair housing strategies and actions to achieve the goal HAESL will ensure all residents are informed of all applicable laws regarding discrimination and all available reporting options if an applicant or resident believes public housing discrimination is occurring. During the admissions process of all residents, HAESL will provide specific information pertaining to public housing discrimination. Fair Housing Goal: Reasonable Accommodations Describe fair housing strategies and actions to achieve the goal HAESL will ensure that persons with a disability have complete access to programs and services by making reasonable accommodation in rules, policies, practices, and/or services when such accommodation may be necessary to afford a person with a disability the equal opportunity to use and enjoy a program or unit under the program.							

		Fair Housing Goal: Development of an Analysis of Impediments	
		Describe fair housing strategies and actions to achieve the goal	
		HAESL will procure services to develop an analysis of impediments and develop an action and implementation plan.	
Inct	ructio	ons for Preparation of Form HUD-50075-ST	
		HA Plan for Standard and Troubled PHAs	
Α.	PHA	Information. All PHAs must complete this section. (24 CFR §903.4)	
	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))	
В.	Plar	Elements. All PHAs must complete this section.	
	B.1	Revision of Existing 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 need of families who reside in the jurisdiction served by the PHA and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. 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 (iii) households with individuals with disabilities, and households of various races and ethnic groups residing in the jurisdiction or on the public housing and Section 8 tenant-based assistance waiting lists based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The statement of housing needs shall be based on information provided by the applicable Consolidated Plan, information provided by HUD, and generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. Once the PHA has submitted an Assessment of Fair Housing (AFH), which includes an assessment of disproportionate housing needs in accordance with 24 CFR §5.154(d)(2)(iv), information on households with individuals with disabilities and households of various races and ethnic groups residing in the jurisdiction or on the waiting lists no longer needs to be included in the Statement of Housing Needs and Strategy for Addressing Housing Needs. (24 CFR §903.7(a)).	
		The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. (24 CFR $\S903.7(a)(2)(i)$) Provide a description of the ways in which the PHA intends, to the maximum extent practicable, to address those housing needs in the upcoming year and the PHA's reasons for choosing its strategy. (24 CFR $\S903.7(a)(2)(ii)$)	
		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	

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 (24 CFR §903.7(I)). Provide 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 subject to Section 3 of the Housing and Urban Development Act of 1968 (24 CFR Part 135) and FSS. (24 CFR §903.7(I))
Safety and Crime Prevention (VAWA). 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. For modifications resulting from the Rental Assistance Demonstration (RAD) program, refer to the 'Sample PHA Plan Amendment' found in Notice PIH-2012-32 REV-3, successor RAD Implementation Notices, or other RAD Notices.
If any boxes are marked "yes", describe the revision(s) to those element(s) in the space provided.
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 §903.23(b))
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."

B.2

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: https://www.hud.gov/program offices/public indian housing/programs/ph/hope6 . (Notice PIH 2011-47)
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: https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6/mfph#4
Demolition and/or Disposition. With respect to public housing only, describe any public housing development(s), or portion of a public housing development 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 approval under section 18 of the 1937 Act (42 U.S.C. 1437p); 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. Approval of the PHA Plan does not constitute approval of these activities. 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, 5) the number of units affected and; 6) expiration date of the designation of any HUD approved plan. 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 under the Voluntary or Mandatory Conversion programs. 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 under the Rental Assistance Demonstration (RAD) program. 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 Rental Assistance or Project-Based Vouchers under RAD. See additional guidance on HUD's website at: Notice PIH 2012-32 REV-3, successor RAD Implementation Notices, and other RAD notices.
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 and Notice PIH-2017-03. (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.
Progress Report. For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA's

- **B.3 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.4 Capital Improvements. PHAs that receive funding from the Capital Fund Program (CFP) must complete this section (24 CFR §903.7 (g)). To comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan in EPIC and the date that it was approved. PHAs can reference the form by including the following language in the Capital Improvement section of the appropriate Annual or Streamlined PHA Plan Template: "See Capital Fund 5 Year Action Plan in EPIC approved by HUD on XX/XX/XXXX."
- **B.5 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))
- C. Other Document and/or Certification Requirements.
 - C.1 Resident Advisory Board (RAB) comments. If the RAB had comments on 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)
 - C.2 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.
 - C.3 Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-50077 ST-HCV-HP, PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed. Form HUD-50077-ST-HCV-HP, PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed 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 certification requirement to affirmatively further fair housing if the PHA fulfills the requirements of §§ 903.7(o)(1) and 903.15(d) and: (i) examines its programs or proposed programs; (ii) identifies any fair housing issues and contributing factors within those programs, in accordance with 24 CFR 5.154 or 24 CFR 5.160(a)(3) as applicable; (iii) specifies actions and strategies designed to address contributing factors, related fair housing issues, and goals in the applicable Assessment of Fair Housing consistent with 24 CFR 5.154 in a reasonable manner in view of the resources available; (iv) works with jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; (v) operates programs in a manner consistent with any applicable consolidated plan under 24 CFR part 91, and with any order or agreement, to comply with the authorities specified in paragraph (o)(1) of this section; (vi) complies with any contribution or consultation requirement with respect to any applicable AFH, in accordance with 24 CFR 5.150 through 5.180; (vii) maintains records reflecting these analyses, actions, and the results of these actions; and (viii) takes steps acceptable to HUD to remedy known fair housing or civil rights violations, 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)).

- C.4 Challenged Elements. If any element of the Annual PHA Plan or 5-Year PHA Plan is challenged, a PHA must include such information as an attachment to the Annual PHA Plan or 5-Year PHA Plan with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.
- C.5 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. Include dates in the description and most recent revisions of these documents as attachments. 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)

D. Affirmatively Furthering Fair Housing (AFFH).

D.1 Affirmatively Furthering Fair Housing. The PHA will use the answer blocks in item D.1 to provide a statement of its strategies and actions to implement each fair housing goal outlined in its accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5) that states, in relevant part: "To implement goals and priorities in an AFH, strategies and actions shall be included in program participants' ... PHA Plans (including any plans incorporated therein) Strategies and actions must affirmatively further fair housing" Use the chart provided to specify each fair housing goal from the PHA's AFH for which the PHA is the responsible program participant – whether the AFH was prepared solely by the PHA, jointly with one or more other PHAs, or in collaboration with a state or local jurisdiction – and specify the fair housing strategies and actions to be implemented by the PHA during the period covered by this PHA Plan. If there are more than three fair housing goals, add answer blocks as necessary.

Until such time as the PHA is required to submit an AFH, the PHA will not have to complete section D., nevertheless, the PHA will address its obligation to affirmatively further fair housing in part by fulfilling the requirements at 24 CFR 903.7(o)(3) enacted prior to August 17, 2015, which means that it examines its own programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintain records reflecting these analyses and actions. Furthermore, under Section 5A(d)(15) of the U.S. Housing Act of 1937, as amended, a PHA must submit a civil rights certification with its Annual PHA Plan, which is described at 24 CFR 903.7(o)(1) except for qualified PHAs who submit the Form HUD-50077-CR as a standalone document.

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

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

HAESL Proposed 2023 - 2027 5-yr Plan

Project	AMP	BLI	Total CFP 23-27	CFP 23	CFP 24	CFP 25	CFP 26	CFP 27
Project	AIVIE	DLI	10tal CFP 23-27	\$5,570,225	\$4,653,451	\$5,564,842	\$5,564,842	\$4,720,355
		-		\$3,370,223	\$4,033,431	33,304,042	73,304,642	74,720,333
Sum of Physical Improvements (Dwelling								
Structure and Site)		1480		\$0	\$0	\$0	\$0	\$0
465 70700 AS (2700-471-470)				20000				
Management Improvements (10%)		1408		\$0	\$0	\$0	\$0	\$0
PHA-Wide Non-dwelling Structures and					** ***	44.000	44 000	44.000
Equipment		1480		\$0	\$1,000	\$1,000	\$1,000	\$1,000
Administration (10%) Operations (10%)		1410 1406		\$557,023 \$557,023	\$557,023 \$557,023	\$465,345 \$465,345	\$556,484 \$556,484	\$556,484 \$556,484
Demolition and Relocation		1480		\$337,023	\$0	\$0	\$0	\$0
Demontor and Relocation		1400		70			70	70
Total CFP Funds				\$1,114,045	\$1,115,045	\$931,690	\$1,113,968	\$1,113,968
							, , , , , , , , , , , , , , , , , , , ,	. ,
A & E Fees - Fees and Costs	1	1480	\$86,301	\$40,000		\$0	\$46,300	\$1
A & E Fees - Fees and Costs	2	1480	\$235,000	\$10,000	\$20,000	\$5,000	\$100,000	\$100,000
A & E Fees - Fees and Costs	3	1480	\$350,000	\$50,000	\$100,000	\$50,000	\$50,000	\$100,000
A & E Fees - Fees and Costs	4	1480	\$255,000	\$10,000	\$20,000	\$75,000	\$50,000	\$100,000
A & E Fees - Fees and Costs (RAD demolition)	5	1480	\$0		\$0	\$0	\$0	\$0
A & E Fees - Fees and Costs (demolition)	6	1480	\$0	\$0	\$0	\$0	\$0	\$0
A & E Fees - Fees and Costs	7	1480	\$0		\$0	\$0	\$0	\$0
A & E Fees - Fees and Costs (comp rehab)	8	1480	\$50,000		\$0	\$0	\$0	\$0
A & E Fees - Fees and Costs A & E Fees - Fees and Costs	9	1480 1480	\$40,000		\$10,000 \$5,000	\$10,000 \$5,000	\$10,000 \$5,000	\$10,000 \$5,000
A & E Fees - Fees and Costs A & E Fees - Fees and Costs	11	1480	\$10,000		\$5,000	\$5,000	\$5,000	\$3,000
A & E Fees - Fees and Costs A & E Fees - Fees and Costs	13	1480	\$10,000		\$3,000	\$0	\$0	\$0
Jet-VAC	1	1480	\$64,000		\$12,800	\$12,800	\$12,800	\$12,800
Jet-VAC	2	1480	\$64,000		\$12,800	\$12,800	\$12,800	\$12,800
Jet-VAC	3	1480	\$0		\$0	\$0	\$0	\$0
Jet-VAC	4	1480	\$98,800	\$10,000	\$22,200	\$22,200	\$22,200	\$22,200
Jet-VAC	5	1480	\$25,000	\$5,000	\$5,000	\$5,000	\$5,000	\$5,000
Jet-VAC	6	1480	\$0		\$0	\$0	\$0	\$0
Jet-VAC	7	1480	\$0	\$0	\$0	\$0	\$0	\$0
Samuel Gompers								
			\$25,000	\$5,000	\$5,000	\$5,000	\$5,000	\$5,000
Bug-Rodent Extermination - Gompers	1	1480	¢750.000	¢150,000	¢150,000	¢150,000	¢150,000	¢150,000
Repair Leak from the Roof Tree Trimming	1	1480 1480	\$750,000 \$25,000		\$150,000 \$5,000	\$150,000 \$5,000	\$150,000 \$5,000	\$150,000 \$5,000
Tree Hillining		1460			\$3,000	80000 -0000		
Security Camera replacements	1	1480	\$90,000	\$10,000	\$20,000	\$20,000	\$20,000	\$20,000
Selective Interior, Exterior, and Site						DARKS S	2000	
repair (CNI)	1	1480	\$0	\$0	\$0	\$0	\$0	\$0
Appliance Replacement	1	1480	\$110,000	\$0	\$20,000	\$20,000	\$20,000	\$50,000
Demolition/Relocation	1	1480D	\$1,150,000			\$50,000	\$50,000	\$50,000
John Robinson / John Deshields								
Bug-Rodent Extermination - John			\$75,000	\$15,000	\$15,000	\$15,000	\$15,000	\$15,000
DeShields and Robinson	2	1480	\$75,000	313,000	\$15,000	\$13,000	\$13,000	\$13,000
Selective Interior, Exterior, and Site		257,459,659	\$2,255,010	\$5,010	\$750,000	\$500,000	\$500,000	\$500,000
repair - (CNI/RAD)	2	1480	4000.000	4.0	4400000	4400.000	40	40
RAD Pre-Development	2	1480	\$200,000	\$0	\$100,000	\$100,000	\$0	\$0
Security Camera replacements	2	1480	\$90,000	\$10,000	\$20,000	\$20,000	\$20,000	\$20,000
Transformer replacement/wiring	2	1480	\$50,000	\$50,000	\$0	\$0	\$0	\$0
Play Ground	2	1480	\$40,000		\$0	\$0	\$0	\$0
Tree Trimming	2	1480	\$25,000		\$5,000	\$5,000	\$5,000	\$5,000
Replacment/Installation of plumbing dr	2	1480	\$250,000		\$0	\$0	\$0	\$0
Unit Renovation	2	1480	\$10,000			\$0	\$0	\$0
Pole Barn	2	1480	\$25,000			\$0	\$0	\$0
			\$861,000	\$0	\$0	\$861,000	\$0	\$0
Demolition - John Robinson	2	1480D	\$861,000					
Appliance Replacement	2	1480		\$0		\$100,000	\$100,000	\$100,000
		2222		\$100,000	\$100,000	\$100,000	\$100,000	\$100,000
Relocation	2	1480		\$100,000	\$100,000	\$100,000	\$100,000	7200,000
	2	1480 1480D	\$60,000			\$100,000	\$100,000	7200,000

Bug-Rodent Extermination -			\$15,000	\$15,000				
Roosevelt/FV	3	1480	¢35,000	¢r.000	¢r 000	¢r.000	¢r.000	¢r.000
Tree Trimming Selective Interior, Exterior, and Site	3	1480	\$25,000	\$5,000	\$5,000	\$5,000	\$5,000	\$5,000
Repair	3	1480	\$2,000,000	\$2,000,000	\$0	\$0	\$0	\$0
Relocation - Roosevelt/Forest	3	1480	\$0	\$50,000				
Demo - Roosevelt Bldgs 1-9 and 38	3	1480	\$1,300,000	\$500,000	\$200,000	\$200,000	\$200,000	\$200,000
PlayGround Equipent	3	1480	\$25,000	\$20,000	\$20,000	\$5,000	\$0	\$0
Landscaping	3	1480	\$20,000	\$0	\$5,000	\$5,000	\$5,000	\$5,000
Appliance Replacement	3	1480	\$0	\$0	\$0	\$0	\$0	\$0
/illa Griffin, Winstanley, Phoenix Court, and	AMP 4 S	S						Service (Constitution)
Bug-Rodent Extermination - Emmet Griffin and SS	4	1480	\$40,000	\$20,000	\$20,000	\$0	\$0	\$0
Selective Interior, Exterior, and Site Repair (RAD Rehab)	4	1480	\$0	\$0	\$0	\$0	\$0	\$0
Tree Trimming	4	1480	\$25,000	\$5,000	\$5,000	\$5,000	\$5,000	\$5,000
Remove Sheds	4	1480	\$0	\$0	\$0	\$0	\$0	\$0
PARTICIPATE AND ADDRESS OF THE		4 40-	\$40,000	\$0	\$20,000	\$20,000		
Exterior Lighting replacement	4	1480	the state of the s	1,000	area area area area area area area area	10.0000.0000000000000000000000000000000	40	40
NEW TRUCK/W LIFT	4	1480	\$5,000	\$5,000	\$0	\$0	\$0	\$0
HVAC Replacement - Management	,	1490	\$110,000	\$50,000	\$10,000	\$10,000	\$10,000	\$30,000
Office Relocation	4	1480 1480	\$30,000	\$0	\$0	\$10,000	\$10,000	\$10,000
Appliance Replacement	4	1480	\$560,000	\$0	\$10,000	\$50,000	\$100,000	\$400,000
Appliance Replacement	4	1400	\$360,000	\$0	\$10,000	\$30,000	\$100,000	3400,000
RAD Predevelopment Costs	4	1480	\$100,000	\$0	\$0	\$0 ,	\$0	\$100,000
Orr-Weathers Hi-Rise								
Bug-Rodent Extermination - Orr Weath	5	1480	\$40,000	\$10,000	\$10,000	\$10,000	\$10,000	\$0
Selective Building Interior, Exterior, and Site REHAB (GFCI Replacment E2)	5	1480	\$0	\$0	\$0	\$0	\$0	\$0
Appliance Replacement	5	1480	\$200,000	\$0	\$50,000	\$50,000	\$50,000	\$50,000
Demolition - D1 / Relocation	5	1480	\$0	\$0	\$0	\$0	\$0	\$0
Demolition - E2/ Relocation	5	1480D	\$0	\$0	\$0	\$0	\$0	\$0
Bug-Rodent Extermination - Lansdowne	6	1480	\$0	\$0	\$0	\$0	\$0	\$0
Selective Building Interior, Exterior,			\$0	\$0	\$0	\$0	\$0	\$0
and Site REHAB	6	1480						
Relocation Rukavina Bldgs	6	1480	\$0	\$0	\$0	\$0	\$0	\$0
Orr-Weather Lo-Rise								
RAD Rehab	7	1480	\$0	\$0	\$0	\$0	\$0	\$0
Selective Interior, Exterior, and Site REHAB	7	1480	\$0	\$0	\$0	\$0	\$0	\$0
Relocation	7	1480	\$50,000	\$50,000	\$0	\$0	\$0	\$0
cattered Sites								
Bug-Rodent Extermination - Turnkey Scattered Sites	8	1480	\$20,000	\$0	\$5,000	\$5,000	\$5,000	\$5,000
Relocation	8	1480	\$75,000	\$50,000	\$10,000	\$5,000	\$5,000	\$5,000
Tree Trimming	9	1480	\$40,000	\$0	\$10,000	\$10,000	\$10,000	\$10,000
Selective Building Interior, Exterior,			\$4,010,000	\$1,500,000	\$1,010,000	\$1,500,000	\$0	\$0
and Site REHAB (Comp Rehab)	8	1480	\$4,010,000	\$1,500,000	\$1,010,000	\$1,300,000	30	70
Selective Building Interior, Exterior, and Site REHAB	11	1480	\$50,000	\$0	\$0	\$50,000		
cattered Sites - Jazz at Walter Circle								
Selective Building Interior, Exterior, and Site REHAB	12	1480	\$404,615	\$204,615	\$50,000	\$50,000	\$50,000	\$50,000
Jazz @ Walter Circle Aquisition	SAUCTO							1
	12	1480						100

Selective Building Interior, Exterior, and Site REHAB	13	1480	\$100,000	\$100,000	\$0	\$0	\$0	\$0
Selective Building Interior, Exterior, and Site REHAB	11	1480	\$25,000	\$5,000	\$5,000	\$5,000	\$5,000	\$5,000
Management Improvements	Multi	1408	\$50,000	\$10,000	\$10,000	\$10,000	\$10,000	\$10,000
Non-Dwelling Structures and Equipment	Multi	1480	\$4,000	\$0	\$1,000	\$1,000	\$1,000	\$1,000
Development, Dwelling Units	Multl	1480	\$5,850,889	\$0	\$614,651	\$1,365,042	\$1,738,843	\$2,132,353
Contract Administration, Audit Fees, Fees and Costs, Relocation	Multi	1480	\$0	\$0	\$0	\$0	\$0	\$0
Computer Upgrades, Phones	Multi	1408	\$50,000	\$0	\$20,000		\$20,000	\$10,000
Staff Training	Multi	1408	\$110,000	\$20,000	\$30,000	\$20,000	\$20,000	\$20,000
Inspection Costs	Multi	1408	\$100,000	\$20,000		\$20,000	\$20,000	\$20,000
TOTAL				\$5,570,225	\$4,653,451	\$5,5 6 4,842	\$3,583,943	\$4,461,154

Civil Rights Certification (Qualified PHAs)

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

Expires 3/31/2024

Civil Rights Certification

Annual Certification an	d Board Resolution
Acting on behalf of the Board of Commissioners of the Public Housing authorized PHA official if there is no Board of Commissioners, I apprereferred to as" the Plan", of which this document is a part, and make of Housing and Urban Development (HUD) for the fiscal year beginning assistance under 42 U.S.C. 1437f and/or 1437g in connection with the implementation thereof:	ove the submission of the 5-Year PHA Plan , hereinafter the following certification and agreements with the Department
The PHA certifies that it will carry out the public housing the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d—4), 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), title 12101 et seq.), and other applicable civil rights requirement the administration of the program. In addition, if it administ certifies that it will administer the program in conformity vact of 1964, Section 504 of the Rehabilitation Act of 1973 other applicable civil rights requirements, and that it will a of the program. The PHA will affirmatively further fair horactions to further the goals identified in the Assessment of the requirements of 24 CFR § 5.150 through 5.180, that it its obligation to affirmatively further fair housing, and that factors in its programs, in accordance with 24 CFR § 903. CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time a will fulfill the requirements at 24 CFR § 903.7(o) promulg examines its programs or proposed programs; identifies an programs; addresses those impediments in a reasonable fast local jurisdictions to implement any of the jurisdiction's in require the PHA's involvement; and maintains records reflections.	the Fair Housing Act (42 U.S.C. 3601-19), Section II of the Americans with Disabilities Act (42 U.S.C. ats and that it will affirmatively further fair housing in sters a Housing Choice Voucher Program, the PHA with the Fair Housing Act, title VI of the Civil Rights, title II of the Americans with Disabilities Act, and affirmatively further fair housing in the administration using, which means that it will take meaningful Fair Housing (AFH) conducted in accordance with will take no action that is materially inconsistent with it will address fair housing issues and contributing at (7(0)(3)). The PHA will fulfill the requirements at 24 at the PHA is required to submit an AFH, the PHA ated prior to August 17, 2015, which means that it y impediments to fair housing choice within those which in view of the resources available; works with itiatives to affirmatively further fair housing that
Housing Authority of the City of East St Louis PHA Name	IL001000003/IL001 PHA Number/HA Code
I hereby certify that all the statement above, as well as any information provided in the false claims and statements. Conviction may result in criminal and/or civil penalties. (1	
Name of Interim Executive Director: Angela Russell-Perry Signature Wyski 1888 Date 183/2023	Name of Board Chairperson: DeJuan Byrd Signature Date
The United States Department of Housing and Urban Development is authorized to collect the and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to	information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq

Public reporting burden for this information collection is estimated to average 0.16 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.

The information requested does not lend itself to confidentiality. The information is collected to ensure that PHAs carry out applicable civil rights requirements.