



Five Year Consolidated Plan

2010—2014



and
2010 Action Plan

Community Development Block Grant (CDBG)
and
Home Investment Partnerships Grant (HOME)



ST. CLAIR COUNTY BOARD

10 Public Square • Room B561 • Belleville, Illinois 62220-1623

MARK A. KERN
CHAIRMAN



(618) 277-6600
Fax (618) 825-2740

August 12, 2010

Ray E. Willis, Director
Community Planning and Development
U.S. Department of Housing and Urban Development
77 West Jackson Blvd.
Chicago, IL 60604-3507
Attn: Mr. Edgardo Pratz-Reyes

Re: Program Year 2010 Consolidated Plan

Dear Director Willis:

St. Clair County is pleased to submit its Program Year 2010-2014 Consolidated Plan and Program Year 2010 Annual Action Plan in compliance with Title I of the Housing and Community Development Act of 1974, as amended.

Should you or your staff have any questions or need clarification, please do not hesitate to contact Vince Kwiatkowski, Community Development Division Manager at 618-277-6790, ext. 3212 or at vincek@co.st-clair.il.us.

Thank you for your continued support and cooperation with St. Clair County.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark A. Kern".

MARK A. KERN, Chairman
St. Clair County Board

Resolution # 1636-10-R

RESOLUTION

A RESOLUTION AUTHORIZING THE ST. CLAIR COUNTY BOARD CHAIRMAN TO MAKE AND SUBMIT AN APPLICATION TO THE UNITED STATES DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT UNDER THE HOUSING AND COMMUNITY DEVELOPMENT ACT OF 1974, AS AMENDED; AND THE HOME INVESTMENT PARTNERSHIP PROGRAM; FOR PROGRAM YEAR (PY) 2010 FUNDS TO ASSIST THE COUNTY TO FULFILL THE REQUIREMENTS AS OUTLINED IN THE PY 2010 ST. CLAIR COUNTY CONSOLIDATED PLAN/ANNUAL ACTION PLAN DOCUMENTS AND ITS GENERAL PURPOSE UNITS OF LOCAL GOVERNMENT IN IMPROVING GOVERNMENTAL SERVICES, HOUSING CONDITIONS, THE LIVING ENVIRONMENT, AND ECONOMIC OPPORTUNITIES, PRINCIPALLY FOR PERSONS OF LOW OR MODERATE INCOME.

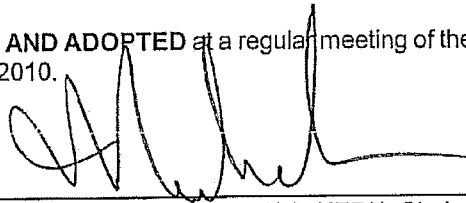
WHEREAS, St. Clair County, Illinois desires to participate in the Community Development Block Grant (CDBG) and HOME Investment Partnership (HOME) Grant Programs as authorized by the Housing and Community Development Act of 1974 as amended, the Cranston-Gonzalez Act of 1990;

WHEREAS, there is a continuing need for affordable housing, adequate infrastructure, fair housing, protection of the environment, enhancement of civic design, and vigorous economic growth for all county citizens and especially for those citizens of low and moderate income; and

WHEREAS, St. Clair County shall be the applicant and fiscal agent for all county, township and municipal projects, (except the Cities of East St. Louis, Collinsville, and Madison, Illinois) eligible for funding under the Housing and Urban Development Act of 1974, as amended ..

NOW THEREFORE, BE IT RESOLVED, by the St. Clair County Board, that the Chairman of the County Board submit an application and PY 2010 Consolidated Plan/Annual Action Plan to the United States Department of Housing and Urban Development under the Housing and Community Development Act of 1974, as amended, and the Home Investment Partnership Act, to undertake essential community development and lower income housing and homeless assistance activities, as specifically provided in said application and plan.

APPROVED AND ADOPTED at a regular meeting of the St. Clair County Board in the State of Illinois, this 26th day of July, 2010.



MARK A. KERN, Chairman
St. Clair County Board Chairman

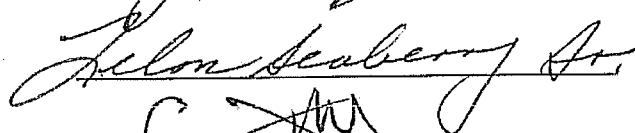
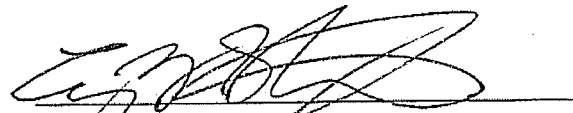
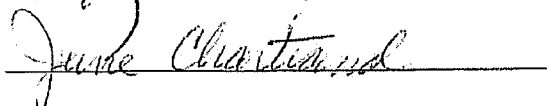
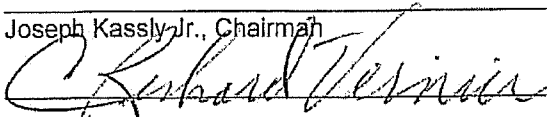
ATTEST: (SEAL)



BOB DELANEY, County Clerk

GRANTS COMMITTEE MEMBERS

Joseph Kassly Jr., Chairman





St. Clair County, Illinois		UOG: IL179163 ST CLAIR COUNTY	▼
St. Clair County Intergovernmental Grants Department		DUNS 115675738	
#19 Public Square		St. Clair County	
Belleville, IL 62220		Intergovernmental Grants Department	
Illinois	62220	Country U.S.A.	Community Development
St. Clair County, Illinois		10/01/10 through 09/30/11	

Employer Identification Number (EIN):	37-6001924
Applicant Type:	Local Government: County ▼

Person to be contacted regarding this application:		
Mark	A.	Kern
Chairman, St. Clair County Board	(ph) 618-277-6600	(fax) 618-236-1190
vincek@co.st-clair.il.us	www.co.st-clair.il.us	Vince Kwiatkowski

"To the best of my knowledge and belief, all data in this application are true and correct, the document has been duly authorized by the governing body of the applicant, and the applicant will comply with the attached assurances if the assistance is awarded." Please update the date with each new Action Plan and CAPER submission.

Name:		Date:	08/12/10
Title:	Chairman, St. Clair County Board	(MM/DD/YY)	

St. Clair County Five-Year Consolidated Plan
2010—2014
and
2010 Action Plan

Table of Contents

	Page
PART I	
A. 5-Year Strategic Plan	1
General	1
Executive Summary	1
General Questions.....	9
Managing the Process.....	13
Citizen Participation.....	16
Institutional Structure	17
Monitoring	21
Priority Needs Analysis and Strategies	24
Lead-Based Paint	26
B. Housing.....	31
Housing Needs	31
Priority Housing Needs.....	44
Housing Market Analysis	49
Specific Housing Objectives.....	54
Needs of Public Housing.....	58
Public Housing Strategy	61
Barriers to Affordable Housing	64

C. Homeless.....	66
Homeless Needs	66
Priority Homeless Needs	67
Homeless Inventory	69
Homeless Strategic Plan.....	77
Emergency Shelter Grants.....	81
D. Community Development	82
Community Development	82
Antipoverty Strategy	89
Low Income Housing Tax Credit (LIHTC) Coordination.....	90
E. Non-Homeless Special Needs.....	91
Specific Special Needs Objectives.....	91
Non-Homeless Special Needs Analysis.....	94
Housing Opportunities for People with AIDS (HOPWA)	103
Specific HOPWA Objectives.....	104

Followed By:

F. Worksheets

 Housing Market Analysis

 Housing Needs Table

 Continuum of Care Homeless Population and Subpopulations Chart

 Housing and Community Development Activities

 Non-Homeless Special Needs Including HOPWA

G. Summary of Specific Annual Objectives

H. Standard Form 424

PART II

I. First Program Year Action Plan.....	1
General	1
Executive Summary	1
General Questions.....	7
Managing the Process.....	11
Citizen Participation.....	14
Institutional Structure	15
Monitoring	16
Lead-Based Paint	17
J. Housing.....	19
Specific Housing Objectives.....	19
Needs of Public Housing.....	20
Barriers to Affordable Housing	22
HOME/American Dream Down Payment Initiative (ADDI).....	23
K. Homeless.....	25
Specific Homeless Prevention Elements	25
Emergency Shelter Grants.....	27
L. Community Development	28
Community Development	28
Antipoverty Strategy	32
M. Non-Homeless Special Needs.....	33
Housing Opportunities for People with AIDS (HOPWA).....	34
Specific HOPWA Objectives.....	35

Followed By:

N. Worksheets

Housing Market Analysis

Housing Needs Table

Continuum of Care Homeless Population and Subpopulations Chart

Housing and Community Development Activities

Non-Homeless Special Needs Including HOPWA

O. Summary of Specific Annual Objectives

P. Annual Housing Completion Goals

Q. Projects Workbook

R. Non-State Grantee Certifications

S. Appendix

Citizen Participation.....	A-1
Public Notice	A-1
Public Hearings.....	A-2
Citizen Comments.....	A-9
St. Clair County Citizen Participation Plan	A-10

FIVE-YEAR STRATEGIC PLAN



3-5 Year Strategic Plan

This document includes Narrative Responses to specific questions that grantees of the Community Development Block Grant, HOME Investment Partnership, Housing Opportunities for People with AIDS and Emergency Shelter Grants Programs must respond to in order to be compliant with the Consolidated Planning Regulations.

GENERAL

Executive Summary

The Executive Summary is required. Include the objectives and outcomes identified in the plan and an evaluation of past performance.

3-5 Year Strategic Plan Executive Summary:

For more than 30 years the federal government has provided annual entitlement support to cities and urban counties of more than 50,000 people for community development purposes. The amount of funding awarded is based on formulas that measure the level of distress in each community and take into account such factors as population, poverty, housing overcrowding/age, and growth lag. Funding is to be used in the implementation of an annual application and an overall multi-year community development strategy known collectively as the Consolidated Plan.

This Consolidated Plan provides a basis and strategy for the use of federal funds granted to St. Clair County and the City of Belleville by the U.S. Department of Housing and Urban Development (HUD) under the Community Development Block Grant (CDBG) and Home Investment Partnership (HOME) programs. St. Clair County, through its Intergovernmental Grants Department (IGD), has a CDBG Cooperation Agreement and a HOME Consortium Agreement with the City of Belleville to administer the CDBG and HOME Programs for both jurisdictions for program years 2009, 2010 and 2011.

This Consolidated Plan covers five program years beginning October 1, 2010 and ending September 30, 2015. Programs and activities described in this plan are intended to primarily benefit low- and moderate-income residents of St. Clair County, neighborhoods with high concentrations of low- and moderate-income residents, other county residents and neighborhoods and the through the prevention and/or elimination of slums and blight. Funds will be distributed to eligible activities throughout St. Clair County. The County also uses this plan to coordinate with other federal and state grant programs and local initiatives.

This plan is the product of extensive public outreach, multiple public hearings, and consultation with dozens of agencies, groups, and organizations involved in the development of affordable housing, creation of job opportunities for low- and moderate-income residents, and/or provision of services to children, elderly persons, persons with disabilities and homeless persons. A complete draft of this plan was made available for public review and comment for a 30-day period beginning July 14, 2010. The availability of both the draft plan and the final plan is

advertised in the local newspaper and the complete documents are available for review on the County's website:

(www.co.st-clair.il.us/Departments/Intergovernmental+Grants/default.htm)

and in print form at the offices of the St. Clair County Intergovernmental Grants Department (19 Public Square, Suite 200, Belleville, Illinois 62220-1624), at the County Courthouse and at various public libraries, senior/community centers, and village/city halls throughout the County. It will also be made available in a form accessible to people with impaired vision and to non-English speaking residents upon request.

St. Clair County currently receives annual funding from two programs administered at the federal level by the U.S. Department of Housing and Urban Development. They are:

- Community Development Block Grant (CDBG)
- Home Investment Partnerships (HOME)

The specific objectives that will be addressed by this Consolidated Plan are:

Objective 1: Create a Suitable Living Environment

Outcome: Availability/Accessibility of Suitable Living Environment

- 100 public facility and improvement projects in and serving low- and moderate income people completed, including improvements to senior, handicapped or youth centers, neighborhood facilities, parking facilities, solid waste disposal, flood drainage, water and sewer systems, streets, sidewalks, fire stations and equipment, and health facilities.
- 20 vacant and deteriorated buildings demolished.

Objective 2: Provide Decent Affordable Housing

Outcome: Availability/Accessibility of Decent Housing

- 20 homes made accessible for elderly and disabled homeowners
- 235 homeless or at risk of becoming homeless households provided with housing counseling and education services

Outcome: Affordability of Decent Housing

- Construction of 5 new homes which are affordable to low-moderate income households.
- Purchase of affordable homes by 100 low- and moderate-income households provided with downpayment and losing cost assistance.

Outcome: Sustainability of Decent Housing

- 85 homes owned by low- and moderate-income households improved and repaired to make them safer, compliant with local building codes and lead safe.
- Emergency home repairs made to 20 homes owned by low- and moderate- income households.

Objective 3: Create Economic Opportunities

Outcome: Availability/Accessibility of Economic Opportunity

- 50 jobs created or retained for low- and moderate-income people.

Available Funds

The priorities and goals outlined in this document are based on assumptions about future funding levels for the Consolidated Plan programs. In all cases, we have used the presumption of level funding for each program at Federal Fiscal Year 2010 levels as outlined on the following page. Because these programs are subject to annual Congressional appropriations as well as potential changes in funding distribution formulas or the number of communities eligible to receive entitlement grants, these projections and planned activities are subject to change with availability of funding. Fluctuations in funding levels will affect the County's ability to achieve the accomplishments anticipated herein.

PY 2010 CDBG	\$2,368,251
Belleville	\$797,341
St. Clair County	\$1,570,910
Sub-Grantees for Capital Improvements	
Public Facility Grants	\$1,593,963.00
Public Services	\$0.00
Public Facility Activity Delivery	\$97,000.00
Demolition/Land Clearance	\$0.00
Subtotal	\$1,690,963.00
St. Clair County Housing Activities (County Wide)	
Housing Rehabilitation Grants	\$83,051.00
Housing Accessibility Grants	\$12,000.00
Activity Delivery	\$58,587.00
Housing Repairs with Lead Hazard Control	\$0.00
Emergency Housing Repairs	\$50,000.00
Subtotal	\$203,638.00
St. Clair County (Administration/Planning)	
	\$473,650.00
Subtotal	\$473,650.00
Total PY 2010 CDBG	
	\$2,368,251.00
Reprogrammed CDBG Funds	
Public Services—Housing Counseling Assistance Center	\$20,000.00
Demolition	\$40,000.00
Subtotal	\$60,000.00
Program Income Expected PY 2010	
Home Loan Program Income	\$193,552.70
CDBG Rehabilitation Revolving Loan	\$756.15
Economic Development Revolving Loan	\$164,869.09
Subtotal	\$359,177.94
PY 2010 HOME	
Affordable Housing Development	\$100,000.00
Homebuyer Assistance	\$100,000.00
Homebuyer Assistance Activity Delivery	\$37,000.00
Housing Rehabilitation Grant	\$472,614.00
Housing Rehabilitation Grant Activity Delivery	\$73,000.00
CHDO	\$156,523.00
Administration	\$104,348.00
Subtotal	\$1,043,485.00
Total HOME	
	\$1,043,485.00
Grand Total	
	\$3,830,913.94

Program Priorities

Infrastructure improvements will remain a primary focus of the CDBG program and maintaining single-family homeownership housing will remain the focus of the HOME program.

In addition to using the limited amounts of CDBG and HOME funds available, the County will continue to use other federal, state and local economic development incentives, including Tax Increment Financing and a variety of state and federal tax credits, for economic and residential development purposes.

To address the priorities, concerns and availability of funding, St. Clair County proposes the following allocations for Program Year 2010:

	CDBG	HOME	TOTAL
Public Facilities and Improvements	\$1,593,963	\$0	\$1,593,963
Public Facilities and Improvements Program Delivery	\$97,000	\$0	\$97,000
Subtotal	\$1,690,963	\$0	\$1,690,963
Rehab—Single-Family Unit Residential	\$145,807	\$666,167	\$811,974
Rehab Admin	\$58,587	\$73,000	\$131,587
Construction of Housing	\$0	\$256,523	\$256,523
Direct Homeownership Assistance	\$0	\$100,000	\$100,000
Homeownership Assistance Program Delivery	\$0	\$37,000	\$37,000
Subtotal	\$204,394	\$1,132,690	\$1,337,084
Economic Development—Direct Financial Assistance to For-Profits	\$164,869	\$0	\$164,869
Subtotal	\$164,869	\$0	\$164,869
General Program Administration	570,650	\$104,348	\$674,998
Subtotal	\$473,650	\$104,348	\$577,998
2010 Entitlement & Program Income	\$2,533,876	\$1,237,038	\$3,770,914
Reprogrammed CDBG Funds			
Public Services	\$20,000	\$0	\$20,000
Clearance and Demolition	\$40,000	\$0	\$40,000
Subtotal	\$60,000	\$0	\$60,000
TOTAL 2010 PROGRAM YEAR	\$2,593,876	\$1,237,038	\$3,830,914

PY 2010 Public Facilities Projects

Community	Project	Award
Alorton	Street Reconstruction—McCasland Avenue	\$80,000.00
Belleville	Resurface/Reconstruct 21 st , 22 nd & Washington	\$478,404.60
Brooklyn	Sanitary Sewer Lining—Washington, Canal, Monroe...	\$80,000.00
Cahokia	Sanitary Sewer Replacement—St. Henry, Gregory, St. Margaret	\$64,000.00
Canteen Township	Install Liner on Sanitary Sewer Wet Well	\$64,000.00
Caseyville Township	Sanitary Sewer Collection System—Pasadena Dr. & Pine Trail	\$64,000.00
Centreville	Drainage/road Improvements—52 nd , 53 rd , 54 th , 55 th , Market	\$60,000.00
East Carondelet	Storm Water Pump Station Improvements—5 th Street	\$42,400.00
Fairmont City	Rehabilitation Sewer trunk Line—Cookson Road	\$64,000.00
Fairview Heights	Street Improvements—Third Avenue	\$60,000.00
Freeburg Township	Remove & Replace Vestibule of the Township Hall	\$64,000.00
Lenzburg	Sanitary Sewer Main Replacement—Elm and Locust Streets	\$56,160.00
Marissa	Replace Sanitary Sewer—Park Street	\$64,000.00
Millstadt Township	Install Emergency Phone/Alarm in Elevator—S. Jefferson	\$2,197.80
New Athens	Waterline Replacement—S. Johnson Street	\$42,800.00
O'Fallon Township	Storm Water Drainage—Behrens and Carson Drive	\$60,000.00
St. Clair Township	Street/Curb/Gutter Improvements-East Main Street	\$60,000.00
Shiloh	Construct Curb and Gutter Storm Sewer—High, Oak, Church	\$60,000.00
Swansea	Sewer Line Slip Lining—Penrose Dr., Kenwood Dr...	\$48,000.00
Washington Park	Street/Drainage Improvements—Westmoreland, Hallows...	\$80,000.00
		\$1,593,962.40

Evaluation of Past Performance

St. Clair County has consistently carried out the priorities and objectives identified in its current Consolidated Plan (2005—2009) and continued to do so in its most recently completed program year ending on September 30, 2009. Identified priorities and major initiatives undertaken to address them were:

Affordable Housing Needs of Low and Moderate-Income Households:

1. Homebuyer assistance and counseling
2. Single-family home rehabilitation
3. Emergency home repair
4. Single-family home accessibility improvements for elderly and disabled homeowners
5. Construction of single-family homes
6. Construction of multi-family rental units

Our performance as of the end of year four of the current Consolidated Plan period was consistent with these priorities. Our goals were to:

1. Provide assistance to 83 eligible first-time low- and moderate-income households to purchase decent, safe, and sanitary housing
2. Make improvements and repairs to 63 single-family homes to bring them up to building code standards
3. Provide 6 emergency home repairs to single-family homes
4. Provide accessibility improvements to 4 homes owned by elderly and disabled homeowners

5. Complete construction and sale of 8 affordable single-family homes
6. Complete construction of 10 multifamily rental units

By the end of year four, our CDBG and HOME programs actually:

1. Provided downpayment and closing cost assistance to allow 79 low- and moderate income households purchase single-family homes
2. Made improvements and repairs to 38 single-family homes
3. Made emergency home repairs to 16 single-family homes
4. Made accessibility improvements to 4 homes owned by disabled homeowners
5. Completed construction of 6 affordable single-family homes
6. Neared completion of construction of 48 multifamily rental units for low-income seniors, of which 2 are affordable HOME-assisted units

The County is on track to meet its Consolidated Plan goals for affordable housing needs. Staff has reviewed ways to increase participation in the home repair program, including streamlining the application process and automating the inspection write-ups.

Other Housing Related Issues

- Make single- and multifamily homes lead-safe

Our performance as of the end of year four of the current Consolidated Plan period was consistent with this priority. Our goal was to:

- Make 180 single- and multifamily homes lead-safe

By the end of year four, our CDBG and Lead Hazard Control programs actually:

- Made 184 single- and multifamily homes lead-safe

The County exceeded its Consolidated Plan goal for lead-safe housing needs.

Housing and Supportive Service Needs of Homeless/Chronically Homeless

1. Housing Counseling and Assistance Center (HCAC) and Homeless Action Council (HAC) participation in Continuum of Care Grant application and administration process;
2. Coordination between the Community Development and Community Services Divisions of IGD

Our performance as of the end of year four of the current Consolidated Plan period was consistent with this priority. In program year four:

- The St. Clair County IGD Community Action Agency, Community Services Division's Emergency Crisis Intervention Program assisted 1,896 people (749 households)

- The Community services Division's Emergency Food and Shelter Program assisted in preventing homelessness by providing 68 households with utility assistance

Public Facilities/Infrastructure/Demolition

1. Public facilities and improvements
2. Building demolition

Our performance as of the end of year four of the current Consolidated Plan period was consistent with this priority. Our goal was to:

1. Complete 21 public facility and improvement projects in 18 months
2. Demolish 6 derelict houses

By the end of year four, our CDBG program actually:

1. Completed 16 public facilities and improvements projects
2. No structures have been demolished

The County is on track to meet its Consolidated Plan goals for public facilities and improvements. Infrastructure improvement project completion dates often extend past the end of the program year because of poor weather, inability to secure building materials, inability to secure easements, or annual winter asphalt plant shut-downs. Although no structures have been demolished yet, funds have been committed to demolish 6 structures in Centreville Township; a contract has been executed with the Township; a list of potential demolition sites has been completed; and environmental review has been completed.

Economic Development

- Low-interest loans to businesses for the purpose of job retention and creation

Our performance as of the end of year four of the current Consolidated Plan period was consistent with this priority. Our goal was to:

- Create or retain permanent jobs, 51% of which to be filled by low- and moderate-income people

By the end of year four, our CDBG program actually:

- 17 jobs retained, 10 filled by low- and moderate-income people

The County is meeting its Consolidated Plan goals for economic development.

Strategic Plan

Due every three, four, or five years (length of period is at the grantee's discretion) no less than 45 days prior to the start of the grantee's program year start date. HUD does not accept plans between August 15 and November 15.

General Questions

1. Describe the geographic areas of the jurisdiction (including areas of low income families and/or racial/minority concentration) in which assistance will be directed.
2. Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA) (91.215(a)(1)) and the basis for assigning the priority (including the relative priority, where required) given to each category of priority needs (91.215(a)(2)). Where appropriate, the jurisdiction should estimate the percentage of funds the jurisdiction plans to dedicate to target areas.
3. Identify any obstacles to meeting underserved needs (91.215(a)(3)).

3-5 Year Strategic Plan General Questions response:

1. St. Clair County is located along the Mississippi River in southwestern Illinois. It is one of two urban counties that are part of the St. Louis, Missouri Metropolitan Area. The County includes every conceivable land use, ranging from agricultural to suburban to urban. This Plan covers the entire County, with the exception of Scott Air Force Base and the City of East St. Louis, Illinois (which, as an entitlement community, is responsible for its own Consolidated Plan and related activities carried out in its jurisdiction.)

In the 1900's, jobs were plentiful in the Communities in the northern and western parts of the County, called the American Bottoms, particularly in and around East St. Louis. There were many jobs in heavy industrial, railroads and agricultural. Large labor-intensive industries and the railroads hired local residents and employment levels were high until after World War II. But industry and employment opportunities have shifted drastically over the years. Changes in technology and patterns of distribution made St. Clair County's heavy industries functionally obsolete. Meat packing employment for example, so strong in the St. Louis-East St. Louis area until the 1960's and '70's, is virtually non-existent today. Newer, more efficient processing plants were built closer to the ranches and farms where animals are raised. The last 50 years has seen a sharp decline in available jobs in these industries nationally as well as locally. Banking, computer technology, management, as well as high tech manufacturing jobs are replacing these older industries.

Although railroad employment has severely declined, the greater St. Louis region is still the nation's second largest rail center and the river system in the area provides for easy barge transport. In fact, the St. Louis region has one of the largest inland ports in the nation. The St. Clair County comprehensive plan states that growth will come from regional advantages including "an excellent

transportation system, access to major markets, large developable land areas, the presence of both the Mississippi and Kaskaskia Rivers, and the proximity of Scott Air Force Base."

County officials also view the future as tied to transportation. The area is served by two major airports, the well-established Lambert International Airport in St. Louis and the newer Mid-America Airport, which has the potential to provide cargo, commercial and charter services. The highly successful MetroLink light rail system runs from Lambert International Airport through East St. Louis to Scott Air Force Base, by far the County's largest employer. The County is also served by an extensive system of interstate highways (I-70, I-64, I-55, & I-255).

St. Clair County will continue to compete more vigorously with St. Charles, West and South St. Louis Counties in Missouri for new jobs and development. While it is possible economic development will also move into the bottoms areas, residential and commercial development around O'Fallon, Fairview Heights, Shiloh, Swansea and Belleville is much stronger. Development activity in recent years is also reflected in an overall decrease in the County's rural population. The County's rural population in 2000 was 11% as compared to 13% in 1990.

Nearly one-third of the County's employed residents commute to work outside of the County's borders. However, more jobs and residents are expected in the County due to:

- Increased usage of Mid America Airport located at Scott Air Force Base
- The presence of the MetroLink light rail, which runs from downtown East St. Louis to Scott Air Force Base
- The construction of a new bridge between Missouri and Illinois
- The continued commercial and residential development that has made the Metro East one of the fastest growing areas in the Country.

Demographic Quick Facts	St. Clair County	St. Louis MSA (IL-MO)
Population Estimate, July 2009	263,617	2,828,990
Households, 2006	101,064	1,048,552
Median Age, 2006	35.6	37.2
Labor Force, June 2010	126,701	354,509 (IL part-St. Louis MSA)
Unemployment Rate, June 2010	11.0%	10.2% (IL part-St. Louis MSA)
Median Household Income, 2006	\$46,643	
Homeownership Rate, 2006	71%	

Largest Employers	Industry	Employment
Scott Air Force Base	Military	14,150
Memorial Hospital	Health Care	2,400
St. Elizabeth Hospital	Health Care	1,750
Southwestern Illinois College	Education	1,700
Midcoast Aviation	Aircraft Repair/Modification	1,600
Southern IL Healthcare Foundation	Health Care	1,400
Regions Bank	Financial Services	1,200
East St. Louis Schools	Education	1,000
St. Clair County	County Government	1,000
Casino Queen	Leisure/Hospitality	745
Belleville Schools	Education	700
O'Fallon Schools	Education	664
Allsup, Inc.	Disability Claims Services	600
Cahokia Schools	Education	461
Alton & Southern Railway	Railroad	350
City of Belleville	City Government	350
Metro East Industries	Railcar & Locomotive Repair	330
Afton Chemical	Manufacturing	275
Belleville News Democrat	Newspaper	250
The ROHO Group	Manufacturing	242
McKendree University	Education	223
Science Applications Intl. Corp.	IT Systems/Solutions	212
Shrine of Our Lady of the Snows	Religious & Tourism	200
Belleville Shoe Company	Manufacturing	200
Dental Network of America	Call Center	200
Helitech	Construction Services	200

The County's population showed a small (2.5%) decline from 262,853 in 1990 to 256,082 in 2000, whereas the remaining greater St. Louis area grew by 4 percent. The County's African-American population increased from 27% in 1990 to 29% in 2000. There were 36,358 persons in St. Clair County with incomes below the poverty level in 2000; 15,253 children under 18 in family households and 3,098 people 65 years and over were below the poverty level. The total number of families in the County with incomes below the poverty level increased by 1% since 1990 to 7,998, or 12% of all families. Of the 7,998 families living in poverty, 5,426 (68%) were single female-headed households, 1,758 (22%) were married couples, and 814 (10%) were headed by single males.

Forty-eight (48%) of all County households are headed by married couples, a decrease of 4% since 1990. The average household size also decreased as result of changes in household composition and the number of housing units located in the County increased to accommodate changing household composition.

But there are sharp contrasts in the economic status of St. Clair County residents. Communities in the American Bottoms have widespread poverty with accompanying blight and abandonment, while those on the bluffs, such as Belleville, Fairview Heights, and O'Fallon, have extensive residential and commercial development. Eastern and southern portions of the County are essentially rural in character. Residential opportunities differ extensively, from peaceful wooded countryside homes that are beautifully landscaped, to dilapidated unsafe buildings located in areas with significant infrastructure problems.

The American Bottoms communities have become economically distressed over the past 50 years as more affluent residents moved from the bottoms to the bluffs and to nearby Missouri communities. The African-American population is mostly concentrated in the American Bottoms in and around East St. Louis and collar communities. This is one of the largest minority concentrations in the State of Illinois. This area has been significantly affected by the exodus of many middle-class and affluent minority households migrating to formerly all-white or majority-white suburban communities. Consequently, the bottom communities suffer from disinvestment, few economic opportunities, a disproportionate number of poor residents and a housing stock that has increasingly become housing of last resort. As has been the case in similar situations across the nation, the disinvestment has also resulted in a lack of resources in affected school districts and a decline in positive perceptions of the affected communities.

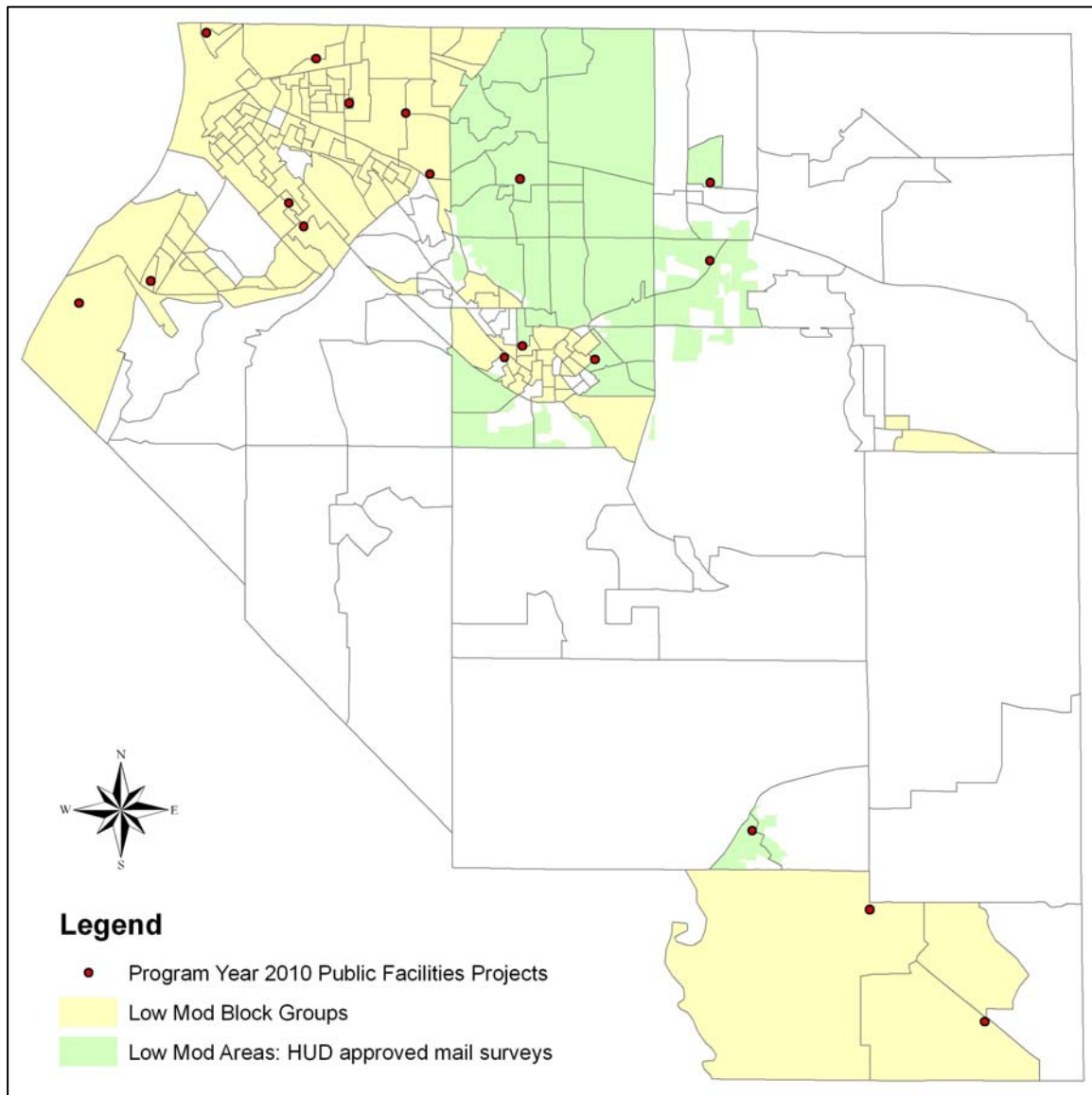
Although female-headed households comprised 17% percent of all County households, an increase of 1% since 1990, the more distressed bottom communities, such as Brooklyn (40%) and Alorton (46%), have a disproportionate number of single female heads of households.

Population changes have also varied dramatically by age group. The number of middle-aged and elderly residents grew, whereas the ranks of children, young adults and older working-aged adults declined.

Housing expenses have increased for renters and homeowners alike. Low to moderate-income persons pay a larger percentage of their income for housing than those with higher incomes.

2. For the 2010 through 2014 program years activities funded through the CDBG program will be concentrated in low/moderate income areas, although some will benefit limited low-moderate income clientele and some limited activities may be provided to other areas that are exhibiting signs of slums or blight. We expect that the activities to be carried out with the County's CDBG and HOME funding from 2010 through 2014 will fall within three general categories—Public Facilities and Improvements, Housing and Economic Development. St. Clair County will allocate a significant portion of its CDBG funds to assist public facilities and improvements in those northern and western portions of the County with greater needs, particularly in American Bottoms communities. Our housing activities (rehabilitation of existing housing, affordable housing development and homeownership assistance), will be targeted to households at income levels that are more predominant in these same communities. HOME funds must be utilized for housing activities benefiting low- and moderate-income households and will be targeted accordingly.

The map below shows the low-moderate income areas of the County based on 2000 census figures and the anticipated locations of non-residential CDBG funded activities. Other locations and activities may be added if funding is increased, and some locations may be deleted if funding is decreased.



3. The primary obstacle to meeting all of the identified needs, including those needs identified as a high priority, is the general lack of funding resources available to the public and private agencies who serve the needs of low- and moderate-income residents. The level of federal funding has declined while neither state nor local funds have been able to fill the gap, especially for non-housing needs. Between 2002 and 2008, the County's annual CDBG and HOME

entitlement funds have been cut by 22% and 24% respectively. These cuts greatly affect our efforts to meet the needs identified in this consolidated plan. Local communities do not have the resources to address these needs adequately either. The needs are so great in these communities that HUD Entitlement funds alone, even leveraged with other resources are insufficient to reverse the decades of decline. Local governments have difficulty gaining approval to increase local taxes to make repairs or improvements to public facilities and infrastructure, let alone address affordable housing needs.

An obstacle to meeting the needs for low-moderate income households to become homeowners is that they are often inadequately prepared for it. The County continues to provide comprehensive housing counseling services to all successful participants in the IGD Community Development Division's housing programs. Homebuyer assistance and affordable housing development programs are also more difficult in the older, poorer, minority communities that border the City of East St. Louis, due to nearby blight, crime, weak economic bases, low-performing school districts and infrastructure needs that exceed available resources. In addition, the continued decline of the housing market has led developers to request even larger subsidies to make affordable housing development feasible.

Adequate funding is an obstacle to providing temporary, transitional and permanent housing for the homeless and sometimes community resistance can hamper the creation, location or expansion of agencies serving the near homeless, homeless and/or chronically homeless.

Vacant, derelict buildings are an obstacle to making suitable living environments available for low-moderate income households. They are public health and safety hazards that reduce property values, cause disinvestment to accelerate, and invite the nuisance behavior and criminal activity that make neighborhoods less desirable places in which to live.

Managing the Process (91.200 (b))

1. Lead Agency. Identify the lead agency or entity for overseeing the development of the plan and the major public and private agencies responsible for administering programs covered by the consolidated plan.
2. Identify the significant aspects of the process by which the plan was developed, and the agencies, groups, organizations, and others who participated in the process.
3. Describe the jurisdiction's consultations with housing, social service agencies, and other entities, including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, and homeless persons.

*Note: HOPWA grantees must consult broadly to develop a metropolitan-wide strategy and other jurisdictions must assist in the preparation of the HOPWA submission.

3-5 Year Strategic Plan Managing the Process response:

1. The lead agency overseeing the development of this plan and for administering the programs covered by the plan is the St. Clair County Intergovernmental Grants Department (IGD). IGD also provides a meeting place and clerical services for the Community Action Agency (CAA), which provides a range of services that assist low-income individuals to achieve self-sufficiency and helps develop partnerships with other social service providers. IGD also provides staff for the Homeless Action Council (HAC) Planning Committee to assist the Continuum of Care (CoC) in the implementation of the ten-year plan to end homelessness.

IGD has four divisions: Community Development (CD), Community Services (CS), Employment and Training (ET) and the Fiscal Division, which performs the financial functions for the other divisions.

IGD'S CD Division coordinates and implements the Consolidated Plan. It coordinates the provision of services funded by the Community Development Block Grant and HOME Investment Partnerships Programs, Illinois Housing Development Authority and Weatherization Grants. IGD has a Cooperation Agreement and a HOME Consortium Agreement with the City of Belleville for Program Years 2009, 2010 and 2011, so the CD Division also administers Belleville's CDBG and HOME funds.

The CS Division provides programs for poverty-level clients and oversees the Community Services Block Grant (CSBG). The ET Division coordinates the Workforce Investment Act (WIA) Program in St. Clair, Clinton, Monroe, Randolph and Washington Counties.

A fifth unit, the Housing Counseling and Assistance Center (HCAC), also operates under the IGD umbrella. It operates Continuum of Care Programs for the homeless and near homeless, as well as administering Fair Housing and other housing counseling and education efforts.

The County also has a separate Department of Economic Development. This department promotes economic development activities throughout the entire region, focusing on the redevelopment of the urban core communities along the Mississippi River.

A substantial portion of the St. Clair County and City of Belleville CDBG budget is used for public facilities and improvements. To plan for public facility priorities and budgeting, each year in mid-to-late January the St. Clair County Intergovernmental Grants Department's Community Development Division mails applications to all communities/townships in the Entitlement Area. Applications may also be provided to engineering firms that service these communities. Total CDBG funding for public facilities and improvements is decided upon based on HUD estimates for the coming entitlement year. Based on this, the County estimates a CDBG Public Facility Grant allocation for planning purposes for the coming Program Year

IGD staff notifies communities, townships, and their engineering firms of a technical assistance meeting. The meeting is held within two weeks of the

application mailing. Applications are also available at the meeting. IGD staff discusses any changes or answer questions regarding the applications. Communities and townships are given approximately 9 to 10 weeks to complete and return applications (usually late March). IGD staff discusses this and other requirements at the technical assistance meeting.

When applications are received, IGD staff review them for CDBG eligibility and score them based on a rating sheet that uses factors including community need, past performance, and the percentage of low-moderate income population that will benefit from the improvements. The scoring is only a general indication of the critical need to fund the project, and highest-scoring projects may not necessarily be recommended.

Only communities or townships are eligible to submit an application. Other entities, such as fire protection districts, may seek support from a community/township in which they are located to submit an application on their behalf. Projects to be recommended for funding are submitted to the St. Clair County Board Grants Committee usually in May or June for approval.

Finally, at the recommendation of IGD, the County Board approves a Resolution and budget authorizing IGD and the County Board Chairman to submit the public facilities and improvements projects in the Annual Action Plan that is submitted to HUD.

2. This Consolidated Plan was developed with active citizen participation, including consultations, informational meetings, needs assessment surveys and public hearings to solicit input and participation from public and private agencies (county-wide elected officials, social service providers and citizens).

The County held initial meetings to receive input from citizens on community development needs and the development of the 2010-2014 Consolidated Plan on three different dates and at three different sites. The intent was to assure input to those with a variety of work, family, or other schedules. The first meeting was held on March 9, 2010 at the Centreville City Hall. The second meeting was held on March 10, 2010 at the New Athens Community Center and the third meeting was held on March 15, 2010 at the City of Lebanon City Hall.

Another meeting was held for citizen review and comment on the initial draft plan on Thursday, May 6 at the St. Clair County Court House in the St. Clair County Board Meeting Room. Summaries of these meetings are provided in the appendix.

All sites were ADA accessible, and provisions were made for people with disabilities. Signing was made available for those with hearing impairments and translators were available upon request for non-English speaking attendees.

Public notices informing citizens about the public meetings regarding the Consolidated Plan were published in the most widely circulated newspaper and were posted at meeting locations and on the County's official web site.

3. The development of this Consolidated Plan Document required the expertise, knowledge, skill, and input of various government and social service agencies

and the public which the IGD serves, including the St. Clair County Housing Authority, the Community Action Agency, Homeless Action Council, the chief elected officials of all townships throughout the County and a broad array of service provider agencies.

Citizen Participation (91.200 (b))

1. Provide a summary of the citizen participation process.
2. Provide a summary of citizen comments or views on the plan.
3. Provide a summary of efforts made to broaden public participation in the development of the consolidated plan, including outreach to minorities and non-English speaking persons, as well as persons with disabilities.
4. Provide a written explanation of comments not accepted and the reasons why these comments were not accepted.

*Please note that Citizen Comments and Responses may be included as additional files within the CPMP Tool.

3-5 Year Strategic Plan Citizen Participation response:

1. This Plan was developed with active citizen participation, including consultations, informational meetings and needs assessment surveys. Public hearings on the Consolidated Plan to solicit input and participation from public and private agencies (countywide Elected Officials, Social Service Providers and citizens) were held throughout the County at multiple sites to foster a variety of input and maximize citizen attendance. Three initial hearings for needs determination were held at various sites in the County. These locations included Centreville, New Athens and Lebanon. Minutes of these meetings are included in the Appendix.

The first draft of the Consolidated Plan was published for public review on the St. Clair County website (www.co.st-clair.il.us) on April 30, 2010 and a hearing was held for public comment on the draft plan on May 6, 2010. A notice of the availability of the summary plan was published in the newspaper and copies of the summary plan were made available to the public at various locations (Belleville and Lebanon public libraries, Shiloh Senior Center, Washington Park Senior Center and the St. Clair County Intergovernmental Grants Department.) A copy of St. Clair County's Citizen Participation Plan is included in the Appendix.

Notices announcing the meetings were posted at high-traffic sites (town halls, libraries, community centers, etc.) and circulated in the County's most widely circulated newspaper. Minutes of these meetings are included in this Plan.

2. Citizen questions and comments and responses are included in the meeting summaries included in the Appendix.

3. St. Clair County encouraged its citizens to participate in the development of the Consolidated Plan, particularly low-moderate income persons where the County has plans to use CDBG and HOME funds. The County also took steps to encourage the participation of minorities and people with disabilities. All public meeting sites were ADA accessible and interpreters were provided for those with hearing disabilities or language barriers. In consultation with the St. Clair County Housing Authority, the County also encouraged the participation of residents of public and assisted housing developments in developing and implementing the Consolidated Plan. With the assistance of SCCHA, flyers notifying public housing residents about the publication of the proposed plan and the opportunities to review and comment upon it were posted at public housing development sites.

The availability of the proposed Consolidated Plan and a list of the locations where copies of the proposed Consolidated Plan could be examined, was published on July 12, 2010 in the Belleville News Democrat (the newspaper having the largest circulation in St. Clair County) to afford citizens, public agencies, and other interested parties a reasonable opportunity to examine its contents and to submit comments. The proposed plan was made available on the St. Clair County website on July 16, 2010 and copies were made available at libraries, government offices, and other public places. In addition, the County provided free copies of the proposed plan to citizens and groups that requested it.

4. All citizen comments were accepted and taken into consideration in the development of this Consolidated Plan.

Institutional Structure (91.215 (i))

1. Explain the institutional structure through which the jurisdiction will carry out its consolidated plan, including private industry, non-profit organizations, and public institutions.
2. Assess the strengths and gaps in the delivery system.
3. Assess the strengths and gaps in the delivery system for public housing, including a description of the organizational relationship between the jurisdiction and the public housing agency, including the appointing authority for the commissioners or board of housing agency, relationship regarding hiring, contracting and procurement; provision of services funded by the jurisdiction; review by the jurisdiction of proposed capital improvements as well as proposed development, demolition or disposition of public housing developments.

3-5 Year Strategic Plan Institutional Structure response:

1. IGD was established over two decades ago, based on the concept of coordination, with sharing and leveraging of scarce resources from various programs and grants as a priority. Four divisions (which could operate independently under other circumstances) were unified under the umbrella agency of IGD. In this manner, all overhead expenses such as rent, utilities and local computer networks are shared. The four divisions are Community Development (CD), Community Services (CS), Employment and Training (ET)

and the Fiscal Division, which performs the financial operations for the other divisions.

In addition to the CDBG and HOME programs, IGD administers the Community Services Block Grant (CSBG); Low Income Home Energy Assistance Program (LIHEAP); Weatherization Assistance Program; HUD Continuum of Care grants in conjunction with the St. Clair County Homeless Action Council; and Workforce Investment Act (WIA) programs. These grants provide funds for energy bill assistance, medical care, rental assistance, mortgage assistance, employment counseling and training, as well as housing repairs, housing rehabilitation, fair housing counseling, homebuyer assistance and counseling, housing accessibility grants and other programs that meet the needs of extremely low, very low, low and moderate-income people in the community.

IGD is headed by the Executive Director, who has line responsibility to the Chief Executive Officer of St. Clair County, (the County Board Chairman), an at-large elected officer who works with a district-elected County Board to administer county programs. The Manager of each of the four divisions is directly responsible to the Executive Director. St. Clair County's Consortium with the City of Belleville provides CDBG-funded programs in the City of Belleville.

The Community Development (CD) Division of the St. Clair County Intergovernmental Grants Department coordinates and implements the Consolidated Plan. CD has three sections: Program Administration (including Public Facilities), Housing and Weatherization. The Housing Program Unit administers owner-occupied single family housing rehabilitation grants and loans, a new home construction and a homebuyer's assistance program.

IGD has a Cooperation Agreement and a HOME Consortium Agreement with the City of Belleville for Program Years 2009, 2010 and 2011. IGD's CD Division administers Belleville's CDBG and HOME funds and IGD and East St. Louis are partners in the application and operation of the Continuum of Care process.

The close proximity of these programs saves money. It also lends itself to a sharing of expenses, knowledge about each other's programs, and a sharing of clients. St. Clair County places a high priority on the coordination and leveraging of resources and services with other public and private resources.

The CD Division coordinates and implements the Consolidated Plan and coordinates the provision of services funded by the Community Development Block Grant, HOME Investment Partnerships, Illinois Housing Development Authority and Weatherization Grants.

IGD has a management agreement with the Community Action Agency Board of Directors to provide administrative personnel and fiscal services for the Community Action Agency. The IGD Executive Director serves as Executive Director of the 15-member board of directors. Through IGD's CS Division the CAA provides a range of services that assist low-income individuals to attain skills, knowledge and motivation necessary to achieve self-sufficiency. Services available through the CAA include emergency crisis intervention, scholarships, clothing assistance, family development, transportation, food vouchers, medical/dental vouchers, temporary emergency shelter, prescription vouchers,

utility assistance, homeless/near homeless assistance, recreational activities, advocacy, case management, information and referrals.

The CAA has developed partnerships with other social service providers and faith-based organizations to ensure that the needs of the low-income population are being addressed. Those partnerships include:

- Illinois Department of Human Services
- Catholic Urban Program
- Lessie Bates-Davis Neighborhood House
- East St. Louis Housing Authority
- St. Clair County Housing Authority
- Call for Help
- Homeless Action Council
- Programs and Services for Older Persons (Southwestern Illinois College)
- Living Independently Now Center (LINC), Inc.
- American Red Cross
- Beacon of Belleville
- St. Clair County Court Appointed Special Advocate (CASA)
- Okaw Valley Council Boys Scouts of America
- Urban League of Metropolitan St. Louis'
- Illinois Division of Employment Security One-Stop Centers
- Interfaith Partnership
- Violence Prevention Center of Southwestern Illinois
- CDBG Operations, Inc.
- St. Clair County Veterans' Assistance Commission
- Comprehensive Behavioral Health Center

IGD's ET Division coordinates the Workforce Investment Act (WIA) Program in St. Clair, Clinton, Monroe, Randolph and Washington Counties. Local Workforce Area (LWA) #24 provides employment and training services through the Mid-America Workforce Investment Board, comprised of businesses, economic development, education, labor and community-based organizations, and partners in local One-Stop Centers. The partners include:

- St. Clair County Intergovernmental Grants Department,
- St. Clair County Housing Authority,
- St. Clair County Adult Education,
- Local Community Colleges,
- Programs and Services for Older Persons (operated by Southwest Illinois College),
- Illinois Department of Human Services (TANF),

- Illinois Department of Human Services (ORS),
- Illinois Department of Employment Security, and
- Members of local businesses that represent local hiring opportunities; which make up a majority of the Workforce Investment Board.

A fifth unit also operates under the IGD umbrella. It is the Housing Counseling and Assistance Center (HCAC). It operates Continuum of Care Programs for the homeless and near homeless, as well as administering Fair Housing and other housing counseling and education efforts. The Program Manager holds the position of Coordinator of the Homeless Action Council (St. Clair County Continuum of Care.) The County provides staff for the Homeless Action Council (HAC) Planning Committee to assist the Continuum of Care (CoC) in the implementation of the ten-year plan to end homelessness.

A number of years ago the County took the lead in coordinating the merger of 33 not-for-profit and government agencies into the Homeless Action Council. Through HCAC it also took the lead in the development of a Local Area Network. The network operates with the "ROSIE" (Regional On-Line Service Information Exchange) software, a HUD-owned and approved system.

St. Clair County also has a separate Economic Development Department. This department promotes economic development activities throughout the entire region, focusing on the redevelopment of the urban core communities along the Mississippi River.

2. The institutional structure through which we carry out our consolidated plan has many strengths; the chief of which is coordination. By providing so many services under one umbrella, we minimize our administrative costs and administer our federal and state housing rehabilitation, public works, employment and training, weatherization, energy assistance and Community Services Block Grant Programs more efficiently.

Providing services to rural areas of the county has proven to be challenging. Due to the lack of public transportation operating in these areas, rural populations find it difficult to access program sites but it is also economically infeasible to provide program sites in such remote locations.

3. The St. Clair County Housing Authority (SCCHA) is a public body chartered by the State of Illinois consisting of a five-member Board of Commissioners. Although the SCCHA is independent of St. Clair County, the County does maintain a degree of control in the form of appointments to the SCCHA's Board of Commissioners. The St. Clair County Board Chairman appoints all five Board members, subject to the approval of the St. Clair County Board, the County's legislative body. The SCCHA Board of Commissioners hires the Executive Director. The SCCHA's hiring, contracting and procurement is done with the advice and consent of its Board of Commissioners, independently from St. Clair County government. Residents of public and assisted housing are entitled to the use and benefit of services provided and funded by St. Clair County the same as all residents of the County.

SCCHA and IGD have a close working relationship, sharing plans, goals and reports with each other. SCCHA notifies IGD of provision of services, proposed

development, demolition or disposition of public housing developments. The County maintains some oversight of proposed sites for public or assisted housing development and the SCCHA's development and redevelopment plans are subject to applicable building and zoning reviews by the County. Proposals that fall within the boundaries of designated redevelopment plan areas are reviewed by the corresponding redevelopment authority under the County ordinances and Illinois statutes. The SCCHA's Five-Year Plan is also coordinated with the content of this Consolidated Plan.

SCCHA has identified a gap in the delivery system for public housing in that the rental housing stock available in St. Clair County is inconsistent with waiting list patterns, especially for the Section 8 Housing Choice Voucher program. There is an insufficient supply of good quality large-family (3 bedrooms or more) rental units in desirable locations.

Monitoring (91.230)

1. Describe the standards and procedures the jurisdiction will use to monitor its housing and community development projects and ensure long-term compliance with program requirements and comprehensive planning requirements.

3-5 Year Strategic Plan Monitoring response:

1. Programmatic Monitoring

Program compliance monitoring and performance evaluation reviews of all IGD subrecipients/subgrantees are performed by IGD CD staff. Any programmatic revision must have IGD approval before being implemented. Subrecipients are required to submit either monthly programmatic information detailing the progress of their program objectives. During the contract year, IGD CD staff conducts at least one formal monitoring review at the subrecipient's site, completes documentation that details their compliance with HUD regulations, and evaluates the subrecipient's performance and ability to meet the goals and objectives outlined in their contract with IGD.

IGD staff uses specific public facility and improvement project information supplied by the project application or the application preparer with the specific geographic location, project description and budget information to complete a CDBG project contract. The contract is then submitted to an IGD CD Program Coordinator to check for accuracy. It is then sent to the community for authorized signatures and returned to IGD. When returned, the contracts are fully executed and sent back to the community with an "Authorization to Proceed" letter from the County Board Chairman.

IGD staff assembles a "Documentation Package", which includes a Davis-Bacon (Prevailing Wage) Wage Decision, and IGD Bid Specification Requirements. The package is sent to the community engineering firm responsible for the project. The "Documentation Package" is included in the community bid package, following federal, state and local procurement requirements.

The project plans and specifications are submitted to IGD for review by IGD staff. If approved, an Authorization to Advertise for Bids is issued. One set of

plans/specs is forwarded to Southern Illinois Builders Association (SIBA), along with a bid opening date. All bids submitted for public facility and improvement projects must be opened publicly.

After bids are tabulated, the tabulations along with copies of letters to unsuccessful bidders, and certified advertisements for bids, are provided to IGD staff, a preconstruction conference date is set and held, and a construction start date is set.

IGD staff maintains a ledger book for each contract, showing original amount of funds available, any funds added, and any payments made, with the date of each transaction noted, along with back-up documentation. They also take photographs of the project before, during and after construction. Staff interviews project workers to assure Davis Bacon wage and job assignments are correct. IGD staff review requests for payment from communities. These requests must be accompanied by original documentation of work performed, invoices from any Minority Business Enterprise (MBE) contractors, and weekly payroll records. Payroll records must be sent even if no work was performed. Payroll records *must* be received and checked before IGD will make any payouts.

When the final pay request, signed by the chief elected official of the community or designated party, is submitted to IGD for payment, final lien waivers and an engineer's written approval accompanying the financial documentation must be submitted.

In any situation where all CDBG funds awarded to a project have been spent but the project continues with other sources of funds, IGD continues to monitor the project until the entire project is complete.

IGD requires written authorization to any project Change Order calling for an increase or decrease in the original project contract bid price before the proposed additional work starts. IGD pays all project vendors directly rather than reimbursing municipalities. However, IGD reserves the right to consider direct reimbursement on an individual basis.

Communities may submit a written request to change a project scope or location. If the change is considered "less than substantial," and IGD approves, a contract amendment is prepared and executed to reflect the change. The change is noted in the Consolidated Annual Performance Evaluation Report (CAPER) for that year, describing why the original goals and objectives changed and the progress made toward meeting the new goals and objectives.

A "substantial change" is defined in the St. Clair County Citizen Participation Plan as a change in the use of CDBG or HOME funds from one eligible activity to another, if the change involves an amount greater than ten percent of the total County CDBG and HOME grants for the year in which the change is being made, if there is a meaningful change in the geographic location, or if the change in location would result in a substantial decrease in the number of low or moderate-income persons benefiting from the activity.

Substantial changes follow the same review procedures as the original contract. The amendment is added to the County website and a detailed written notice

(newspaper ad) is made available for public review and comment for at least 15 days. Then the substantial change is reported to HUD as a “Substantial Amendment” to the most recent HUD–approved Annual Plan. All substantial changes are also added to the Consolidated Annual Performance Evaluation Report (CAPER) for that year.

Fiscal Monitoring

Fiscal monitoring of all subrecipients is performed by the CD staff assigned to the project. All budget revisions must have prior approval by IGD. All billings submitted are reviewed by CD staff and the Fiscal Division for accuracy. The Fiscal Division also verifies the existence and condition of CDBG/HOME purchased equipment.

HOME Compliance Monitoring

HOME monitoring is performed by HOME staff assigned to the project. HOME monitoring is concerned with the specifications established by the U.S. Department of Housing and Urban Development for housing development funds administered under the HOME Investment Partnership Program. These specifications apply for the “Affordability Period” determined by the amount of HOME funds invested per unit. In general, within the Affordability Period, HOME-funded rental property owners or managers are required to supply the HOME Monitor with annual Compliance Reports which include rents charged, annual Income Certification forms attesting to the income of each resident for that particular year, a sample lease, and a sample tenant application form. The HOME Monitor evaluates the information received to ensure that rents and incomes comply with HUD guidelines and that leases and applications do not contain prohibited language.

St. Clair County inspects HOME-assisted properties for property standards as follows:

- 1-4 unit properties are inspected every three years
- 5-25 unit properties are inspected every two years
- Properties with 25 or more units are inspected annually

Fair Housing Compliance Monitoring

St. Clair County contractually requires all housing development projects assisted with CDBG and HOME funds to provide documentation for and follow an affirmatively fair housing marketing plan for the housing units assisted.

Accessibility Compliance Monitoring

St. Clair County requires that any sites where services are provided with CDBG or HOME assistance or where the CDBG and HOME program are administered be accessible for people with disabilities. The plans for all housing development projects assisted with CDBG or HOME funds are reviewed by IGD for compliance with all applicable accessibility standards. Site visits are conducted throughout construction to verify that the construction is completed in accordance with approved plans.

Priority Needs Analysis and Strategies (91.215 (a))

1. Describe the basis for assigning the priority given to each category of priority needs.
2. Identify any obstacles to meeting underserved needs.

3-5 Year Strategic Plan Priority Needs Analysis and Strategies response:

1. The County considers many factors in assigning priorities for CDBG and HOME funding, including the knowledge of the County Board Chairman and the IGD Executive Director. Utilizing data from multiple sources, the input from the community received through our citizen participation process and input the local governments of towns and villages throughout the County, the County is able to assess need levels and weigh various options. The County strives to create a balance so that limited funds are able to have an impact across all sectors of the needs population.

Infrastructure improvements, particularly those related to water, sewer and flood drain improvements; are a high priority throughout the County, particularly in the bottom areas where drainage is particularly difficult. The County makes applications for the funding of public facilities and improvements available to all the communities in its consolidated plan service area. The applications are reviewed for CDBG funding eligibility and evaluated based on factors that include community need, past performance, and the percentage of low-moderate-income benefit that result from the proposed project.

Although our data shows that the percentage of renter households with one or more housing problems is greater than the percentage of owner households, and the percentage of renter households who are cost burdened is higher than the percentage of owner households; because there are more than twice as many owner households at all income levels compared to renter households (57,557 owner households compared to 26,103 renter households), we have far more owner households with housing problems at all income levels and more owner households who are cost burdened than renter households. Therefore, with our limited resources, we have assigned a high priority to provide assistance to very-low, low- and moderate-income homeowners to improve and maintain their homes and to provide homeownership assistance to income-eligible homebuyers.

The results of a countywide Housing and Special Needs Survey clearly indicated a need for transitional housing, single-family home rehabilitation, single-family home new construction, homebuyer assistance and lead-based paint hazard reduction as the priority housing needs over the next five years for very low, low- and moderate-income persons. Information received from Point-in-Time Counts indicates a need over the next five years for emergency shelter and permanent housing assistance, supportive services and transitional housing for homeless persons.

Because of some of the disproportionate impacts on the availability of affordable housing, fair housing counseling services are another high priority.

All eligible social service agencies throughout St. Clair County may seek assistance for any of the above mentioned programs. However, the feasibility of some programs and services may be contingent on future funding.

2. As previously addressed, the primary obstacle to meeting all of the identified needs, including those needs identified as a high priority, is the general lack of funding resources available to the public and private agencies who serve the needs of low- and moderate-income residents. The level of federal funding has declined while neither state nor local funds have been able to fill the gap, especially for non-housing needs. Between 2002 and 2008, the County's annual CDBG and HOME entitlement funds have been cut by 22% and 24% respectively. These cuts greatly affect our efforts to meet the needs identified in this consolidated plan. Local communities do not have the resources to address these needs adequately either. The needs are so great in these communities that HUD Entitlement funds alone, even leveraged with other resources are insufficient to reverse the decades of decline. Local governments have difficulty gaining approval to increase local taxes to make repairs or improvements to public facilities and infrastructure, let alone address affordable housing needs.

An obstacle to meeting the needs for low-moderate income households to become homeowners is that they are often inadequately prepared for it. The County continues to provide comprehensive housing counseling services at nominal cost to all successful participants in the St. Clair County Intergovernmental Grants Department Community Development Division's housing programs. But homebuyer assistance and affordable housing development programs are more difficult in the older, poorer, minority communities that border the City of East St. Louis, due to nearby blight, crime, weak economic bases, low-performing school districts and infrastructure needs that exceed available resources. In addition, the continued decline of the housing market has led developers to request even larger subsidies to make affordable housing development feasible.

Adequate funding is an obstacle to providing temporary, transitional and permanent housing for the homeless and sometimes community resistance can hamper the creation, location or expansion of agencies serving the near homeless, homeless and/or chronically homeless.

Vacant, derelict buildings are an obstacle to making suitable living environments available for low-moderate income households. They are public health and safety hazards that reduce property values, cause disinvestment to accelerate, and invite the nuisance behavior and criminal activity that make neighborhoods less desirable places in which to live.

And finally, local financial institutions are often unaware of the state and local programs that are available to businesses that locate in a tax increment financing district, a state enterprise zone or a rural area, which is an obstacle to the success of economic development programs.

Lead-based Paint (91.215 (g))

1. Estimate the number of housing units that contain lead-based paint hazards, as defined in section 1004 of the Residential Lead-Based Paint Hazard Reduction Act of 1992, and are occupied by extremely low-income, low-income, and moderate-income families.
2. Outline actions proposed or being taken to evaluate and reduce lead-based paint hazards and describe how lead based paint hazards will be integrated into housing policies and programs, and how the plan for the reduction of lead-based hazards is related to the extent of lead poisoning and hazards.

3-5 Year Strategic Plan Lead-based Paint response:

1. The Residential Lead-Based Paint Hazard Reduction Act of 1992 was passed to protect families from lead-based paint hazards. The term “lead-based paint hazard” is defined in Section 1004 as “any condition that causes exposure to lead from lead-contaminated dust, lead-contaminated soil, or lead-contaminated paint that is deteriorated or present in accessible surfaces, friction surfaces, or impact surfaces that would result in adverse human health effects as established by the appropriate Federal agency”.

Lead-based paint, especially the dust created when the paint decays, is one of the most common ways that people, especially children age six and under, are exposed to lead. The Federal Government banned the use of lead-based paint in housing in 1978. However, because the exact age of a building is sometimes unknown, and because it is possible that lead-based paint was still used sporadically in the years immediately following 1978, it is generally assumed that housing units built before 1980 have the potential for lead-based paint hazards.

The 2000 CHAS data, a special tabulation of Census data made available by HUD, has estimates of the number of households living in housing units built before 1980 - i.e., housing units that may contain lead-based paint hazards. The 2000 CHAS data also shows the number of those households that have children age six and under for three income levels. Young children, because they have a tendency to ingest lead-based paint dust, and because their bodies are still developing, are at the highest risk for lead poisoning. Adults are much less likely to develop lead poisoning, even if they are living in a housing unit built before 1980. The 2000 CHAS data for the St. Clair County, broken out by household income level and the presence of children age six and under, can be seen in Table 1 on the following page.

Table 2, also on the following page summarizes Table 1. It shows the number of lead-risk housing units, and the number of lead-risk housing units with children age six and under, regardless of income level. Although 59,434 housing units were built before 1980 and have a risk of lead-based paint, only 9,232 of these, or 11% of St. Clair County Participating Jurisdiction housing units, were built before 1980 and have children under six.

Table 1

Household Income Level	Presence of Children Age Six and Under	Lead Risk Housing Units (Built Before 1980)	Total Housing Units	Percent Lead Risk Housing Units
Less than or Equal to 30% AMI	Children Age Six and Under	1391	2005	69%
	No Children Age Six and Under	6944	8470	82%
	Total Households <= 30% AMI	8335	10475	80%
Between 30% and 50% AMI	Children Age Six and Under	1275	1820	70%
	No Children Age Six and Under	6332	8019	79%
	Total Households 30%-50% AMI	7607	9839	77%
Over 50% AMI	Children Age Six and Under	6566	11321	58%
	No Children Age Six and Under	36926	53658	69%
	Total Households >50% AMI	43492	64979	67%

Table 2

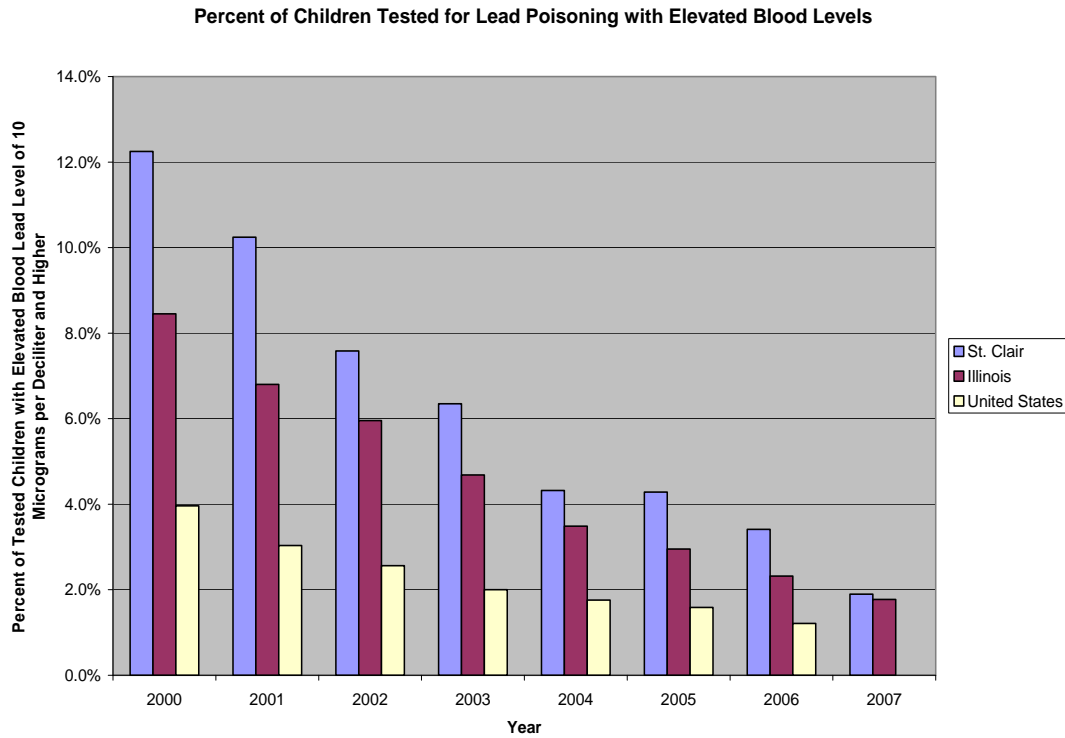
	Number of Units	Percent of Total Housing Units
Lead Risk Housing Units (All Income Levels)	59434	70%
Lead Risk Housing Units with Children Age Six and Under (All Income Levels)	9232	11%

- In the past, the St. Clair County Intergovernmental Grants Department has received lead abatement funding from HUD. However, currently St. Clair County does not have any lead abatement funding.

The Illinois Department of Public Health (IDPH) does screen children for lead poisoning throughout the state as part of an effort to eliminate elevated blood lead levels in children. Illinois law requires that children between 6 and 84 months of age who live in high risk areas be tested before attending a licensed day care, school or kindergarten. IDPH has prioritized early detection, since damage from lead poisoning can be minimized or prevented when it is discovered early in an affected child's development.

Figure 1 below shows the results of IDPH screenings since 2000. Over time, incidents of elevated blood levels have decreased in St. Clair County, and in 2007, St. Clair County's lead screening results are similar to the state's overall results.

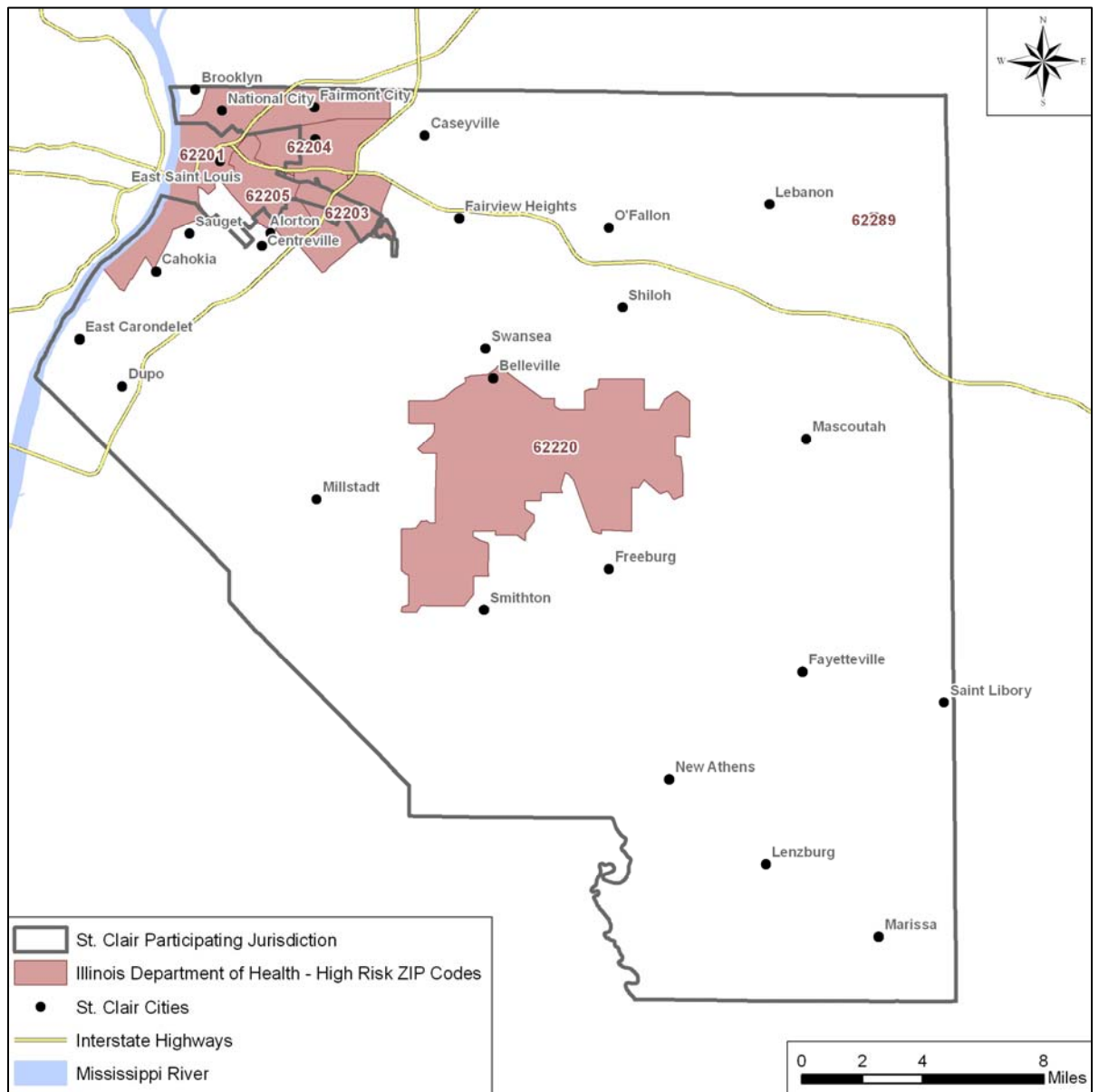
Note that, in Figure 1, "St. Clair" refers to the entire County, and not only the Participating Jurisdiction. Also note that United States data is not yet available for 2007.



IDPH has identified High Risk ZIP Codes for pediatric blood lead poisoning based on housing age and poverty rates. In High Risk ZIP Codes, IDPH recommends obtaining a blood lead test for all children at 12 and 24 months, and possibly earlier. In contrast, in Low Risk ZIP Codes, IDPH recommends administering a Childhood Lead Risk Assessment Questionnaire for all children at 12 and 24 months, and obtaining a blood lead test only when the Questionnaire indicates some risk. IDPH further recommends that all children in low-income families should be tested for elevated blood lead levels, even if they live in a Low Risk ZIP Code.

There are six High Risk ZIP Codes within St. Clair County: 62201, 62203, 62204, 62205, 62220, and 62289. However, several of these ZIP codes are only partially within the St. Clair County Participating Jurisdiction. The majority of St. Clair County Participating Jurisdiction ZIP Codes are classified as Low Risk ZIP Codes. The High Risk ZIP Codes can be seen in Map 1 on the following page.

Map 1



HOUSING

HOUSING

Housing Needs (91.205)

*Please also refer to the Housing Needs Table in the Needs.xls workbook

1. Describe the estimated housing needs projected for the next five year period for the following categories of persons: extremely low-income, low-income, moderate-income, and middle-income families, renters and owners, elderly persons, persons with disabilities, including persons with HIV/AIDS and their families, single persons, large families, public housing residents, victims of domestic violence, families on the public housing and section 8 tenant-based waiting list, and discuss specific housing problems, including: cost-burden, severe cost- burden, substandard housing, and overcrowding (especially large families).
2. To the extent that any racial or ethnic group has a disproportionately greater need for any income category in comparison to the needs of that category as a whole, the jurisdiction must complete an assessment of that specific need. For this purpose, disproportionately greater need exists when the percentage of persons in a category of need who are members of a particular racial or ethnic group is at least ten percentage points higher than the percentage of persons in the category as a whole.

3-5 Year Strategic Plan Housing Needs response:

1. The Department of Housing and Urban Development (HUD) defines low- to moderate-income (LMI) households as households with an income at or below 80% of the area median income. Within that category, there are three income levels as follows:
 - Extremely low-income households, which are households with an annual income at or below 30% of the area median income;
 - Low-income households, which are households with an annual income between 30% and 50% of the area median income; and
 - Moderate-income households, which are households with an annual income between 50% and 80% of the area median income

St. Clair County, Illinois										
FY 2010 Income Limit	Area Median Income	FY 2010 Income Limit Category	1 Person	2 Person	3 Person	4 Person	5 Person	6 Person	7 Person	8 Person
St. Clair County	68,300	Extremely Low (30%) Income Limits	\$14,350	\$16,400	\$18,450	\$20,500	\$22,150	\$23,800	\$25,450	\$27,100
		Very Low (50%) Income Limits	\$23,950	\$27,350	\$30,750	\$34,150	\$36,900	\$39,650	\$42,350	\$45,100
		Low (80%) Income Limits	\$38,300	\$43,750	\$49,200	\$54,650	\$59,050	\$63,400	\$67,800	\$72,150

As one might expect, housing cost burden is more of an issue for extremely low-income households in St. Clair County than it is for low-income households and it is more of an issue for low-income households than it is for moderate-income households. Also, in general, renter households in St. Clair County are more housing cost burdened (paying more than 30% of their household income for housing) than are homeowner households.

And finally, elderly households are the most cost burdened of all household types while small families have the lowest percentage of housing cost burden.

Housing Needs of Specific Household Categories **Extremely Low-Income Households (<30% of Median Income)**

The “extremely low-income” designation applies to those households whose incomes are at or below 30% of the area median income. The CHAS Data Book identifies 10,347 extremely low-income households in the St. Clair County Participating Jurisdiction (St. Clair County, excluding East St. Louis). Among these households, there are more renters (6,199) than homeowners (4,148).

- Approximately 77% of extremely low-income households have one or more housing problems, such as cost burden, overcrowding and/or incomplete kitchen or plumbing facilities. The primary housing problem for this group is cost burden.
- 75% of these households are cost burdened (paying more than 30% of their household income for housing).
- Approximately 53% are severely cost burdened (paying more than 50% of their household income for housing)

Extremely low-income households can be further identified by household type: elderly, small family, large family, and all others. Of the extremely low-income renters, 1,551 are elderly households, 2,262 are small families, 672 are large families, and 1,714 are in the “other” category.

Of the **extremely low-income elderly renter** households:

- 68% have one or more housing problems. But the cost burden for elderly renters is lower than it is for extremely low-income households overall.
- 67% are cost burdened.
- Almost 42% are severely cost burdened.

Of the **extremely low-income small family renter** households:

- 83% have one or more housing problems.
- 81% are cost burdened
- 61% are severely cost burdened.

Of the **extremely low-income large family renter** households:

- Almost 89% have one or more housing problems.
- 82% are cost burdened.
- 56% are severely cost burdened.

Of **all other extremely low-income renter** households:

- Almost 83% have one or more housing problems.
- Almost 83% are cost burdened.
- Almost 67% are severely cost burdened.

Of the extremely low-income homeowners, 2,081 are elderly households, 1,008 are small families, 334 are large families, and 725 are in the “other” category.

Of the **extremely low-income elderly homeowner** households:

- 68% have one or more housing problems. But again, the cost burden for elderly homeowners is lower than it is for extremely low-income households overall.
- Almost 68% are cost burdened.
- 34% are severely cost burdened.

Of the **extremely low-income small family homeowner** households:

- Almost 78% have one or more housing problems.
- 77% are cost burdened.
- 61% are severely cost burdened.

Of the **extremely low-income large family homeowner** households:

- 88% have one or more housing problems.
- 84% are cost burdened. **This is the highest percentage of cost burden of all extremely low-income households.**
- 69% are severely cost burdened. **This is the highest percentage of severe cost burden of all extremely low-income households.**

Of **all other extremely low-income homeowner** households:

- 67% have one or more housing problems. This group also has a cost burden that is lower than it is for extremely low-income households overall.
- 67% are cost burdened.
- 51% are severely cost burdened.

Low-Income Households (30-50% of Median Income)

The “low-income” designation applies to those households whose incomes are greater than 30%, but less than or equal to 50% of the area median income. The CHAS Data Book identifies 9,571 low-income households in St. Clair County. Unlike extremely low-income households, among low-income households, there are more homeowners (5,363) than renters (4,208).

- 49% of low-income households have some sort of housing problem, such as cost burden, overcrowding and/or incomplete kitchen or plumbing facilities. Cost burden is one of the primary housing problems for this group as well, but there is improvement in the cost burden data for low-income households when compared with data for extremely low-income households.
- Almost 47% are cost burdened.
- 11% are severely cost-burdened.

Low-income households can be further identified by household type: elderly, small family, large family, and all others. Of the low-income renters, 823 are elderly households, 1,640 are small families, 439 are large families and 1,306 are in the “other” category.

Of the **low-income elderly renter** households:

- 53% have one or more housing problems.
- 53% are cost burdened.
- 10% are severely cost burdened.

Of the **low-income small family renter** households:

- Almost 58% have one or more housing problems.
- 55% are cost burdened
- 6% are severely cost burdened.

Of the **low-income large family renter** households:

- 66% have one or more housing problems.
- Almost 36% are cost burdened
- 8% are severely cost burdened.

Of **all other low-income renter** households:

- 62% have one or more housing problems.
- 61% are cost burdened. **This is the highest percentage of cost burden of all low-income households.**
- 10% are severely cost burdened.

Of the low-income homeowners, 3,047 are elderly households, 1,269 are small families, 451 are large families, and 596 are in the “other” category.

Of the **low-income elderly homeowner** households:

- 30% have one or more housing problems. But again, the cost burden of low-income elderly homeowners is lower than it is for low-income households overall.
- 30% are cost burdened.
- Almost 10% are severely cost burdened.

Of the **low-income small family homeowner** households:

- Almost 56% have one or more housing problems.
- Almost 55% are cost burdened.
- 20% are severely cost burdened.

Of the **low-income large family homeowner** households:

- 64% have one or more housing problems.
- 51% are cost burdened.
- 11% are severely cost burdened.

Of **all other low-income homeowner** households:

- 54% have one or more housing problems.
- 54% are cost burdened.
- 24% are severely cost burdened. **This is the highest percentage of severe cost burden of all low-income households.**

Moderate-Income Households (50-80% of Median Income)

The “moderate-income” designation applies to those households whose incomes are greater than 50%, but less than or equal to 80% of the area median income. The CHAS Data Book identifies 16,923 moderate-income households in St. Clair County. Among these households, there are again more homeowners (10,684) than renters (6,239). The homeownership rate among moderate income households is 63%, compared to 56% for low-income households and 40% for extremely low-income households.

- 23% of moderate-income households have some sort of housing problem, such as cost burden, overcrowding and/or incomplete kitchen or plumbing facilities, compared to 49% of low-income households and almost 77% of extremely low-income households.
- 20% are cost burdened.
- 3.6% are severely cost burdened.

Moderate-income households can be further identified by household type: elderly, small family, large family, and all others. Of the moderate-income renters, 674 are elderly households, 2,616 are small families, 579 are large

families, and 2,370 are in the “other” category. Just as there is significant improvement in the cost burden data between low-income and extremely low-income households, there is significant improvement in the cost burden data for moderate-income households when compared with data for low-income households.

Of the **moderate-income elderly renter** households:

- 27% have one or more housing problems.
- 27% are cost burdened.
- 7% are severely cost burdened. **This is the highest percentage of severe cost burden of all moderate-income households.**

Of the **moderate-income small family renter** households:

- 17% have one or more housing problems.
- 13% are cost burdened.
- 1% are severely cost burdened.

Of the **moderate-income large family renter** households:

- 23% have one or more housing problems.
- Less than 2% are cost burdened.
- 0% are severely cost burdened.

Of **all other moderate-income renter** households:

- 16% have one or more housing problems.
- 14% are cost burdened.
- 1% are severely cost burdened.

Of the moderate-income homeowners, 4,273 are elderly households, 3,834 are small families, 1,035 are large families, and 1,542 are in the “other” category.

Of the **moderate-income elderly homeowner** households:

- Almost 14% have one or more housing problems.
- Almost 13% are cost burdened.
- Almost 3% are severely cost burdened.

Of the **moderate-income small family homeowner** households:

- 32% have one or more housing problems.
- 31% are cost burdened.
- 6% are severely cost burdened.

Of the **moderate-income large family homeowner** households:

- 40% have one or more housing problems.
- Almost 27% are cost burdened.
- 6% are severely cost-burdened.

Of **all other moderate-income homeowner** households:

- 35% have one or more housing problems.
- 34% are cost burdened. **This is the highest percentage of cost burden of all moderate-income households.**
- 5% are severely cost burdened.

Middle Income Households

The “middle-income” designation applies to those households whose incomes are greater than 80%, but less than or equal to 95% of the County median income. The CHAS Data Book does not provide data for middle-income households; however, it does include information for all households with incomes greater than 80% of the County median income. Using the data for households with incomes greater than 80% of the County median income, there are 46,839 middle income households in St. Clair County, consisting of 9,457 renters and 37,382 homeowners. 6.2% of middle-income households have some sort of housing problem, such as cost burden, overcrowding and/or incomplete kitchen or plumbing facilities. Approximately 4.8% of these households are cost burdened and 0.5% are severely cost burdened.

Renter Households

The CHAS Data Book identifies 26,103 renter households at all income levels. Of these households:

- 35% have one or more housing problems.
- 31% are cost burdened.
- 16% are severely cost burdened.

Owner Households

The CHAS Data Book identifies 57,577 owner households at all income levels. Of these households:

- 18% have one or more housing problems.
- 17% are cost burdened.
- 6% are severely cost burdened.

Elderly Persons

The “elderly person” designation applies to one- or two-person households where one or both persons are 62 years or older. The CHAS Data Book identifies 19,954 elderly households at all income levels, 3,787 of which are renters and 16,167 of which are owners. Of these households:

- 47% of renters and 20% of owners have one or more housing problems.
- 46% of renters and 19% of owners are cost burdened.
- 22% of renters and 7% of owners are severely cost burdened.

Single Persons

The CHAS Data Book does not provide housing needs data for single-person households; however, the 2008 American Community Survey identifies approximately 29,724 single person households in St. Clair County. This number includes 13,835 renter households and 15,889 owner households.

Large Families

The “large family” designation applies to those households comprised of five or more related members. The CHAS Data Book identifies 8,181 large family households at all income levels, 2,417 of which are renters and 5,764 of which are owners. Of these households:

- 47% of renters and 26% of owners have one or more housing problems.
- 30% of renters and 17% of owners are cost burdened.
- 17% of renters and 6% of owners are severely cost burdened.

The table on the following page (consistent with HUD Table 2A) provides estimates of the housing needs among low-income and moderate-income families in the St. Clair County Participating Jurisdiction. The information presented is based primarily on data from HUD’s Comprehensive Housing Affordability Strategy (CHAS) estimates. The table documents how many households are facing cost burdens (housing costs which exceed 30% of household income) and severe cost burdens (housing costs which exceed 50% of household income). Many of the households identified as having housing problems that do not face cost burdens are subject to overcrowding or substandard conditions. In the table, the phrase “**Any Housing Problems**” refers to households with a cost burden greater than 30% of income **and/or** living in overcrowded housing units **and/or** living in housing units without complete kitchen or plumbing facilities.

Housing Problems Output for -All Households

Name of Jurisdiction: St Clair County(CDBG), Illinois	Source of Data: CHAS Data Book					Data Current as of: 2000					
	Renters					Owners					
Household by Type, Income, & Housing Problem	Elderly 1 & 2 member households	Small Related (2 to 4)	Large Related (5 or more)	All Other Households	Total Renters	Elderly 1 & 2 member households	Small Related (2 to 4)	Large Related (5 or more)	All Other Households	Total Owners	Total Households
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(L)
1. Household Income <=50% MFI	2,374	3,902	1,111	3,020	10,407	5,128	2,277	785	1,321	9,511	19,918
2. Household Income <=30% MFI	1,551	2,262	672	1,714	6,199	2,081	1,008	334	725	4,148	10,347
3. % with any housing problems	67.9	83.3	88.7	82.8	79.9	68	77.6	88	66.8	71.7	76.6
4. % Cost Burden >30%	67.2	81.1	81.8	82.6	78.1	67.6	77.2	83.8	66.8	71.1	75.3
5. % Cost Burden >50%	41.6	60.6	56.3	66.9	57.1	33.6	60.8	68.9	51.4	46.2	52.7
6. Household Income >30% to <=50% MFI	823	1,640	439	1,306	4,208	3,047	1,269	451	596	5,363	9,571
7. % with any housing problems	52.7	57.6	66.1	62.2	58.9	30.3	56.1	64.1	54.4	41.9	49.4
8. % Cost Burden >30%	52.7	54.8	35.5	61.1	54.3	30.2	54.7	50.8	54.4	40.4	46.5
9. % Cost Burden >50%	10.3	5.8	8.4	10.3	8.4	9.5	20.3	10.6	24.2	13.8	11.4
10. Household Income >50 to <=80% MFI	674	2,616	579	2,370	6,239	4,273	3,834	1,035	1,542	10,684	16,923
11. % with any housing problems	26.9	17.5	23	16.2	18.5	13.5	31.7	39.9	34.8	25.6	23
12. Cost Burden >30%	26.9	13	1.7	14.3	14	12.6	30.9	26.5	33.9	23.6	20
13. % Cost Burden >50%	7.3	1.1	0	1.3	1.7	2.8	6.3	5.9	4.9	4.6	3.6
14. Household Income >80% MFI	739	5,007	727	2,984	9,457	6,766	22,618	3,944	4,054	37,382	46,839
15. % with any housing problems	12.7	3.1	14.4	2.6	4.6	4	5.4	12.4	12.3	6.7	6.2
16. Cost Burden >30%	11.4	1	0	1.3	1.8	3.9	5	5.1	11.7	5.5	4.8
17. % Cost Burden >50%	5.4	0	0	0	0.4	0.5	0.4	0.1	1.9	0.6	0.5
18. Total Households	3,787	11,525	2,417	8,374	26,103	16,167	28,729	5,764	6,917	57,577	83,680
19. % with any housing problems	46.5	29.9	46.5	32.2	34.6	19.7	13.7	25.8	26.6	18.2	23.3
20. % Cost Burden >30	46	27.1	29.6	31	31.3	19.4	13.1	17.1	26.1	16.8	21.4
21. % Cost Burden >50	21.6	13	17.2	15.7	15.5	7.1	4.2	6	9.7	5.8	8.8

Persons with Disabilities

The 2008 American Community Survey identifies approximately 33,584 individuals in St. Clair County with a disability, including 3,641 who are individuals under 18 year of age, 17,442 individuals between 18 and 64, and 12,501 individuals who are 65 or older.

Persons with HIV/AIDS and their Families

The tables below show data from the Illinois Department of Public Health on the total number of persons with HIV or AIDS for the years 2006 through 2009. The East Side Health District serves the residents of Canteen Township, Centreville Township, East St. Louis Township and Stites Township. The St. Clair County Health Department reports HIV and AIDS cases for the remainder of the County. The total number of persons, the sum of all persons reported by the East Side Health District and the St. Clair County Health Department, covers St. Clair County in its entirety (including East St. Louis).

In 2009, there were a total of 268 persons with HIV and 274 persons with AIDS in St. Clair County. Not all persons with HIV/AIDS and their families necessarily have housing needs. Because approximately 23% of all households in the St. Clair County Participating Jurisdiction have one or more housing problems, we can assume that at least 23% of the 542 HIV/AIDS persons, or 125 persons, have one or more housing problems. Furthermore, the total number of persons with HIV or AIDS has increased slightly since 2006, so the demand for housing for HIV/AIDS and their families is likely to continue to increase over time.

HIV Cases

	2006	2007	2008	2009
East Side Health District	185	188	192	163
St. Clair County Health Department	97	106	115	105
St. Clair County Total	282	294	307	268

AIDS Cases

	2006	2007	2008	2009
East Side Health District	142	161	173	173
St. Clair County Health Department	76	80	87	101
St. Clair County Total	218	241	260	274

Families on the Public Housing and Section 8 Tenant-Based Waiting List

The St. Clair County Housing Authority (SCCHA) currently has 1,064 public housing units and administers 1,575 Section 8 Housing Choice Vouchers.

SCCHA's waiting list is a pool of applicants who have a need and demand for units by location. As of June 2010 there were 13,202 applicants on the public housing waiting list and 5,506 applicants on the Section 8 Housing Choice Voucher Program waiting list.

The waiting lists for public housing and Section 8 Housing Choice Voucher Program (HCVP) grew at a rapid rate from June 2009 to June 2010 as shown below:

	Active Applications on File			
	June 2009	June 2010	Difference	Percentage
Public Housing*	9,949	13,202	+3,253	+32%
Section 8 HCVP**	3,602	5,506	+1,454	+40%

*Consolidated wait list totals. SCCHA maintains 18 separate public housing wait lists. Applicants that apply for more than one location would be counted once for each location for which they apply.

**Unduplicated count.

The dramatic increase in applications for federal housing assistance is reflective of the bad economic conditions. Application for housing assistance is directly correlated to economic conditions. If the local economy improves the number of applications is expected to decline in future years. The reverse is also true.

The vast majority of applicants for both wait lists have incomes in the extremely low category (at or below 30% of county median) as shown on the following page:

	Applicant Household Breakdown by Income Category		
	Extremely Low Income	Very Low Income	Low Income
Public Housing	90%	8%	2%
Section 8 HCVF	89%	10%	1%

**Housing Needs by Specific Housing Problems
Cost Burden and Severe Cost Burden**

The cost of housing is measured by cost burden – the percentage of a household’s income needed to cover housing expenses (rent plus utilities for renters, or mortgage payments, taxes, insurance and utilities for owners). Paying over 30% of a household’s income on housing expenses is considered a cost burden, while paying more than 50% is considered a severe cost burden.

Households with a housing cost burden may be going without adequate food, health care and other necessities in order to pay for housing.

Substandard Housing Conditions

“Substandard” housing units are defined in the CHAS data, and therefore in this Consolidated Plan, as housing units without complete kitchen or plumbing facilities. In St. Clair County (including East St. Louis), according to the 2008 American Community Survey, approximately 1.9% of housing units and approximately 0.3% of occupied housing units lack complete plumbing facilities. Approximately 2.9% of housing units and approximately 1.0% of occupied housing units lack complete kitchen facilities. However, it is important to note that some housing units with complete kitchen and plumbing facilities may still require substantial rehabilitation or home repair efforts in order to ensure that they are decent, safe and sanitary homes.

Overcrowding

Overcrowding is generally tied to a family’s income; the greater the household income, the more opportunities the household has to obtain housing appropriate to the family’s size. Appropriate housing refers to a household residing in a housing unit that provides sufficient space for the number of occupants, without exceeding unit capacity. HUD defines overcrowding as more than one person per room. By this definition, rental housing tends to be more overcrowded than owner-occupied housing.

- 2 A racial or ethnic group is defined as having a disproportionately greater need if the percentage of persons in a category of need who are members of the particular racial or ethnic group is at least ten percentage points higher than the percentage of persons in the category of need as a whole. The table below shows data for St. Clair County from HUD’s Comprehensive Housing Affordability Strategy (CHAS) for the population as a whole, broken down by income category. The final column presents the thresholds over which minority groups would be identified as having a disproportionate housing need relative to the population as a whole.

Housing Needs: Total Population

Median Family Income	Total Households	Percent of Households with Any Housing Problem	Disproportionate Need Threshold
<30% MFI	10,347	76.6%	86.6%
30.01—50% MFI	9,571	49.4%	59.4%
50.01—80% MFI	16,923	23.0%	33.0%
>80.01% MFI	46,839	6.2%	16.2%

The following tables present CHAS housing needs data for ethnic and racial groups in St. Clair County.

Housing Needs: Black Non-Hispanic Households

Median Family Income	Total Black Non-Hispanic Households	Percent of Black Non-Hispanic Households with Any Housing Problem	Disproportionate Need Threshold Exceeded?
<30% MFI	4,238	79.5%	NO
30.01—50% MFI	1,939	67.3%	YES
50.01—80% MFI	2,793	26.4%	NO
>80.01% MFI	5,019	8.6%	NO

Housing Needs: Hispanic Households

Median Family Income	Total Hispanic Households	Percent of Hispanic Households with Any Housing Problem	Disproportionate Need Threshold Exceeded?
<30% MFI	193	80.8%	NO
30.01—50% MFI	192	54.7%	NO
50.01—80% MFI	292	42.8%	YES
>80.01% MFI	677	9.5%	NO

Housing Needs: Asian Non-Hispanic Households

Median Family Income	Total Asian Non-Hispanic Households	Percent of Asian Non-Hispanic Households with Any Housing Problem	Disproportionate Need Threshold Exceeded?
<30% MFI	58	75.9%	NO
30.01—50% MFI	71	94.4%	YES
50.01—80% MFI	90	46.7%	YES
>80.01% MFI	307	24.1%	YES

Housing Needs: Native American Non-Hispanic Households

Median Family Income	Total Asian Non-Hispanic Households	Percent of Asian Non-Hispanic Households with Any Housing Problem	Disproportionate Need Threshold Exceeded?
<30% MFI	0	N/A	N/A
30.01—50% MFI	24	83.3%	YES
50.01—80% MFI	44	9.1%	NO
>80.01% MFI	115	0%	NO

Housing Needs: Pacific Islander Non-Hispanic Households

Median Family Income	Total Asian Non-Hispanic Households	Percent of Asian Non-Hispanic Households with Any Housing Problem	Disproportionate Need Threshold Exceeded?
<30% MFI	10	0%	NO
30.01—50% MFI	0	N/A	N/A
50.01—80% MFI	4	0%	NO
>80.01% MFI	10	0%	NO

According to the above tables, Asian households have a disproportionate housing need relative to the Participating Jurisdiction’s population as a whole with comparable household incomes.

St. Clair County will continue to communicate with existing organizations that work with Asian households, with a goal of reducing housing affordability disparities in future years. The County will also continue to support the production of affordable housing, with the knowledge that the more quality, affordable housing made available to the community, the more the entire population, including Asian households, will benefit.

Besides Hispanic households, other ethnic and racial groups have disproportionate needs at certain income levels. Black and Native American very low income households have a disproportionate need relative to very low income households in the St. Clair County Participating Jurisdiction as a whole, and Hispanic low income households have a disproportionate need relative to low income households overall. St. Clair County will continue to reach out to existing organizations working with Black, Native American, and Hispanic households and continue to produce quality, affordable housing available to all ethnic and racial groups.

The County will also re-evaluate disproportionate housing needs after the 2010 Census and 2010 CHAS data are released, as the 2000 CHAS data may no longer accurately reflect the housing burdens of various racial and ethnic groups.

Priority Housing Needs (91.215 (b))

1. Identify the priority housing needs and activities in accordance with the categories specified in the Housing Needs Table (formerly Table 2A). These categories correspond with special tabulations of U.S. census data provided by HUD for the preparation of the Consolidated Plan.
2. Provide an analysis of how the characteristics of the housing market and the severity of housing problems and needs of each category of residents provided the basis for determining the relative priority of each priority housing need category.

Note: Family and income types may be grouped in the case of closely related categories of residents where the analysis would apply to more than one family or income type.

3. Describe the basis for assigning the priority given to each category of priority needs.
4. Identify any obstacles to meeting underserved needs.

3-5 Year Strategic Plan Priority Housing Needs response:

1. St. Clair County's priority housing needs are to address the housing problems and cost burdens of very-low, low- and moderate income homeowners of all household types (elderly, small related and large related).

Through its CDBG and HOME programs, the County will offer grants and loans to homeowners to make repairs to bring homes up to St. Clair County Housing Maintenance Standards. These programs will help stabilize the aging housing stock by reducing barriers to available housing, reducing blight and promoting neighborhood revitalization. In addition to assisting homeowners in dealing with the difficulties involved in maintaining older homes, elderly and disabled residents will be able to utilize the program to address accessibility issues. The programs will be offered to income-eligible property owners and will have more relaxed credit standards than are typically used by traditional lenders.

The County's HOME program will also offer loans and grants directly to homebuyers to help with closing costs and down payments. In this program, lending institutions are encouraged to provide financing to potential homebuyers. The County requires that extremely low-, low- and moderate-income homebuyers receive approved homebuyer counseling services to participate in its homeowner assistance program. The County will continue to utilize both existing nonprofit organizations and new groups to provide additional counseling services for budgeting, home purchase and maintenance, as well as fair housing counseling. The County has, and will continue, to make a concerted effort to market this assistance to low-moderate income and Section 8 clients.

A focus of the County's ongoing efforts is the American Bottoms area, which is an historically racially and economically impacted area. Despite very liberal terms, it has been difficult to qualify prospects in the American Bottoms area for home purchases. The Metro-East Lending Group was formed to increase the availability of financing in this area. Another group, the Metro East Mortgage Review Board, was formed in an effort to collaboratively provide a review process for a borrower who has previously been turned down for a mortgage loan. This group consists of eight lending institutions and is one of only three throughout the entire nation.

2. The 2000 Census reported 96,810 households in St. Clair County. Approximately 25% (24,396) of these reported housing problems, including 819 that lack complete plumbing facilities and 1,065 that lack complete kitchen facilities. The 2000 census reported 36,358 persons with incomes below the poverty level. Twenty-two percent (15,253) of all children under 18 in a family household and 10% (3,098) of persons 65 years and over live in poverty.

The CHAS Data Book identifies 10,347 extremely low-income households in the St. Clair County Participating Jurisdiction (St. Clair County, excluding East St. Louis). Among these households, there are more renters (6,199) than homeowners (4,148).

- Approximately 77% of extremely low-income households have one or more housing problems, such as cost burden, overcrowding and/or incomplete kitchen or plumbing facilities. The primary housing problem for this group is cost burden.
- 75% of these households are cost burdened (paying more than 30% of their household income for housing).
- Approximately 53% are severely cost burdened (paying more than 50% of their household income for housing)

The CHAS Data Book identifies 9,571 low-income households in St. Clair County. Unlike extremely low-income households, among low-income households, there are more homeowners (5,363) than renters (4,208).

- 49% of low-income households have some sort of housing problem, such as cost burden, overcrowding and/or incomplete kitchen or plumbing facilities. Cost burden is one of the primary housing problems for this group as well, but there is improvement in the cost burden data for low-income households when compared with data for extremely low-income households.
- Almost 47% are cost burdened.
- 11% are severely cost-burdened.

The CHAS Data Book identifies 16,923 moderate-income households in St. Clair County. Among these households, there are again more homeowners (10,684) than renters (6,239). The homeownership rate among moderate income households is 63%, compared to 56% for low-income households and 40% for extremely low-income households.

- 23% of moderate-income households have some sort of housing problem, such as cost burden, overcrowding and/or incomplete kitchen or plumbing facilities, compared to 49% of low-income households and almost 77% of extremely low-income households.
- 20% are cost burdened.
- 3.6% are severely cost burdened.

The CHAS Data Book identifies 26,103 renter households at all income levels. Of these households:

- 35% have one or more housing problems.
- 31% are cost burdened.
- 16% are severely cost burdened.

The CHAS Data Book identifies 57,577 owner households at all income levels. Of these households:

- 18% have one or more housing problems.
- 17% are cost burdened.
- 6% are severely cost burdened.

The St. Clair County Housing Authority (SCCHA) currently has 1,064 public housing units and 1,575 Section 8 Housing Choice Vouchers. There are 13,202 pending applications on the public housing waiting list, which includes duplicates because applicants that apply for more than one location are counted once for each location for which they apply. The current waiting list for Section 8 Housing Choice Vouchers is 5,506 households, which is an unduplicated count.

3. Among the 10,347 extremely low-income households, 60%, or 6,199, are renters whereas just 40%, or 4,148, are homeowners. Extremely low-income renter households have higher numbers and somewhat higher percentages of housing problems and, in particular, higher percentages of high housing cost burdens compared to extremely low-income owner households:

	Extremely Low-Income Renters					
	Elderly	Small Family	Large Family	All Other	Total	
Total households	1,551	2,262	672	1,714	6,199	
One or more housing problems	1,053	1,885	596	1,419	4,953	80%
Cost burdened	1,043	1,835	550	1,415	4,893	79%
Severely cost burdened	645	1,370	378	1,147	3,540	57%

	Extremely Low-Income Homeowners					
	Elderly	Small Family	Large Family	All Other	Total	
Total households	2,081	1,008	334	725	4,148	
One or more housing problems	1,416	782	294	484	2,976	72%
Cost burdened	1,406	778	280	484	2,948	71%
Severely cost burdened	700	613	230	373	1,916	46%

The St. Clair County Housing Authority’s (SCCHA) public housing and Section 8 housing choice voucher programs are best fitted to address the needs of extremely low-income renters and they will be a high priority for those programs. St. Clair County’s CDBG and HOME programs will give high priority to addressing the needs of the extremely low-income homeowners.

Among the 9,571 low-income households in the County, unlike extremely low-income households, more of them are homeowners than renters. Fifty-six percent, or 5,363, are homeowners, whereas 44%, or 4,208, are renters. Low-income renter households have somewhat higher percentages, but nearly the same numbers, of housing problems as low-income owner households, but low-income owner households have both a significantly higher number and a significantly higher percentage of severe housing cost burdens than low-income renter households do:

	Low-Income Renters					
	Elderly	Small Family	Large Family	All Other	Total	
Total households	823	1,640	439	1,306	4,208	
One or more housing problems	434	944	290	812	2,480	59%
Cost burdened	434	898	156	798	2,286	54%
Severely cost burdened	85	95	37	135	352	8%

	Low-Income Homeowners					
	Elderly	Small Family	Large Family	All Other	Total	
Total households	3,047	1,269	451	596	5,363	
One or more housing problems	924	712	289	324	2,249	42%
Cost burdened	920	694	229	324	2,167	40%
Severely cost burdened	290	257	48	144	739	14%

Assistance for low-income renters will continue to be a moderate priority for the SCCHA public housing and Section 8 housing choice voucher programs while the County's CDBG and HOME programs will give high priority to addressing the needs of low-income homeowners.

Among the 16,873 moderate-income households, more of them are homeowners than renters. Sixty-three percent, or 10,684, are homeowners, whereas 37%, or 6,289, are renters. Moderate-income owner households have significantly higher numbers and significantly higher percentages of housing problems and cost burdens than moderate-income renter households do:

	Moderate-Income Renters					
	Elderly	Small Family	Large Family	All Other	Total	
Total households	674	2,616	579	2,370	6,289	
One or more housing problems	181	457	133	385	1,156	18%
Cost burdened	181	340	10	340	871	14%
Severely cost burdened	49	28	0	30	107	2%

	Moderate-Income Homeowners					
	Elderly	Small Family	Large Family	All Other	Total	
Total households	4,273	3,834	1,035	1,542	10,684	
One or more housing problems	575	1,214	413	536	2,738	26%
Cost burdened	539	1,184	274	522	2,519	24%
Severely cost burdened	118	241	61	75	495	5%

Due to their relatively low numbers and their low percentage of housing problems, providing assistance to moderate-income renter households will be a low priority for St. Clair County. However, due to their large numbers, assistance to moderate-income owner households with housing problems will continue to be a high priority for the County.

- The primary obstacle to meeting priority housing needs is the general lack of funding resources available to the public and private agencies who serve the needs of low- and moderate-income residents. The level of federal funding has declined while neither state nor local funds have been able to fill the gap. Between 2002 and 2008, the County's annual CDBG and HOME entitlement funds have been cut by 22% and 24% respectively. These cuts greatly affect our efforts to meet the priority housing needs. Local communities do not have the resources to address these needs adequately either. Local governments

have difficulty gaining approval to increase local taxes to make repairs or improvements to public facilities and infrastructure, let alone address affordable housing needs.

An obstacle to meeting the needs for low-moderate income households to become homeowners is that they are often inadequately prepared for it. The County continues to provide comprehensive housing counseling services at nominal cost to all successful participants in the St. Clair County Intergovernmental Grants Department Community Development Division's housing programs. But homebuyer assistance and affordable housing development programs are more difficult in the older, poorer, minority communities that border the City of East St. Louis, due to nearby blight, crime, weak economic bases, low-performing school districts and infrastructure needs that exceed available resources. In addition, the continued decline of the housing market has led developers to request even larger subsidies to make affordable housing development feasible.

Adequate funding is an obstacle to providing temporary, transitional and permanent housing for the homeless and sometimes community resistance can hamper the creation, location or expansion of agencies serving the near homeless, homeless and/or chronically homeless.

Housing Market Analysis (91.210)

*Please also refer to the Housing Market Analysis Table in the Needs.xls workbook

1. Based on information available to the jurisdiction, describe the significant characteristics of the housing market in terms of supply, demand, condition, and the cost of housing; the housing stock available to serve persons with disabilities; and to serve persons with HIV/AIDS and their families. Data on the housing market should include, to the extent information is available, an estimate of the number of vacant or abandoned buildings and whether units in these buildings are suitable for rehabilitation.
2. Describe the number and targeting (income level and type of household served) of units currently assisted by local, state, or federally funded programs, and an assessment of whether any such units are expected to be lost from the assisted housing inventory for any reason, (i.e. expiration of Section 8 contracts).
3. Indicate how the characteristics of the housing market will influence the use of funds made available for rental assistance, production of new units, rehabilitation of old units, or acquisition of existing units. Please note, the goal of affordable housing is not met by beds in nursing homes.

3-5 Year Strategic Plan Housing Market Analysis responses:

1. The 2000 Census reported a total of 104,446 housing units in St. Clair County. A total of 96,810 are occupied (67% by owners, 33% by renters). Home prices vary greatly. Prices for new houses have driven up prices for existing homes in the strongest markets (Fairview Heights, O'Fallon, Shiloh, and Swansea). Market strength is the result of military employment (expected to increase), the

quality of school systems, easy access to shopping, and access to the interstate highways.

The weakest markets are in the American Bottoms, where many residences have little, if any residual value. Most pockets of blight are found there.

Some of the rural towns have little growth and only limited real estate activity, although growth has recently extended even to some of them.

Renters now occupy many formerly owner-occupied homes in the American Bottoms communities. There appears to be an adequate supply of single-family rental units as a result of the population shift away from these communities. Rents for these units appear to be remaining stable. This has contributed to few residential multiple-unit rental buildings being constructed in the County in recent years. Because of the excess of single-unit low-income units, rents are not rising fast enough to keep pace with increasing maintenance expenses.

Closer scrutiny of applicants by real estate management companies has resulted in longer periods of vacancy, especially in multiple-unit facilities, but the net effect has been less property damage and better collection rates.

About 7,905 mobile homes are dispersed throughout the County. They vary widely in condition from rental parks with deplorable site and structural conditions to attractive parks, catering to retirees, with quality streets and landscaping. The County has enacted a law that no mobile homes may be sited anywhere other than an existing mobile home community.

Housing rehabilitation is a problem for most low-income households who usually have very little funds available to do the necessary maintenance. 23,344 households, representing 36,358 people in St. Clair County were reported to be living in poverty in 2000. Of the very low-income households in the County, slightly more than 45% own their homes. Among those with the lowest incomes (0% to 30% MFI), almost 72% of households experienced some housing problem and a cost burden of over 30% of income. Of owners in the 50-80% MFI range, 19% reported housing problems and cost burdens in excess of 30%. 4% of elderly owners and 11% of non-elderly owners reported housing problems and cost burdens of over 30%. Financial assistance for housing improvement is needed for these groups of homeowners.

Potential low- and moderate-income homebuyers need some relaxation of the stringent credit, income, and down payment requirements. However, despite permissive underwriting, it has been difficult to secure approval for very low- to moderate-income applicants for new housing. That is because this group tends to have a poor credit history and insufficient funds for a down payment. This highlights the need for credit and housing counseling. The need for counseling and additional County programs is especially evident in the American Bottoms area, where there has been a large increase in bankruptcies and foreclosures, many due to predatory lending practices that have plagued poor communities.

Research also shows the possible need for multiple-unit rental housing for seniors.

In every part of the County housing costs will continue to consume a larger portion of the budget for poorer residents. The 2000 Census shows 15% of the population has household incomes below the poverty level. (mostly minority, elderly, and single female heads of households). If trends persist, increases in housing costs will have the strongest impact on those residents.

2. *A Picture of Subsidized Households* is a dataset and report released by HUD that describes the characteristics of assisted housing units and residents for the year 2008. On the following page is a table with information on St. Clair County assisted housing units and households. The numbers in the table include households living in East St. Louis, even though East St. Louis is its own Participating Jurisdiction, because of the difficulty of precisely tracking households with tenant-based Section 8 Vouchers.

Program Type	Total Units/ Households	Percent Occupied	Average Household Income	Percent Extremely Low Income	Percent Very Low Income
Public Housing	2,964	91%	\$10,600	82%	96%
Section 8 Vouchers	2,195	N/A	\$13,000	77%	98%
Section 8 NC/SR	549	85%	\$11,400	78%	98%
Section 236	304	94%	\$10,800	84%	97%
Other HUD-Assisted Multifamily	352	94%	\$11,600	77%	99%
LIHTC Developments	386	86%	N/A	N/A	N/A

As shown in the table, there are 6,750 housing units either set aside as affordable rental housing OR currently being occupied by a household with a tenant-based Section 8 Voucher. Note that very little is known about families living in LIHTC developments because the reporting requirements differ from the other programs. However, due to the nature of LIHTC program requirements, and due to the fact that tax credits are only available on affordable units, it is likely that most of the LIHTC units are affordable to households making 60% of the Area Median Income or less. It is clear from the above table that subsidized rental housing in St. Clair County is targeted to Very Low and Extremely Low income households.

The *Picture of Subsidized Households* data does not include information on HOME and CDBG-assisted affordable housing units, unless those units also include any of the subsidies listed above. The St. Clair Intergovernmental Grants Department has used HOME, CDBG, and ARRA NSP-I funding to produce new and rehabilitated for-sale housing units targeted to low income households. The County's HOME program also offers loans and grants directly to homebuyers to help with closing costs and down payments. In this program, lending institutions are encouraged to provide financing to potential homebuyers. The County requires that extremely low-, low- and moderate-income homebuyers receive approved homebuyer counseling services to participate in its homeowner assistance program.

HUD has created the *Multifamily Assistance and Section 8 Contracts Database* to provide HUD partners with a way of measuring the potential impact of expiring project-based subsidy contracts in their communities. The database represents the most comprehensive picture of project-based subsidies yet

developed, although there is no guarantee that the database is complete or all inclusive. The database is updated regularly. On the following page is a list assisted housing developments in the St. Clair County Participating Jurisdiction with contracts expiring during the timeframe covered by this consolidated plan (2010-2014).

Property Name	Address	City	Number of Units	Overall Contract Expiration Date
Eaton/Wilford Manor	3911 State St.	Belleville	24	7/29/2010
Townhouse Court	115-129 N. 6 th St.	Brooklyn	8	8/19/2010
Touchette Elderly Apts.	5900 Bond Ave.	Centreville	74	8/25/2010
Westfield Manor	7245 Westfield Plaza	Belleville	62	11/16/2010
Gwendolene Courts	544 North 41 st St.	Belleville	14	3/26/2011
Carriage House Place	115 East B St.	Belleville	30	12/21/2011
Brede Manor	809 N. Charles	Belleville	8	11/30/2012
Cedars of Lebanon	600 S. Horner St.	Lebanon	119	3/9/2010
O'Fallon Apts.	750 Weber Rd.	O'Fallon	132	6/30/2013
Touchette Elderly Apts. Phase II	5900 Bond Ave.	Centreville	49	10/6/2013
Chevy Chase Apts.	208 Estate Dr.	O'Fallon	52	8/31/2014

A total of 572 units have the potential to be lost from the assisted housing inventory due to expiring contracts between 2010 and 2014. However, due to a depressed housing market and sluggish economy, it is likely that many of these units will remain affordable to low and moderate income households, despite the lack of an enforceable contract. IGD will monitor the status of these developments, and, where appropriate, work with the property owners to explore options for keeping units affordable.

- Among the 10,347 extremely low-income households, 60%, or 6,199, are renters whereas just 40%, or 4,148, are homeowners. Extremely low-income renter households have higher numbers and somewhat higher percentages of housing problems and, in particular, higher percentages of high housing cost burdens compared to extremely low-income owner households:

	Extremely Low-Income Renters					
	Elderly	Small Family	Large Family	All Other	Total	
Total households	1,551	2,262	672	1,714	6,199	
One or more housing problems	1,053	1,885	596	1,419	4,953	80%
Cost burdened	1,043	1,835	550	1,415	4,893	79%
Severely cost burdened	645	1,370	378	1,147	3,540	57%

	Extremely Low-Income Homeowners					
	Elderly	Small Family	Large Family	All Other	Total	
Total households	2,081	1,008	334	725	4,148	
One or more housing problems	1,416	782	294	484	2,976	72%
Cost burdened	1,406	778	280	484	2,948	71%
Severely cost burdened	700	613	230	373	1,916	46%

The St. Clair County Housing Authority’s (SCCHA) public housing and Section 8 housing choice voucher programs are best fitted to address the needs of extremely low-income renters and they will be a high priority for those programs. St. Clair County’s CDBG and HOME programs will give high priority to addressing the needs of the extremely low-income homeowners.

Among the 9,571 low-income households in the County, unlike extremely low-income households, more of them are homeowners than renters. Fifty-six percent, or 5,363, are homeowners, whereas 44%, or 4,208, are renters. Low-income renter households have somewhat higher percentages, but nearly the same numbers, of housing problems as low-income owner households, but low-income owner households have both a significantly higher number and a significantly higher percentage of severe housing cost burdens than low-income renter households do:

	Low-Income Renters					
	Elderly	Small Family	Large Family	All Other	Total	
Total households	823	1,640	439	1,306	4,208	
One or more housing problems	434	944	290	812	2,480	59%
Cost burdened	434	898	156	798	2,286	54%
Severely cost burdened	85	95	37	135	352	8%

	Low-Income Homeowners					
	Elderly	Small Family	Large Family	All Other	Total	
Total households	3,047	1,269	451	596	5,363	
One or more housing problems	924	712	289	324	2,249	42%
Cost burdened	920	694	229	324	2,167	40%
Severely cost burdened	290	257	48	144	739	14%

Assistance for low-income renters will continue to be a moderate priority for the SCCHA public housing and Section 8 housing choice voucher programs while the County’s CDBG and HOME programs will give high priority to addressing the needs of low-income homeowners.

Among the 16,873 moderate-income households, more of them are homeowners than renters. Sixty-three percent, or 10,684, are homeowners, whereas 37%, or 6,289, are renters. Moderate-income owner households have significantly higher numbers and significantly higher percentages of housing problems and cost burdens than moderate-income renter households do:

	Moderate-Income Renters					
	Elderly	Small Family	Large Family	All Other	Total	
Total households	674	2,616	579	2,370	6,289	
One or more housing problems	181	457	133	385	1,156	18%
Cost burdened	181	340	10	340	871	14%
Severely cost burdened	49	28	0	30	107	2%

	Moderate-Income Homeowners					
	Elderly	Small Family	Large Family	All Other	Total	
Total households	4,273	3,834	1,035	1,542	10,684	
One or more housing problems	575	1,214	413	536	2,738	26%
Cost burdened	539	1,184	274	522	2,519	24%
Severely cost burdened	118	241	61	75	495	5%

Due to their relatively low numbers and their low percentage of housing problems, providing assistance to moderate-income renter households will be a low priority for St. Clair County. However, due to their large numbers, assistance to moderate-income owner households with housing problems will continue to be a high priority for the County.

Specific Housing Objectives (91.215 (b))

1. Describe the priorities and specific objectives the jurisdiction hopes to achieve over a specified time period.
2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the strategic plan.

3-5 Year Strategic Plan Specific Housing Objectives response:

1. To meet the affordable housing needs of its very low, low and moderate income residents, St. Clair County has devised the following three priority housing strategies.
 - Owner-Occupied Single-Family Home Rehabilitation
 - Single-Family Home New Construction
 - Homebuyer Assistance Program

Priority need-levels were established by determining the types of activities that can be carried out under each grant program:

- CDBG - Over the next three to five years, the County plans to continue using a portion of its CDBG funding to supplement the present owner-occupied Housing Rehabilitation Loan/Grant Program and the Emergency Repair Program. All program funds will benefit low-income residents of the County.

- HOME - Over the next three to five years, the County plans to continue using a portion of its HOME dollars to fund the present owner-occupied Housing Rehabilitation Program. The County will continue funding a Homebuyer Assistance Program and the construction of New Single Family Homes. All program funds will benefit the low-income residents of St. Clair County.

All eligible persons (i.e. elderly, special needs, homeless, small families and large families) throughout St. Clair County may seek assistance for any of the above mentioned programs. However the feasibility of the above programs are contingent on future funding.

2. **Owner-Occupied Single-Family Home Rehabilitation**

Housing rehabilitation is a problem for most low-income households who usually have very little funds available to do the necessary maintenance and up-keep. Of the 14,825 low-income households in the County, slightly more than 37% own their homes. Among those with the lowest incomes (0% to 30% MFI), almost 3 out of every 4 households experienced some housing problem.

Of the 16,292 low-income households in the range of 50% to 80% MFI, slightly more than 62% own their homes. Only 8% of the elderly in this category have experienced some housing problems. In contrast, 31% of the non-elderly in this category reported housing problems. Buying and maintaining a home posed less of a financial problem for elderly owners, but more of a problem for non-elderly owners than renters in this category.

Of the 7,511 moderate-income households, slightly more than 69% own their homes. Only 7% of the elderly in this category have experienced some housing problems.

Through the Owner-Occupied Single-Family Home Rehabilitation Grant/Loan Program, the following needs will be addressed:

- Improves the quality of life for low income persons by providing financial assistance for home repair, allowing the home to meet St. Clair County Housing Maintenance Standards;
- Promotes neighborhood stabilization by allowing disabled persons to stay in familiar surroundings (their homes);
- Stabilizes affordable housing stock in existing neighborhoods by mitigating the housing availability barrier;
- Mitigates housing barriers to disabled persons;
- Promotes neighborhood revitalization and enhancement;
- Addresses underserved needs (gaps in services) to financially assist clients in their need to: (1) foster and maintain affordable housing (2) remove the barriers to affordable housing, by allowing low-moderate income citizens, who cannot afford home repairs, to remain in homes that may otherwise deteriorate to level where the home is no longer habitable (3) fund activities needed to preserve affordable housing in older, poor communities;

- Reduces potential for slum and blight, reducing potential for urban sprawl.

Owner Occupied Single-Family Home New Construction

Home prices in St. Clair County vary widely; the strongest markets are in O'Fallon and the northeast end of Belleville between Shiloh and Belleville. The weakest real estate markets are in the bottoms – Alorton, Centreville, and Washington Park (where we subsidized construction of new homes) and Brooklyn where many residents have little residual value. In other communities such as Lebanon and Mascoutah, which were once rural-oriented small towns, there is a strong upsurge in construction activity. In those communities where real estate markets are strong, the prices for new homes have driven up the prices of existing ones.

Through Single-Family Home New Construction, the following needs will be addressed:

- Assist low to moderate-income County residents to improve their quality of life by subsidizing the cost of building a new home;
- Promote neighborhood revitalization and enhancement;
- Stabilize the affordable housing stock by mitigating the housing availability barrier;
- Reduce a possible poverty/income barrier by relaxing some of the stringent home buying requirements such as: credit, income, down payment, etc.;
- Remove communication barriers by continuing to utilize non-profits organizations (such as CHDOs) to provide housing.

The County also plans to enlist private developers in the construction of single-family homes over the next 5 years. The County will consider any request for assistance, as long as it is allowable under the regulations governing the particular funding source, including, but not limited to construction financing, sales-price write down assistance and a commitment of funds for homebuyer assistance for eligible buyers.

Homebuyer Assistance

It has been difficult for several lending institutions to approve mortgage loan applications for many very low to moderate-income applicants. Some of the major reasons for rejection included: adverse credit, insufficient income, and lack of funds/resources to meet down payments requirements.

The primary purpose of the Homebuyer Assistance Program is to assist low-to-moderate income households in purchasing decent, safe, and sanitary housing throughout the entitlement area. The County's mission for this program is to stabilize the housing stock and build community strength through home ownership for those with low incomes.

Through the Homebuyer Assistance Program, the following needs are addressed:

- Assist low to moderate-income County resident to improve their quality of life by funding such cost as: closing costs and down payments;
- Promote neighborhood revitalization and enhancement by the promotion of homeownership;
- Stabilize the affordable housing stock by mitigating housing availability barriers;
- Reduce a possible poverty/income barrier by relaxing some of the stringent requirements such as: credit, income, down payment, etc.
- Remove communication barriers by continuing to utilize non-profits organizations and CHDOs to provide housing counseling and other related service to potential homeowners.

In addition, efforts with local organizations to offer mortgage and home improvement assistance and efforts to maintain infrastructure in sound condition will be continued. Lending institutions will be encouraged to continue efforts towards providing financing to potential homebuyers throughout St. Clair County and neighborhood organizations concerned with providing standard housing will be encouraged.

The County will provide one-time assistance per eligible household to purchase an owner-occupied single-family home in St. Clair County except the City of East St. Louis, which is a separate entitlement community. The amount of assistance will vary depending on funding source. The County will use HOME and Illinois Housing Development Authority funds for this program. The County also intends to investigate other possible sources in order to expand the Program to serve as many people as possible.

All agreements with homebuyers will include the following provision:

In the event Home Buyer sells or transfers ownership of the Unit during the Affordability Period, or the Unit does not continue to be the principal residence of the Home Buyer for the duration of the Affordability Period, the HOME Investment shall become immediately due and payable. Notwithstanding the foregoing, and any provision of the Home Buyer Second Note or the Home Buyer Second Mortgage to the contrary, if the Net Proceeds (hereinafter defined) from the sale of the Unit are not sufficient to repay the HOME Investment, plus enable the Home Buyer to recover the amount of the Home Buyer's Investment (hereinafter defined), the Net Proceeds shall be proportionally shared by Home Buyer and County in accordance with the following formulas:

$$\frac{\text{HOME Investment}}{\text{HOME Investment} + \text{Homebuyer Investment}} \times \text{Net Proceeds} = \text{Amount paid to County}$$

$$\frac{\text{Home Buyer Investment}}{\text{HOME Investment} + \text{Homebuyer Investment}} \times \text{Net Proceeds} = \text{Amount paid to Home Buyer}$$

"Affordability Period" means a period of 5 years provided that the Home Loan is less than \$15,000; 10 years if the Home Loan is between \$15,000 and \$40,000; and 15 years if the Home Loan is \$40,000 or more (see 24 CFR 92.254).

"Net Proceeds" means the sales price of the Unit minus repayment of the Homebuyer Private Loan and reasonable and customary closing costs.

"Home buyer's Investment" means the sum of the Home buyer's down-payment upon acquisition of the Unit plus any third party capital improvement costs paid by the Home buyer since the date of purchase of the Unit.

Provided that there is then no default under the documents evidencing or securing the Home Loan, upon expiration of the Affordability Period, the County shall cancel the Homebuyer Second Note and release the Homebuyer Second Mortgage.

Needs of Public Housing (91.210 (b))

In cooperation with the public housing agency or agencies located within its boundaries, describe the needs of public housing, including the number of public housing units in the jurisdiction, the physical condition of such units, the restoration and revitalization needs of public housing projects within the jurisdiction, and other factors, including the number of families on public housing and tenant-based waiting lists and results from the Section 504 needs assessment of public housing projects located within its boundaries (i.e. assessment of needs of tenants and applicants on waiting list for accessible units as required by 24 CFR 8.25). The public housing agency and jurisdiction can use the optional Priority Public Housing Needs Table (formerly Table 4) of the Consolidated Plan to identify priority public housing needs to assist in this process.

3-5 Year Strategic Plan Needs of Public Housing response:

SCCHA's public housing inventory was originally constructed during a period ranging from the mid 1960's to the late 1970's, resulting in an age range from 40 to 50+ years. Capital improvements have been completed over the years as funds were available. As reflected in SCCHA's 5-Year Capital Improvements Plan, the physical needs of the properties are great and far exceed current HUD funding levels. However, all of the public housing stock is considered viable and there are no plans to demolish or otherwise remove any of the public housing properties at this time. See Table 4 on the following page

SCCHA plans to complete an updated Section 504 assessment of needs of tenants and applicants on the waiting list for accessible units as required by 24 CFR 8.25 during the current fiscal year. Prior assessments have indicated that the vast majority of residents, participants, and applicants with disabilities have disabilities of a nature that do not require significant physical modifications to make units accessible. Prior assessments have indicated a need for accessible units at two levels: (a) for those with mobility impairments that prohibit walking up steps (requiring ground floor or elevator units); and (b) for those who use wheel chairs resulting in the need for units that are more comprehensively accessible (ramps, wider doorways, wider turning radius in kitchens/bathrooms, lower cabinets/countertops, etc.). The demand for units accessible to persons with

simple mobility impairments exceeds that for fully accessible units by wheelchair users. A small percentage of the target population (5% or less) has indicated a need for unit accommodations resulting from vision or hearing impairments. SCCHA has modified its public housing inventory to meet minimum Section 504 accessibility requirements having made at least 5% of its overall public housing inventory accessible to meet the needs of persons with mobility, vision and/or hearing impairments. Additionally, SCCHA continually responds to resident requests for accessibility accommodations on a case by case basis. It is further noted that a full 30% of participating families in SCCHA's Section 8 Housing Choice Voucher Program (HCVP) report having a disability.

**Priority Public Housing Needs
St. Clair County
2010–2014**

Public Housing Need Category	PHA Priority Need Level High, Medium, Low, No Such Need	Estimated Dollars To Address
Restoration and Revitalization		
Capital Improvements	High	10,000,000
Replacement Housing Factor	High	2,000,000
American Recovery & Reinvestment Act – Formula Grant	High	2,000,000
American Recovery & Reinvestment Act – Competitive Grants (9 separate grants)		
Other (Specify)		
Management and Operations		
Public Housing Operations—Subsidy	High	20,965,000
Rental Income	High	8,206,000
Interest on General Investments	High	100,000
Other : Charges to Residents	High	650,000
Section 8 – Tenant Based Assistance—HAP	High	51,173,000
Administrative Fee	High	5,581,000
Improved Living Environment		
Improved Living Environment	Included w/Capital Improvements	
Neighborhood Revitalization (non-capital)		
Capital Improvements	Included w/Capital Improvements	
Safety/Crime Prevention/Drug Elimination	High	1,500,000
Other (Specify)		
Economic Opportunity		
Resident Opportunities/Family Self Sufficiency (ROSS) Grants		
Other (Specify)—Elderly/Disabled Service Coordinator	High	300,000
Family Resource Center	High	300,000
Total		102,775,000

The location and bedroom sizes of the public housing inventory are summarized on the next below.

St. Clair County Housing Authority Location/Unit Size and Type Summary												
Public Housing	Senior or Disabled Number of Bedrooms		Senior Only Number of Bedrooms		Disabled Only Number of Bedrooms		Family Units (seniors and disabled may apply)					Total
	0	1	2	1	2	1	2	3	4	5		
Alorton							6	16	11	11		44
Belleville												48
Belleville 1			48									38
Belleville 2			38									64
Araber			60	4								158
Brooklyn							28	66	48	12	4	
Cantreville												
Adeline James			31	1								32
Ernest Smith	8						20	46	95	8	8	185
Private Math.							17	112	73	11		213
Dupo	4	2						4	6	2		20
Lebanon					4			12	8			24
Lenzburg					4			8	4			16
Marrissa			14					12	4	2		32
Millstadt			12					4	2			18
New Athens								12				32
O'Fallon			16		4			20				20
Smithton												16
Swansea									2	2		10
Washington Park												16
Subtotal	4	58	2	5	32	0	71	324	253	48	12	1,002
Non Public Housing												
Gwen. Court			14									14
Townhouse Court									4	4		8
St. Libory							12	4				16
Cedar Ridge			20									24
Subtotal	0	34	4	0	0	0	12	4	4	4	0	62
TOTAL	4	92	6	5	32	0	83	328	257	52	12	1,064

Public Housing Strategy (91.210)

1. Describe the public housing agency's strategy to serve the needs of extremely low-income, low-income, and moderate-income families residing in the jurisdiction served by the public housing agency (including families on the public housing and section 8 tenant-based waiting list), the public housing agency's strategy for addressing the revitalization and restoration needs of public housing projects within the jurisdiction and improving the management and operation of such public housing, and the public housing agency's strategy for improving the living environment of extremely low-income, low-income, and moderate families residing in public housing.
2. Describe the manner in which the plan of the jurisdiction will help address the needs of public housing and activities it will undertake to encourage public housing residents to become more involved in management and participate in homeownership. (NAHA Sec. 105 (b)(11) and (91.215 (k))
3. If the public housing agency is designated as "troubled" by HUD or otherwise is performing poorly, the jurisdiction shall describe the manner in which it will provide financial or other assistance in improving its operations to remove such designation. (NAHA Sec. 105 (g))

3-5 Year Strategic Plan Public Housing Strategy response:

1. The St. Clair County Housing Authority (SCCHA) currently has an inventory of 1,064 public housing units and administers 1,575 Section 8 Housing Choice Vouchers. Units for larger (3+ BR) households and residents with special needs (the elderly and those with disabilities) are in short supply. Few units are vacant and all can be made suitable for occupancy. The SCCHA does not feel there is a need to develop more public housing, but may be interested in examining the possibility of utilizing public-private partnerships in to develop mixed-income, mixed-finance developments, particularly in addressing housing needs of the population with unmet special needs. This strategy could be critical in addressing SCCHA's aging housing stock.

There is a great need for privately developed affordable, decent, safe, and sanitary rental and owner occupied housing assistance in the Centreville, Alorton, and Brooklyn areas of the County for people who wish to remain in those communities. The SCCHA pledges to work with local municipal officials to eliminate blighted areas within the County.

The SCCHA maintains site-based waiting lists at each of their 18 developments. The current total of 13,202 for these 18 public housing waiting lists includes duplicates because applicants that apply for more than one location are counted once for each location for which they apply. The current waiting list for Section 8 Housing Choice Vouchers is 5,506 households, which is an unduplicated count. Although these numbers seem somewhat large, many are applicants from outside the SCCHA's jurisdiction. These are people who do not reside in St. Clair County, but apply here as well as simultaneously in Madison County, St. Louis County, St. Louis City and the City of East St. Louis. They are given very low placement priority.

Landlord interest in renters with Housing Choice Vouchers has waned. That is due to the elimination of incentives. Formerly, landlords were reimbursed for damage caused by Housing Choice Voucher residents. They were also given up to 60 days vacancy loss rent, when clients suddenly left. Neither of these features is currently available. The larger number of non-assisted renters, combined with the elimination of the features just described, results in a resistance to rent to tenants with Housing Choice Vouchers. This is not a problem that would be resolved by more Housing Choice Voucher housing.

2. The majority of SCCHA public housing residents are represented by resident-elected Resident Councils. SCCHA supports these Resident Councils financially and also provides technical assistance and other in-kind support when requested and to the extent possible. SCCHA also has a Resident Advisory Board for the development and annual update of its Agency Plan.

Although SCCHA has administered a Family Self-Sufficiency Program for a number of years, it is phasing out the program due to inadequate funding levels. SCCHA has two Family Resource Centers operating at the two large housing developments in Centreville and has a Senior Services Coordinator to assist elderly and disabled residents and to coordinate activities for seniors.

SCCHA's strategy for serving the needs of extremely low-income, low-income, and moderate-income families residing in the jurisdiction encompasses the following:

To maximize the number of affordable units available to SCCHA within current resources by:

- Employing effective maintenance and management policies to minimize the number of public housing units off-line;
- Reducing turnover time for vacated public housing units;
- Maintaining or increasing Section 8 Lease-up rates by establishing payments standards that will enable families to rent throughout the jurisdiction;
- Undertaking measures to ensure access to affordable housing among families assisted by the PHA, regardless of unit size required;
- Maintaining or increasing Section 8 lease-up rates by marketing the program to owners, particularly those outside of areas of minority and poverty concentration;
- Maintaining or increasing Section 8 lease-up rates by effectively screening Section 8 applicants to increase owner acceptance of program;
- Participating in the Consolidated Plan development process to ensure coordination with broader community strategies.

To increase the number of affordable housing units by:

- Applying for additional Section 8 units designated for household with disabilities should the opportunity become available.
- Supporting the efforts of others to increase the number of affordable housing units (i.e. using low-income housing tax credit and other federal, state and/or local programs).

To target available assistance to families at or below 30% of area median income (AMI) by:

- Exceeding HUD federal targeting requirements for families at or below 30% of AMI in public housing;
- Exceeding HUD federal targeting requirements for families at or below 30% of AMI in tenant-based Section 8 assistance;
- Employing admission preferences aimed at families with economic hardships;
- Adopting rent policies to support and encourage work.

To target available assistance to families at or below 50 of AMI by:

- Employing admissions preferences aimed at families who are working;
- Adopting rent policies to support and encourage work.

To target available assistance to the elderly by:

- Designating certain public housing units for occupancy by senior citizens only (those age 62 or older).

To target available assistance to families with disabilities by:

- Designating certain public housing units for occupancy by non-senior persons with disabilities;
- Carrying out modifications needed in public housing based on the Section 504 Needs Assessment for Public Housing;
- Affirmatively marketing to local non-profit agencies that assist families with disabilities.

To conduct activities to affirmatively further fair housing by:

- Counseling Section 8 tenants as to location of units outside of areas of poverty or minority concentration and assist them to locate those units;
- Marketing the Section 8 program to owners outside of areas of poverty / minority concentrations.

SCCHA's strategy for addressing the revitalization and restoration needs of its public housing properties, improving the management and operation of the public housing program, and improving the living environment of families residing in public housing include the following:

Effectively using the Capital Fund Grant program for physical improvements by:

- Applying for other capital improvement funds when available (such as County weatherization program);
- Implementing effective routine and preventive maintenance programs;
- Providing training and professional development for front-line and supervisory employees;
- Achieving “high performer” designation under HUD’s public housing assessment system;
- Employing effective applicant screening techniques/practices to screen-out undesirable households;
- Employing effective lease enforcement techniques/practices to evict undesirable households residing in public housing.
- Engaging, supporting and cooperating with local law enforcement to ensure the level of service provided the public housing neighborhoods is at or above that provided the community at large.
- Making collaborative efforts with law enforcement, resident organizations, and others to ensure that the level of criminal activity in the public housing developments is at or below the surrounding neighborhoods.

St. Clair County helps address the needs of public housing and its residents by:

- Making grant monies available to assist residents with rent, security deposits, utility bills and other services when available.
- Making grant monies available for infrastructure improvements (roads, sewers, etc.) and physical improvements to public housing units (i.e. weatherization) subject to fund availability and competing needs.

3. N/A

Barriers to Affordable Housing (91.210 (e) and 91.215 (f))

1. Explain whether the cost of housing or the incentives to develop, maintain, or improve affordable housing are affected by public policies, particularly those of the local jurisdiction. Such policies include tax policy affecting land and other property, land use controls, zoning ordinances, building codes, fees and charges, growth limits, and policies that affect the return on residential investment.
2. Describe the strategy to remove or ameliorate negative effects of public policies that serve as barriers to affordable housing, except that, if a State requires a unit of general local government to submit a regulatory barrier assessment that is substantially equivalent to the information required under this part, as determined by HUD, the unit of general local government may submit that assessment to HUD and it shall be considered to have complied with this requirement.

3-5 Year Strategic Plan Barriers to Affordable Housing response:

1. The cost of housing and the incentives to develop, maintain, or improve affordable housing are primarily affected by high State and local real property tax rates that discourage residential development. Tax rates in American Bottoms communities are so high that they inhibit new construction and restrict renovation. Even the most modest new houses require such high monthly tax payments that we are often unable to make the total monthly housing cost affordable for low-moderate income homeowners. Existing property owners are often reluctant to make improvements to their property because the improvements will increase their real estate taxes further.

IGD is also committed to ensuring that the affordable housing (and market-rate housing) that is available throughout St. Clair County is available to persons and families regardless of their race, color, national origin, religion, sex, familial status or handicap. To that end, IGD updated St. Clair County's Analysis of Impediments to Fair Housing in July of 2010. The updated Analysis of Impediments is available from IGD upon request.

2. IGD will continue to provide down payment and closing cost assistance to low-income buyers. We will also continue to work with a consortium of banks known as the Metro-East Lending Group, which has increased the availability of home financing, particularly in the American Bottoms area, through education and product expansion. But in some areas, such as the East St. Louis area, there are about 40,000 residents but 20,000 are under 20 years of age and only 3,500 are wage earners. These demographics make for a very limited market area. And we will continue to work with the Housing Acquisition Program in targeted central areas of Belleville, under which lenders combine resources for low-income buyers. The program features a 5% down payment requirement and no PMI (private mortgage insurance).

Several municipalities are also participating in the Tax Increment Financing (TIF) program. Under this program, municipalities may designate blighted residential neighborhoods, commercial business districts, or industrial areas for redevelopment. Tax increment financing allows municipalities to capture the increase in local property taxes that results from redevelopment projects to pay for the public facilities related to the project.

Economic Development is the long-range strategy to improve the problem we have with property assessments. The Economic Development Department works to create more and better employment opportunities for St. Clair County residents. It makes low-interest loans to businesses that hire low-moderate income residents. With the creation and expansion of businesses and more employment, total assessed valuation must increase in these areas.

HOMELESS

HOMELESS

Homeless Needs (91.205 (b) and 91.215 (c))

*Please also refer to the Homeless Needs Table in the Needs.xls workbook

Homeless Needs— The jurisdiction must provide a concise summary of the nature and extent of homelessness in the jurisdiction, (including rural homelessness and chronic homelessness where applicable), addressing separately the need for facilities and services for homeless persons and homeless families with children, both sheltered and unsheltered, and homeless subpopulations, in accordance with Table 1A. The summary must include the characteristics and needs of low-income individuals and children, (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered. In addition, to the extent information is available, the plan must include a description of the nature and extent of homelessness by racial and ethnic group. A quantitative analysis is not required. If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates.

3-5 Year Strategic Plan Homeless Needs response:

St. Clair County's Homeless Management Information System (HMIS) helps track data on persons who are either homeless or at imminent risk of becoming homeless. All agencies receiving homeless prevention funds, 80% of shelters and 50% of homeless service agencies report on the HMIS system, and, because homeless persons often utilize multiple services, it is likely that a high percentage of homeless and at-risk persons are accounted for on the HMIS system. However, there is no way to know for certain how many homeless and at-risk persons are uncounted.

For the year 2009, 962 unduplicated homeless and at-risk households received services and were recorded in the HMIS. From the HMIS, we can gain a sense of the demographic of these households. Although there are families in the system, most households are individuals. 85% of the 962 households are individuals, 12% are families of between two and four persons, and 3% are families with five or more members. 63% of HMIS households have a female head of household and 37% have a male head of household. 47% had a head of household over the age of 50, 36% had a head of household between 31 and 50, 15% had a head of household between 21 and 30, and the remaining 2% had a head of household under the age of 21. 92% of households were African American, and nearly all the remaining 8% of households were Caucasian. Because the HMIS includes households at risk of becoming homeless, 73% of households said that they were living in a non-subsidized rental unit. 11% of households were staying with a family or friend temporarily. There were also smaller subpopulations staying in emergency shelters, motels, moving place to place, sleeping on the street, or staying in substance abuse facilities.

As is the case in most areas of the country, census tracking of the homeless is extremely difficult and there is no universally agreed upon census method to establish a reliable count. As result, census counts of the homeless are widely looked upon as underreported. However, based on point of time counts, IGD has estimated that there are 536 homeless individuals and families, with 294 being unsheltered. It is likely that these individuals and families share similar demographics to the individuals and families recorded in the HMIS, although the HMIS also includes individuals and families at risk of being homeless.

Regardless of the exact number of homeless persons in St. Clair County, it is clear that there is an unmet need. Local service providers have verified that the homeless population in St. Clair County is larger than reported, some estimating it to be as many as 1,500 to 2,000 individuals and growing. These local service providers have indicated that the demand for services far outpaces available resources.

Reasons for a potentially increasing homeless population include job losses from the declining economy and the increase in the cost of living. Household expenses have increased in the areas of food, rent, fuel, utilities, education, medical, etc. The current economy has created over-crowded conditions in existing shelters and a devastating impact on the quality of outreach and assessment services provided by local service providers.

The overcrowded conditions in the shelters leave little room for the families that are homeless. As shown in the survey of social service agencies and governments in St. Clair County, other populations (in addition to families) were identified as having homeless segments. Additionally, many of the clients of mental health agencies, such as Chestnut Health Systems, are homeless.

Priority Homeless Needs

1. Using the results of the Continuum of Care planning process, identify the jurisdiction's homeless and homeless prevention priorities specified in Table 1A, the Homeless and Special Needs Populations Chart. The description of the jurisdiction's choice of priority needs and allocation priorities must be based on reliable data meeting HUD standards and should reflect the required consultation with homeless assistance providers, homeless persons, and other concerned citizens regarding the needs of homeless families with children and individuals. The jurisdiction must provide an analysis of how the needs of each category of residents provided the basis for determining the relative priority of each priority homeless need category. A separate brief narrative should be directed to addressing gaps in services and housing for the sheltered and unsheltered chronic homeless.
2. A community should give a high priority to chronically homeless persons, where the jurisdiction identifies sheltered and unsheltered chronic homeless persons in its Homeless Needs Table - Homeless Populations and Subpopulations.

3-5 Year Strategic Plan Priority Homeless Needs response:

1. IGD has established four priorities to respond to the needs of the homeless:
 - a. Continue IGD's relationship with the Homeless Action Council in coordinating efforts in streamlining service delivery to the homeless population of St. Clair County. These efforts may include financial assistance.
 - b. Continue the IGD Community Development Division's relationship with the Housing Counseling and Assistance Center. These efforts may include financial assistance for travel and training expenses, and administrative support (space costs), and matching funds.
 - c. Continue administration of and application for Shelter Plus Grants.
 - d. Continue working with individual service providers in order to meet the needs of the County's homeless population.

St. Clair County administers several programs to assist the Emergency Shelter and Transitional Housing Needs of homeless individuals and homeless families, homeless prevention programs for the at-risk population, and assistance to help homeless persons make the transition to permanent housing and independent living.

In attempting to delineate the needs of the homeless in St. Clair County, we have identified four (4) areas in which we feel there is either a total lack of service or where the need exceeds what is available.

- Emergency Shelter
Emergency shelter is basic, temporary, overnight sleeping accommodation; which sometimes includes a meal and a few services, such as life-sustaining medication, counseling services and budgeting assistance. There is a continued need for additional emergency shelter bed space in St. Clair County. There are also needs for seasonal cooling and warming centers and year-round needs for motel vouchers.
- Transitional Housing
Transitional housing combined with supportive services to:
 - i. Assist homeless families and individuals overcome the problems/ conditions that made them homeless and return to living as independently as possible.
 - ii. Increase skills and/or income and to obtain and remain in permanent housing.
 - iii. Provide or coordinate, as necessary, substance abuse services, mental health services, day care, life skills training, educational services, family support and other services.
- Permanent Supportive Housing
There is a need for permanent housing with supportive services to meet individual needs of homeless persons and families. This includes housing for homeless persons, including those that are hard-to-serve

due to disabilities. There is a profound need for the provision of independent and stable living conditions.

- Supportive Services

The demand for these services exceeds the available resources. Through the use of the HMIS and Point-In-Time counts, data shows that the homeless population has increased and the ability to meet the needs has decreased due to the economy and the reduction of available funding. Needs include, but are not limited to, Case Management, Rental Assistance, transportation, food, clothing, and other life-related essentials.

The extent to which the existing systems, both public and private, address homelessness prevention, outreach, assessment, shelter services, transitional services, and permanent housing are listed as follows:

- Homeless persons and families receive housing through St. Clair County Housing Authority programs, Hoyleton Youth and Family Services, Shelter Plus Care programs and other Supportive Housing Programs.
 - Local service providers that house homeless individuals who have AIDS or who are infected with HIV report a growing population and demand exceeding their ability to meet the need. Although these clients do not generally have transient lifestyles, their families cannot house them. To meet the need for transitional housing, Bethany Place opened in 1999. This organization offers rooms for individuals with HIV or AIDS. HUD/HOPWA Officer, Paula Smith, recognized Bethany Place, as "one of three examples (nationwide) on how housing opportunities for people with AIDS could and should be implemented."
2. IGD gives a high priority to chronically homeless persons, with 47 beds reserved especially for the chronically homeless. Although there are currently 99 persons identified as chronically homeless, available beds cover 47% of the need among the chronically homeless, and 31% of the need among the homeless population in general. In other words, the chronically homeless population is being served at a higher rate than the general homeless population. IGD and the HAC will continue to increase the number of beds available for all homeless populations and subpopulations as funding permits, and will continue coordination of services, including prevention services, to effectively reduce the homeless population.

Homeless Inventory (91.210 (c))

The jurisdiction shall provide a concise summary of the existing facilities and services (including a brief inventory) that assist homeless persons and families with children and subpopulations identified in Table 1A. These include outreach and assessment, emergency shelters and services, transitional housing, permanent supportive housing, access to permanent housing, and activities to prevent low-income individuals and families with children (especially extremely low-income) from becoming homeless. The jurisdiction can use the optional Continuum of Care Housing Activity Chart and Service Activity Chart to meet this

requirement.

3-5 Year Strategic Plan Homeless Inventory response:

St. Clair County's support services network is a collective system of not-for-profits organizations, private and public social service agencies. Each entity works with other service providers to coordinate varying services in order to assist as many homeless persons and families as possible. There are approximately thirteen agencies in the County's jurisdiction that provide emergency or temporary shelter for the homeless, these are:

CDBG Operations, Inc.
510 North 25th Street
East St. Louis, Illinois 62205

This 501(3c) organization houses a transitional shelter for 17 families and permanent housing for homeless, disabled individuals and families. They offer additional supportive services such as emergency food and shelter grants, and rental assistance. They are a HUD certified housing counseling agency.

American Red Cross
St. Clair County District
10218 Lincoln Trail
Fairview Heights, IL 62208

The Red Cross serves all of St. Clair County plus the City of Collinsville. It provides twenty-four hour assistance for disaster victims, military and their families. It makes reports for decisions about emergency leave, discharges or clemency, and obtains social histories for medical treatments. Casework is provided for disabled veterans. Financial assistance is provided to military and others in certain situations. Other services offered are emergency shelter, food, and clothing to victims of tornadoes, floods, home fires, and other disasters. Items such as furniture or essential appliances may be included, depending on need.

Violence Prevention Center of Southwestern Illinois
Post Office Box 831
Belleville, IL 62222-0831

Founded in 1979, the mission of the Center is to work to eliminate domestic violence in individual lives and in society as a whole by providing comprehensive services to victims of family violence, focusing primarily on women, children, and the elderly. The Center provides a 24-hour crisis hotline, and a shelter for up to 28 battered women and their dependent children at a given time. Counseling and advocacy services include individual (children, youth, and adult) and group counseling, assistance obtaining orders of protections, and police advocacy in eight local law enforcement agencies. Prevention and education services are provided through seminars and training on issues about domestic violence. The Center of Metro East now employs 28 full-time and 8 part-time staff members, two of which are registered nurses. The Center also benefits from the extraordinary assistance of over 350 volunteers.

The Salvation Army
4102 West Main Street
Belleville, IL 62226

The Salvation Army has been providing services in St. Clair County area for 111 years. Services provided include: food, clothing, shelter, emergency services, alcohol and drug rehabilitation, treatment for abused and neglected children, day care, life-skills training, character building programs, summer day camps, job training, counseling, latch key and camping experiences. Services are provided 24 hours a day, 365 days a year so as to empower homeless families the opportunity to change their situations, and to provide a safe haven for infants and children away from abusive environments due to chemical addiction and other dysfunctional circumstances. The Salvation Army also provides transportation, hygiene items, appropriate clothing for work, agency referrals, personal counseling, assistance in obtaining a GED, access to laundry facilities/supplies, and 3 well-balanced meals each day. Assistance is available for purchase of identification cards, birth certificates and limited prescription medications. Residents are also assisted in securing transitional or permanent housing. Funding is available to assist with rent and/or utility payments during a temporary financial crisis or emergency situation.

St. Clair County Veterans Assistance Commission
#19 Public Square, Suite 403
Belleville, IL 62220

The St. Clair County Veterans Assistance Commission provides temporary aid to those indigent war veterans and their families that reside in the county that may qualify for and need assistance. The commission provides services to the veteran and his family that may not be available from other agencies. Veterans must accept the responsibility and duty to care for those who can not care for themselves.

Children's Home and Aid Society of Illinois
7623 West Main Street
Belleville, IL 62223

The council serves as advocate for children, youth and families in St. Clair County for comprehensive, preventive, diagnostic, treatment, care, and rehabilitation. Special education and social services are offered. The council educates and informs the community about the need for services to children. It provides emergency temporary shelter (limited to 10 days) and crisis family counseling for youths 13 - 18 classed as status offenders. Foster care and teen-age pregnancy counseling services are available.

Catholic Urban Programs (Holy Angels Shelter)
771 Vogel Place
East St. Louis, IL 62205

This program provides temporary shelter for women and their dependents (and some two-parent families). It offers individual and group counseling, referrals, client advocacy, and emergency transportation. Immediate needs such as clothing, food and money are provided.

Call for Help, Inc.
9400 Lebanon Road
Edgemont, Illinois 62203

Call For Help is a not-for-profit, 501-C3 SOCIAL SERVICE agency, which provides a variety of crisis intervention and support services to residents in St. Clair County. Through the Information and Referral program the agency provides rental assistance to prevent eviction and homelessness. There are 3 residential programs providing shelter and supportive services to the homeless. The Adult Residential Shelter provides emergency shelter to those who are mentally ill and are homeless. The Youth Emergency Shelter provides shelter and support services to youth between the ages of 12 through 17. The Transitional Living Program provides services to homeless women, both with and without children. The 24 hour Suicide and Crisis Line answers calls on the Homeless Hotline after hours and on weekends and holidays.

Chestnut Health Systems
Various Sites

Chestnut Health Systems provides behavioral health care services in Southwestern Illinois. Services include psychiatric evaluation, therapy, and case management as necessary. Credit Counseling and hotel vouchers are also provided for the homeless and those in transitional situations.

Catholic Social Services
(Don Bosco Children's Center)
300 North Church
Belleville, IL 62220

This agency is an emergency shelter for abused and neglected children ages newborn to 12 years. DBCC has served over 1470 children since opening in 1992. The type of child served varies greatly from the crack cocaine affected infant to the sexually aggressive angry young man. This facility has the capacity to serve 12 school age children and 4-5 nursery age children at a time.

Community Service Block Grant Program
(Homeless Programs)
19 Public Square
Belleville, IL 62220

The Community Service Block Grant Program provides the following services for Homeless and/or near Homeless Persons (guidelines are lower than the very low income guidelines for CDBG):

- Homeless Financial Assistance - provides one month's rent, limited furniture items and utility assistance to Community Services Block Grant eligible individuals to assist in securing permanent housing placement. Provides assessment, outreach and counseling to CSBG eligible persons during placement.
- Near Homeless - prevents homelessness by providing one month's mortgage or rental assistance to Community Services Block Grant eligible individuals facing verifiable eviction or foreclosure due to a

reduction in their income. They also negotiate with the Landlord or Mortgagor to arrange payment to prevent homelessness and monies to prevent eviction.

Bethany Place
821 West "A" Street
Belleville, IL 62220

This transitional housing facility provides a one-stop-shop approach to services for HIV/AIDS. Bethany Place is a community based AIDS service organization offering both supportive services for people living with AIDS and transitional housing for men living with HIV/AIDS. Services include health care, peer support, mental health services, food and nutrition services, confidential AIDS testing, case management, HIV/AIDS education, volunteer services, community outreach, prevention education, education programs for children and youth, and new transitional housing. Bethany Place opened a five unit transitional housing in December 1999. Residents can stay up to 24 months. On site supportive services will assist in rotating clients in and out throughout a given year and will serve approximately 30 individuals.

Housing Counseling and Assistance Center
19 Public Square
Belleville, IL 62220

The HCAC includes a Homeless Assistance Center that serves as a first point of entry for the homeless to enter the COC System. It also has a computerized Homeless Management Information System (HMIS) to track homeless clients and a separate 24-hour homeless hotline. The Housing Counseling and Assistance Center also provides Homeless Financial Assistance and motel vouchers to the homeless.

Gateway Foundation, Inc.
Caseyville Treatment Center
600 West Lincoln
Caseyville, IL 62232-0630

This agency is a private, non-profit organization that provides a multitude of treatment modalities for chemically dependent individuals. Program services provided for adult clients include Social Setting Detoxification, short-term Residential Treatment (30 days), long-term Residential Treatment (up to 90 days), and Basic and Intensive Outpatient Programs. During 1999 the Caseyville Center provided services to over 1,000 individuals. Approximately 70% were from St. Clair County (the majority of which were indigent). A client's treatment plan incorporates vocational readiness, including finding suitable housing prior to completing treatment. Housing is often provided at an Oxford House that is a drug-free environment for recovering individuals in a positive social setting. This environment acts as a stable stepping-stone back to the community for the clients completing the residential program.

There are additional shelters in the City of East St. Louis, which although not in the Urban County entitlement area, provide services to the citizens of St. Clair County. They include:

- The Second Chance Shelter – shelter for families
- Dorris Helping Hand – shelter for single men
- Family Living Center – transitional housing for families
- Opal's House – shelter for domestic violence for women and children

Other agencies provide support services to residents on an as-needed basis. The primary providers are Chestnut Health Systems, the Illinois Department of Rehabilitation Services (IDORS) and Programs and Services for Older Persons (PSOP). The residents also are able to obtain the services of other community-based service providers.

The agencies discussed above provide day as well as night shelter. However, they are limited in this capacity, relative to the needs of their particular clients.

The Salvation Army, Holy Angels Shelter, and Belleville Christian Center provide soup kitchens. The Catholic Urban Program provides food "tickets" and a bus for the mobile distribution of food to the homeless. The Illinois Department of Public Aid supplies food stamps to eligible recipients.

A number of agencies and organizations in St. Clair County provide not only shelter for the homeless but also a variety of services for persons with special needs. They are listed below by service category.

Shelters

- Violence Prevention Center of Southwestern Illinois
- Salvation Army
- Interfaith Residence
- Catholic Urban Programs (Holy Angels, motel vouchers)
- Dorris Helping Hand
- Catholic Services Center (Don Bosco Children's Center)
- Bethany Place
- Second Chance Shelter
- Family Living Center
- Opal's House
- Call for Help, Inc.
- Hoyleton Youth Center

Food and Nutritional Services

- American Red Cross
- Violence Prevention Center
- Salvation Army
- Urban League
- Cahokia Community Baskets
- Catholic Urban Programs
- St. Clair County Intergovernmental Grants Department
- Call for Help
- St. Matthews United Methodist Church - Belleville
- Lessie Bates Neighborhood House
- Dorris Helping Hand
- St. Luke's Catholic Church
- St. Paul's United Church of Christ - Belleville
- Bishop Cosgrove's Kitchen
- St. Clair County Veterans Assistance Commission
- Belleville Christian Center
- St. Peter's Cathedral
- St. Mark's Lutheran Church
- Freeburg Food Pantry
- Fairview Heights Food Pantry
- Many other smaller churches also operate food pantries

Clothing Distribution

- American Red Cross
- Salvation Army
- Catholic Urban Programs
- Lessie Bates Davis Neighborhood House
- St. Paul's United Church of Christ - Freeburg
- Metro-East Baptist Association
- St. Francis Thrift Shop
- St. Matthews United Methodist Church
- St. Vincent DePaul Distribution Association, Inc.
- Dorris Helping Hand

- Belleville Christian Center

Counseling Services

- American Red Cross
- Salvation Army
- Call for Help
- Catholic Urban Programs
- Metro-east Baptist Association
- Violence Prevention Center
- St. Clair County Specialized Living Center
- Children, Family and Youth Advocacy Council
- Chestnut Health Systems
- Lessie Bates Davis Neighborhood House
- Dorris Helping Hand
- St. Clair County Association Vocational Enterprise (SAVE)
- Center for Independent Living
- Comprehensive Behavioral Health Center
- St. Clair County Community Services Division
- Neighbors United for Progress
- Urban League of Metropolitan St. Louis
- St. Clair County Housing Counseling & Assistance Center
- CDBG Operations Corporation
- Land of Lincoln Legal Assistance
- Bethany Place
- Family Living Center
- Gateway Foundation

Services for Persons with Disabilities

- St. Clair County Specialized Living Center
- Children, Family and Youth Advocacy Council
- Chestnut Health Systems
- Comprehensive Mental Health Center
- Center for Independent Living
- St. Clair County Housing Authority
- Citizens for the Disabled

- St. Clair Associated Vocational Enterprises (SAVE)
- Living Independently Now Center (LINC)
- Bethany Place
- Interfaith Residence
- Gateway Foundation
- PSOP
- St. Clair County HIV/AIDS Consortium

Homeless Strategic Plan (91.215 (c))

1. Homelessness— Describe the jurisdiction's strategy for developing a system to address homelessness and the priority needs of homeless persons and families (including the subpopulations identified in the needs section). The jurisdiction's strategy must consider the housing and supportive services needed in each stage of the process which includes preventing homelessness, outreach/assessment, emergency shelters and services, transitional housing, and helping homeless persons (especially any persons that are chronically homeless) make the transition to permanent housing and independent living. The jurisdiction must also describe its strategy for helping extremely low- and low-income individuals and families who are at imminent risk of becoming homeless.
2. Chronic homelessness—Describe the jurisdiction's strategy for eliminating chronic homelessness by 2012. This should include the strategy for helping homeless persons make the transition to permanent housing and independent living. This strategy should, to the maximum extent feasible, be coordinated with the strategy presented Exhibit 1 of the Continuum of Care (CoC) application and any other strategy or plan to eliminate chronic homelessness. Also describe, in a narrative, relationships and efforts to coordinate the Conplan, CoC, and any other strategy or plan to address chronic homelessness.
3. Homelessness Prevention—Describe the jurisdiction's strategy to help prevent homelessness for individuals and families with children who are at imminent risk of becoming homeless.
4. Institutional Structure—Briefly describe the institutional structure, including private industry, non-profit organizations, and public institutions, through which the jurisdiction will carry out its homelessness strategy.
5. Discharge Coordination Policy—Every jurisdiction receiving McKinney-Vento Homeless Assistance Act Emergency Shelter Grant (ESG), Supportive Housing, Shelter Plus Care, or Section 8 SRO Program funds must develop and implement a Discharge Coordination Policy, to the maximum extent practicable. Such a policy should include "policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent such discharge from immediately resulting in homelessness for such persons." The jurisdiction should describe its planned activities to implement a cohesive, community-wide Discharge Coordination

Policy, and how the community will move toward such a policy.

3-5 Year Homeless Strategic Plan response:

1. As explained in the previous section, IGD has established four priorities to respond to the needs of the homeless:
 - a. Continue IGD's relationship with the Homeless Action Council (HAC) in coordinating efforts in streamlining service delivery to the homeless population of St. Clair County. These efforts may include financial assistance.
 - b. Continue the IGD Community Development Division's relationship with the Housing Counseling and Assistance Center. These efforts may include financial assistance for travel and training expenses, and administrative support (space costs), and matching funds.
 - c. Continue administration of and application for Shelter Plus Grants.
 - d. Continue working with individual service providers in order to meet the needs of the County's homeless population.

All of IGD's activities fit into the larger 2009 Continuum of Care Strategic Plan, which takes into account the activities of all the members of the HAC. Over the next five years, the plan has goals for preventing homelessness, increasing the number of permanent housing beds, increasing the percentage of homeless persons staying in permanent housing over six months to 83%, increasing the percentage of homeless persons moving from transitional housing to permanent housing to 75% and decreasing the number of homeless households with children to 39 households.

Prevention is a major component of the Continuum of Care/Homeless Action Council plan and the main way in which at-risk households are served. Prevention programs are discussed further below in section 3.

2. Currently, there are a total of 99 individuals identified as chronically homeless and 47 beds reserved for the chronically homeless. The HAC has several long term strategies for eliminating chronic homelessness by 2012, as outlined in the 2009 Continuum of Care Strategic Plan. First, the HAC intends to have 82 permanent housing beds available for the chronically homeless by 2014 to assist current and future chronically homeless persons, with a portion of new housing reserved for the chronically homeless. The number of beds available has already increased from 35 beds in 2009 to 47 beds in 2010. Second, IGD will actively participate in the Illinois Supportive Housing Providers Association to advocate for funding and increase capacity. Finally, chronically homeless individuals have access to the entire spectrum of HAC and HCAC resources to help them move toward transitional and then permanent housing.

In some years, due to the difficulty in meeting the strict definition and the difficulty in documenting the "chronically homeless," the County will sometimes have beds available for the chronically homeless that it cannot fill. Therefore, the HAC and HCAC will continue to reach out to the chronically homeless in order to make them aware of the available resources. The HAC engages persons that routinely sleep on the streets through several targeted outreach programs as well as the HAC's broad network of members. The Metro East

Weather Crisis Task Force provides outreach and delivers food, blankets and clothing. Pauly's house is a one-stop drop-in center that provides a multitude of homeless services. The HAC will hold more Project Homeless Connect events, one-day events targeting the chronically homeless and featuring showers, food, health screenings, and enrollment in mainstream programs such as food stamps and SSI.

3. Preventing homelessness for individuals and families with children who are at imminent risk of becoming homeless is a priority for the St. Clair County Homeless Action Council (HAC), of which IGD is a founder and a key member. The HAC's strategy is fourfold:
 - a. First, the HAC works to coordinate prevention outreach, so as to minimize duplication of effort and maximize the effective distribution of homeless prevention funds to needy individuals and families. In response to the challenges of tracking the homeless population and service delivery, IGD established the Homeless Action Council and developed the Homeless Management Information System (HMIS) for tracking population and services. All agencies receiving homeless prevention funds have access to the HMIS to help identify persons in need and report on outcomes.
 - b. Second, the HAC administers Homeless Prevention and Rapid Re-Housing Program (HPRP) funds in order to provide intensive support and rental subsidies to families who face imminent homelessness. This is the primary approach to combating homelessness among families with children.
 - c. Thirdly, HPRP funds are complemented and leveraged by other prevention services and funding. For example, the Low-Income Home Energy Assistance Program (LIHEAP) assists low income households in paying home energy bills, in order to make housing temporarily more affordable. Community Services Block Grant (CSBG) funding provides rental, deposit, and mortgage assistance. A variety of private nonprofits provide prescription assistance, meal assistance, and utility assistance.
 - d. Finally, the HAC Executive Committee monitors client outcomes on a monthly basis in order to track the results of efforts.
4. There are two main vehicles through which the jurisdiction coordinates and carries out its homeless strategy: the Homeless Action Council (HAC) and the Housing and Counseling Assistance Center (HCAC).

The St. Clair County HAC requires service provider linkage agreements with all member agencies. The linkage agreement documents the networking, verbal agreements, and mutual understandings that exist among all member agencies. Each member agency acknowledges its own mission and responsibilities as well as dependence upon other agencies for the broad range of homeless services available. By entering into the linkage agreement, member agencies, in partnership with the HAC, agree to:

- a. Evaluate each new and existing client's needs not limited to the offerings of the single agency but with an awareness of the comprehensive network of homeless prevention funds in the county to maximize the effective distribution of homeless and other funding

- b. Refer each client to other agencies for services that will improve the client's quality of life. A person who enters this agency should have rapid access to the services provided throughout the network.
- c. Accept qualified referrals from each agency to the greatest extent possible within funding and staff constraints.
- d. Participate in development and implementation of explicit strategies of collaboration between agencies to ensure seamless, unduplicated service delivery.

St. Clair County IGD also provides administrative support to the HCAC, which serves as the first point of contact for the homeless in St. Clair County, and operates a 24-hour homeless hotline used for referrals for homeless prevention services. HCAC is listed on the HUD website as a contact for homeless services. In addition, HCAC attends numerous meetings with other agencies, many of whom are not active members of HAC. These meetings include, but are not limited to, monthly central aid registry meetings (based at Call for Help and attended by churches, food pantries, United Way, Red Cross, and other agencies not active with HAC); quarterly meetings for BEACON of Belleville (a faith based clearing house of churches, most of whom are not HAC members); St. Clair County Community Action Agency bi-monthly meetings; St. Clair County public hearings for the CAPER Plan (attended by community leaders and residents); St. Clair County Public Housing Authority public hearings (attended by staff and residents); Metro East Weather Task Force meetings, and forums held by HAC. HCAC distributes brochures and business cards so that homeless persons, those in jeopardy of becoming homeless, and the agencies and community members interested in preventing homelessness, have ready access to the services and referrals of HCAC.

- 5. St. Clair County does not receive McKinney-Vento funds for its Continuum of Care activities. Nonetheless, the jurisdiction does have policies and protocols in place for the discharge of persons from publicly funding institutions or systems of care in order to prevent such discharge from immediately resulting in homelessness for such persons. In general, each institution or system of care follows the relevant state-mandated discharge policy, as described briefly in the next paragraph.

Foster care facilities follow the Illinois Department of Children and Family Services (DCFS) discharge protocol, disseminated to all Continua of Care in the State in 2007. The Protocol enumerates four services funded by the state to prevent youth from becoming homeless upon being emancipated and/or aging out of foster care. The services include housing advocacy, start-up grants, housing subsidies, and cash assistance. Health care facilities follow the Illinois Administrative Code for health care institutions, which specifies that skilled nursing and intermediate care facilities complete a comprehensive assessment of patient needs, and ensure that all persons with psychiatric disabilities receive discharge planning that ensures appropriate housing or community placement upon release. Mental health facilities work to ensure stable housing options prior to discharge, and can utilize the non-profit agency and Continuum of Care member Call for Help, which provides 40 beds for persons leaving higher levels of care who otherwise would be homeless. Corrections facilities follow the Illinois Department of Corrections Discharge Protocol, implemented in 2002,

that requires a release plan, including the address where the released offender will reside, be developed and approved for each offender prior to release.

Systems such as the HMIS, resources such as HCAC and Call for Help's referral program, and the monthly meetings of Continuum of Care committees, help ensure a cohesive, community-wide approach to ensuring discharged persons do not become immediately homeless.

Emergency Shelter Grants (ESG)

(States only) Describe the process for awarding grants to State recipients, and a description of how the allocation will be made available to units of local government.

3-5 Year Strategic Plan ESG response: N/A

COMMUNITY DEVELOPMENT

COMMUNITY DEVELOPMENT

Community Development (91.215 (e))

*Please also refer to the Community Development Table in the Needs.xls workbook

1. Identify the jurisdiction's priority non-housing community development needs eligible for assistance by CDBG eligibility category specified in the Community Development Needs Table (formerly Table 2B), – i.e., public facilities, public improvements, public services and economic development.
2. Describe the basis for assigning the priority given to each category of priority needs.
3. Identify any obstacles to meeting underserved needs.
4. Identify specific long-term and short-term community development objectives (including economic development activities that create jobs), developed in accordance with the statutory goals described in section 24 CFR 91.1 and the primary objective of the CDBG program to provide decent housing and a suitable living environment and expand economic opportunities, principally for low- and moderate-income persons.

NOTE: Each specific objective developed to address a priority need, must be identified by number and contain proposed accomplishments, the time period (i.e., one, two, three, or more years), and annual program year numeric goals the jurisdiction hopes to achieve in quantitative terms, or in other measurable terms as identified and defined by the jurisdiction.

3-5 Year Strategic Plan Community Development response:

1. St. Clair County will continue, each year during the term of the Consolidated Plan, to provide CDBG funds to 20 to 25 municipalities and townships to make public facility improvements in low and low-moderate income areas. Grants will be provided to improve senior centers, make flood drain improvements, water and sewer improvements, street improvements, sidewalks and new fire equipment.
These activities are eligible for CDBG funding pursuant to 24 CFR 570.201(c).

More specifically, our highest priority non-housing community development needs for the 2010—2014 program years are shown on the table on the following page. The needs identified in the table are all considered high priorities.

ACTIVITY	CDBG ELIBILITY	MATRIX CODE	ACCOMPLISHMENT TYPE	5 YEAR GOAL
Flood Drain Improvements	§570.201(c)	03I	Public Facilities	20
Water/Sewer Improvements	§570.201(c)	03J	Public Facilities	35
Street Improvements	§570.201(c)	03K	Public Facilities	35
Sidewalks	§570.201(c)	03L	Public Facilities	5
Fire Stations/Equipment	§570.201(c)	03O	Public Facilities	5

2. The older, low-moderate income neighborhoods in St. Clair County's communities have need for public infrastructure improvements. This need is heightened in communities where the infrastructure is aging, especially beyond design life expectancy, and where the population and tax bases are declining. In addition some communities, especially in the western urbanized areas along the Mississippi River, are built upon flood plains protected by a system of drainage canals, ditches, and levees.

The continuing development of communities above the bluffs contributes to the increase in sedimentation build-up in the drainage system in and around the American Bottoms communities, which impacts the adequacy of storm water runoff. Most of these communities suffer from high ground water resulting in sanitary sewer breaks, road deterioration, and less desirable neighborhoods to live in. Some of them suffer from flooding during heavy rains when the drainage system fails.

The primary infrastructure problems include poor or inadequate storm drainage systems, sanitary sewers systems, streets and sidewalks and water delivery systems.

3. The primary obstacle to meeting underserved needs is the general lack of funding resources available to the public and private agencies who serve the needs of low- and moderate-income residents. The level of federal funding has declined while neither state nor local funds have been able to fill the gap, especially for non-housing needs. Between 2002 and 2008, the County's annual CDBG and HOME entitlement funds have been cut by 22% and 24% respectively. These cuts greatly affect our efforts to meet the needs identified in this consolidated plan. Local communities do not have the resources to address these needs adequately either. The needs are so great in these communities that HUD Entitlement funds alone, even leveraged with other resources are insufficient to reverse the decades of decline. Local governments have difficulty gaining approval to increase local taxes to make repairs or improvements to public facilities and infrastructure, let alone address affordable housing needs.

Vacant, derelict buildings are an obstacle to making suitable living environments available for low-moderate income households. They are public health and safety hazards that reduce property values, cause disinvestment to accelerate, and invite the nuisance behavior and criminal activity that make neighborhoods less desirable places in which to live.

And finally, local financial institutions are often unaware of the state and local programs that are available to businesses that locate in a tax increment financing district, a state enterprise zone or a rural area, which is an obstacle to the success of economic development programs.

4. Long Term Objectives:

- a. Increase coordination between the communities, and other Federal and State programs for local infrastructure development.
- b. Support local efforts towards better long range planning to resolve public facility problems, especially in areas plagued by constant flooding and sanitary sewer problems.
- c. Over the next five years, using CDBG assistance, complete 100 Public Facilities and Improvement Projects.

See Housing and Community Development Activities Table on Following Pages:

Only complete blue sections.

Jurisdiction	Needs	Current	Gap	5-Year Quantities										% of Goal	Priority Need: H, M, L	Address to Fund?	Fund Source		
				Year 1		Year 2		Year 3		Year 4		Year 5						Cumulative Goal	Actual
				Goal	Actual	Goal	Actual	Goal	Actual	Goal	Actual	Goal	Actual						
Housing and Community Development Activities																			
01 Acquisition of Real Property 570.201(a)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	N	
02 Disposition 570.201(b)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	N	
03 Public Facilities and Improvements (General) 570.201(c)	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Y	
03A Senior Centers 570.201(c)	5	0	5	1	0	0	0	0	0	0	0	0	0	0	0	0	0	Y	
03B Handicapped Centers 570.201(c)	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	N	
03C Homeless Facilities (not operating costs) 570.201(c)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	N	
03D Youth Centers 570.201(c)	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	N	
03E Neighborhood Facilities 570.201(c)	3	0	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Y	
03F Parks, Recreational Facilities 570.201(c)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	N	
03G Parking Facilities 570.201(c)	5	0	5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	N	
03H Solid Waste Disposal Improvements 570.201(c)	2	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Y	
03I Flood Drain Improvements 570.201(c)	10	0	10	2	0	0	0	0	0	0	0	0	0	0	0	0	0	Y	
03J Water/Sewer Improvements 570.201(c)	30	0	30	10	0	0	0	0	0	0	0	0	0	0	0	0	0	Y	
03K Street Improvements 570.201(c)	2	0	2	6	0	0	0	0	0	0	0	0	0	0	0	0	0	Y	
03L Sidewalks 570.201(c)	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Y	
03M Child Care Centers 570.201(c)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	N	
03N Tree Planting 570.201(c)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	N	
03O Fire Stations/Equipment 570.201(c)	5	0	5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Y	
03P Health Facilities 570.201(c)	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	N	
03Q Abused and Neglected Children Facilities 570.201(c)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	N	
03R Asbestos Removal 570.201(c)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	N	
03S Facilities for AIDS Patients (not operating costs) 570.201(c)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	N	
03T Operating Costs of Homeless/AIDS Patients Programs	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	N	
04 Clearance and Demolition 570.201(d)	2	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Y	
04A Clean-up of Contaminated Sites 570.201(d)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	N	

Only complete blue sections.

Jurisdiction	Needs	Current	Gap	5-Year Quantities										Priority Need: H, M, L	Dollars to Address	Plan to Fund? Y/N	Fund Source			
				Year 1		Year 2		Year 3		Year 4		Year 5						Cumulative Goal	Actual	% of Goal
				Goal	Actual	Goal	Actual	Goal	Actual	Goal	Actual	Goal	Actual							
16A Residential Historic Preservation 570.202(d)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	N		
16B Non-Residential Historic Preservation 570.202(d)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	N		
17A CI Land Acquisition/Disposition 570.203(e)	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	N		
17B CI Infrastructure Development 570.203(a)	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	N		
17C CI Building Acquisition, Construction, Rehabilitation 570.203(a)	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	N		
17D Other Commercial/Industrial Improvements 570.203(a)	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	N		
18A ED Direct Financial Assistance to For-Profits 570.203(b)	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	N		
18B ED Technical Assistance 570.203(b)	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	N		
18C Micro-Enterprise Assistance	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	N		
19A HOME Admin/Planning Costs of PJ (not part of 5% Ad	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	N		
19B HOME CHDO Operating Costs (not part of 5% Admin ca	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Y	HOME	
19C CDBG Non-Profit Organization Capacity Building	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	N		
19D CDBG Assistance to Institutions of Higher Education	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	N		
19E CDBG Operation and Repair of Foreclosed Property	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	N		
19F Planned Repayment of Section 108 Loan Principal	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	N		
19G Unplanned Repayment of Section 108 Loan Principal	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	N		
19H State CDBG Technical Assistance to Grantees	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	N		
20 Planning 570.205	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	N		
21A General Program Administration 570.206	5	0	5	1	0	0	0	0	0	0	0	0	0	0	0	0	0	Y	CDBG	
21B Indirect Costs 570.206	5	0	5	1	0	0	0	0	0	0	0	0	0	0	0	0	0	Y	CDBG	
21D Fair Housing Activities (subject to 20% Admin cap) 570.206	1	0	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	Y	CDBG	
21E Submissions or Applications for Federal Programs 570.206	5	0	5	1	0	0	0	0	0	0	0	0	0	0	0	0	0	Y	CDBG	
21F HOME Rental Subsidy Payments (subject to 5% cap)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	N		
21G HOME Security Deposits (subject to 5% cap)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	N		
21H HOME Admin/Planning Costs of PJ (subject to 5% cap)	5	0	5	1	0	0	0	0	0	0	0	0	0	0	0	0	0	Y	HOME	
21I HOME CHDO Operating Expenses (subject to 5% cap)	1	0	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	Y	HOME	
22 Unprogrammed Funds	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	N		
31J Facility based housing - development	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	N		
31K Facility based housing - operations	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	N		
31G Short term mortgage utility payments	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	N		
31F Tenant based rental assistance	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	N		
31E Supportive service	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	N		
31I Housing information services	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	N		
31H Resource identification	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	N		
31B Administration - grantee	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	N		
31D Administration - project sponsor	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	N		

Only complete blue sections.

Jurisdiction	Needs	Current	Gap	5-Year Quantities										% of Goal	Priority Need: H, M, L	Dollars to Address	Plan to Fund? Y/N	Fund Source			
				Year 1		Year 2		Year 3		Year 4		Year 5							Cumulative		
				Goal	Actual	Goal	Actual	Goal	Actual	Goal	Actual	Goal	Actual						Goal	Actual	
CDBG	Acquisition of existing rental units	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	L		N	
	Production of new rental units	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	L		N	
	Rehabilitation of existing rental units	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	L		N	
	Rental assistance	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	L		N	
	Acquisition of existing owner units	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	L		N	
	Production of new owner units	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	L		N	
	Rehabilitation of existing owner units	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	L		N	
	Homeownership assistance	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	H		Y	CDBG
	Acquisition of existing rental units	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	L		N	
	Production of new rental units	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	L		N	
HOME	Rehabilitation of existing rental units	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	L		N	
	Rental assistance	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	L		N	
	Acquisition of existing owner units	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	L		N	
	Production of new owner units	5	0	5	1	5	1	5	1	5	1	5	1	5	1	5	1	M		Y	HOME
	Rehabilitation of existing owner units	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	H		Y	HOME
	Homeownership assistance	60	0	60	20	60	20	60	20	60	20	60	20	60	20	60	20	H		Y	HOME
	Totals	292	0	292	73	292	73	292	73	292	73	292	73	292	73	292	73	0	0	0	0

Antipoverty Strategy (91.215 (h))

1. Describe the jurisdiction's goals, programs, and policies for reducing the number of poverty level families (as defined by the Office of Management and Budget and revised annually). In consultation with other appropriate public and private agencies, (i.e. TANF agency) state how the jurisdiction's goals, programs, and policies for producing and preserving affordable housing set forth in the housing component of the consolidated plan will be coordinated with other programs and services for which the jurisdiction is responsible.
2. Identify the extent to which this strategy will reduce (or assist in reducing) the number of poverty level families, taking into consideration factors over which the jurisdiction has control.

3-5 Year Strategic Plan Antipoverty Strategy response:

1. St. Clair County has a substantial number of families and individuals who live in poverty. While many factors related to poverty are beyond the control of County government, the County is committed to addressing poverty issues and improving the welfare and economic status of its residents wherever possible. Some of the services described in this plan are devoted primarily to helping those in poverty. Some, like Homeless Services, are basic elements of the "safety net" geared to those in most need. Others, like promotion of home ownership, job creation and education, are more fundamental to the long term reduction of poverty.

In Program Years 2010-2014 the County will undertake a number of initiatives that are consistent with the long-term approach to reducing poverty levels described above. The County will continue to allocate funding to public service activities through the CDBG program for the Housing Counseling and Assistance Center. Other CDBG and HOME funded activities will assist lower income persons through such activities as home repair, homeownership assistance, public facilities infrastructure, and a senior/disabled person home accessibility improvement program. All of these activities benefit lower income persons and serve to improve their economic status and well being. In addition, CDBG funds will be allocated for business development supported activities resulting in the creation or retention of jobs, a majority of which will be held by low and moderate income persons.

The County can most effectively fight poverty over the long term by:

- Promoting Economic Development, especially job intensive industries
 - Providing employment readiness and training services to those in need
 - Building the tax base so that basic County services and "safety net" services can be maintained
 - Helping low-income households purchase homes in neighborhoods where housing values are likely to increase
2. Unfortunately these efforts, backed by extremely limited funds, are unlikely to have a significant impact on the total number of poverty level families in St. Clair County. In 2008 the American Community Survey reported that

approximately 39,000 people, or 15% of all the people in the County, were in living poverty. Approximately 26 percent of children under 18, or 17,000 children, were below the poverty level, compared with 10% percent of people 65 years old and over, or 3000 people. Fourteen percent of all families, or approximately 9,500 families, had incomes below the poverty level and 40% of families with a female householder and no husband present, or approximately 7,500 families, had incomes below the poverty level.

Ultimately, with a County median household income of less than \$48,000 (according to the 2008 American Community Survey), compared to the FHFA SMSA median income of \$67,000, many St. Clair County families struggle to attain self-sufficiency. Nearly all Consolidated Plan funds are spent to benefit people who are clearly falling below the self-sufficiency standard. However, with limited funds, it is difficult to make significant measurable progress toward reducing poverty rates in the County by any standard.

Low Income Housing Tax Credit (LIHTC) Coordination (91.315 (k))

1. (States only) Describe the strategy to coordinate the Low-income Housing Tax Credit (LIHTC) with the development of housing that is affordable to low- and moderate-income families.

3-5 Year Strategic Plan LIHTC Coordination response: N/A

NON-HOMELESS SPECIAL NEEDS

NON-HOMELESS SPECIAL NEEDS

Specific Special Needs Objectives (91.215)

1. Describe the priorities and specific objectives the jurisdiction hopes to achieve over a specified time period.
2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the strategic plan.

3-5 Year Non-homeless Special Needs Analysis response:

1. Special needs persons generally face two key challenges: the challenge of finding quality affordable housing and the challenge of finding appropriate supportive services. St. Clair County's priorities focus on each of those challenges separately, so the objectives for affordable housing for special needs persons overlap with the objectives for affordable housing for very low, low, and moderate income residents, and the objectives for supportive services for special needs persons overlap with the objectives for supportive services for other at-risk populations.

Special needs persons often face the same sorts of housing challenges as very low, low- and moderate-income residents. The availability of quality affordable housing can give special needs persons the ability to focus their energy and resources on obtaining the supportive services they require. To meet the affordable housing needs of its Special Needs populations, St. Clair County has devised the following three priority housing strategies.

- Owner-Occupied Single-Family Home Rehabilitation
- Single-Family Home New Construction
- Homebuyer Assistance Program

Priority need-levels were established by determining the types of activities that can be carried out under each grant program:

- CDBG - Over the next three to five years, the County plans to continue using a portion of its CDBG funding to supplement the present owner-occupied Housing Rehabilitation Loan/Grant Program and the Emergency Repair Program. All program funds will benefit low-income residents of the County.
- HOME - Over the next three to five years, the County plans to continue using a portion of its HOME dollars to fund the present owner-occupied Housing Rehabilitation Program. The County will continue funding a Homebuyer Assistance Program and the construction of New Single Family Homes. All program funds will benefit the low-income residents of St. Clair County.

All eligible persons (i.e. elderly, special needs, homeless, small families and large families) throughout St. Clair County may seek assistance for any of the above mentioned programs. However the feasibility of the above programs are contingent on future funding.

Although special needs persons are generally not homeless, they do require some of the same sorts of supportive services that IGD coordinates through the Housing Counseling Assistance Center, the Homeless Action Council, and the St. Clair County Continuum of Care. Specifically, the following supportive service strategies will be of benefit to non-homeless special needs persons:

- Continue to maintain and utilize the Homeless Management Information System (HMIS) for tracking population and services, minimizing duplication of effort, and maximizing the distribution of homeless prevention funds to needy individuals and families. Despite the name, the HMIS tracks supportive services received by non-homeless persons and households who may be at risk for homelessness due to extenuating circumstances, such as disability, domestic violence, or substance abuse.
- Administer Low-Income Home Energy Assistance Program (LIHEAP) funding to assist low income households in paying home energy bills, in order to make housing temporarily more affordable.
- Utilize Community Services Block Grant (CSBG) funding to provide rental, deposit, and mortgage assistance.
- Partner with private nonprofits through the Housing Counseling Assistance Center and the Homeless Action Council to connect special needs population with services such as prescription assistance, meal assistance, and short term specialized care.

Priority need-levels were established by consulting with the individual non-profits that administer supportive service programs and by determining the types of activities eligible under the Community Services Block Grant (CSBG) program.

2. Through the Owner-Occupied Single-Family Home Rehabilitation Grant/Loan Program, the following needs will be addressed:
 - Improves the quality of life for low income persons by providing financial assistance for home repair, allowing the home to meet St. Clair County Housing Maintenance Standards;
 - Promotes neighborhood stabilization by allowing disabled persons to stay in familiar surroundings (their homes);
 - Stabilizes affordable housing stock in existing neighborhoods by mitigating the housing availability barrier;
 - Mitigates housing barriers to disabled persons;
 - Promotes neighborhood revitalization and enhancement;
 - Addresses underserved needs (gaps in services) to financially assist clients in their need to: (1) foster and maintain affordable housing (2) remove the barriers to affordable housing, by allowing low-moderate income citizens, who cannot afford home repairs, to remain in homes

that may otherwise deteriorate to level where the home is no longer habitable (3) fund activities needed to preserve affordable housing in older, poor communities;

- Reduces potential for slum and blight, reducing potential for urban sprawl.

Through Single-Family Home New Construction, the following needs will be addressed:

- Assist low to moderate-income County residents to improve their quality of life by subsidizing the cost of building a new home;
- Promote neighborhood revitalization and enhancement;
- Stabilize the affordable housing stock by mitigating the housing availability barrier;
- Reduce a possible poverty/income barrier by relaxing some of the stringent home buying requirements such as: credit, income, down payment, etc.;
- Remove communication barriers by continuing to utilize non-profit organizations (such as CHDOs) to provide housing.

Through the Homebuyer Assistance Program, the following needs are addressed:

- Assist low to moderate-income County resident to improve their quality of life by funding such cost as: closing costs and down payments;
- Promote neighborhood revitalization and enhancement by the promotion of homeownership;
- Stabilize the affordable housing stock by mitigating housing availability barriers;
- Reduce a possible poverty/income barrier by relaxing some of the stringent requirements such as: credit, income, down payment, etc.
- Remove communication barriers by continuing to utilize non-profits organizations and CHDOs to provide housing counseling and other related service to potential homeowners.

Through the utilization of the HMIS, the following needs are addressed:

- Coordinates a multitude of service providers
- Reduces unnecessary duplication of effort to utilize limited resources efficiently
- Prevents homelessness

Through the LIHEAP energy assistance program, the following needs are addressed:

- Makes housing more affordable on a short-term basis for special needs persons adjusting to new circumstances
- Promotes neighborhood stabilization and quality of life by allowing special needs persons to stay in familiar surroundings (their homes)

Through CSBG rental, deposit, and mortgage assistance, the following needs are addressed:

- Improves quality of life for special needs persons by making housing more affordable
- Prevents homelessness
- Promotes neighborhood stabilization by allowing special needs persons to stay in familiar surroundings (their homes)

Through partnership with private non-profits specializing in supportive services, the following needs are addressed:

- Leverages limited funding resources to serve a larger special needs population
- Reduces the burden on special needs persons by providing them with a single initial point of contact (IGD) in order to find a multitude of resources
- Fosters a spirit of collaboration and encourages shared goals among service providers

Non-homeless Special Needs (91.205 (d) and 91.210 (d)) Analysis (including HOPWA)

*Please also refer to the Non-homeless Special Needs Table in the Needs.xls workbook.

1. Estimate, to the extent practicable, the number of persons in various subpopulations that are not homeless but may require housing or supportive services, including the elderly, frail elderly, persons with disabilities (mental, physical, developmental, persons with HIV/AIDS and their families), persons with alcohol or other drug addiction, victims of domestic violence, and any other categories the jurisdiction may specify and describe their supportive housing needs. The jurisdiction can use the Non-Homeless Special Needs Table (formerly Table 1B) of their Consolidated Plan to help identify these needs.

*Note: HOPWA recipients must identify the size and characteristics of the population with HIV/AIDS and their families that will be served in the metropolitan area.

2. Identify the priority housing and supportive service needs of persons who are not homeless but may or may not require supportive housing, i.e., elderly, frail elderly, persons with disabilities (mental, physical, developmental, persons with HIV/AIDS and their families), persons with alcohol or other drug addiction by using the Non-homeless Special Needs Table.

3. Describe the basis for assigning the priority given to each category of priority needs.
4. Identify any obstacles to meeting underserved needs.
5. To the extent information is available, describe the facilities and services that assist persons who are not homeless but require supportive housing, and programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing.
6. If the jurisdiction plans to use HOME or other tenant based rental assistance to assist one or more of these subpopulations, it must justify the need for such assistance in the plan.

3-5 Year Non-homeless Special Needs Analysis response:

1. Some households with special needs only require housing or supportive services for a brief time period, and many never need assisted housing or supportive services, and instead are able to live with their families or seek market-rate private care. It is difficult to estimate how many people with special needs would benefit from increased affordable housing or supportive services. However, IGD is a key member of the Continuum of Care and therefore has knowledge of the frequency of requests from various special needs populations. Due to limited funding, IGD's first priority is to meet the needs of the non-homeless special needs persons actively seeking help: i.e., to solve the known problem. Each section below first gives an estimate of the entire number of persons or households in St. Clair County who are part of a particular subpopulation, and then gives IGD's estimate of the number of persons or households within that subpopulation known to have a current, unmet need. It is likely that the true need falls somewhere in between these two estimates, but data is not available on persons with unmet need who are not seeking help.

Elderly and Frail Elderly

St. Clair County has 19,954 elderly households, defined as one- or two-person households where one or both persons are 62 years or older. 16,167 are owner occupied households and 3,787 are renter occupied. Elderly renters frequently have a heavy or severe housing cost burdens. Approximately 47% of elderly renter households and 20% of elderly owner households have one or more housing problems. In contrast, for the population as a whole, 35% of renters and 18% of owners have one or more housing problems. The data indicate that elderly owners had more housing problems on a percentage basis than other owners.

IGD estimates that a total of 709 elderly households have a need for housing and supportive services, and that only 330 of these households are currently being served, leaving 379 elderly households with unmet need.

IGD estimates that a total of 390 frail elderly households have a need for housing and supportive services, and that only 30 of these households are currently being served, leaving 360 frail elderly households with unmet need.

Persons with Disabilities

The 2008 American Community Survey identifies approximately 33,584 individuals in St. Clair County with a disability, including 3,641 who are individuals under 18 year of age, 17,442 individuals between 18 and 64, and 12,501 individuals who are 65 or older. According to data from the *2008 Picture of Subsidized Households*, 13% of households living in subsidized housing units have at least one family member with some sort of disability.

IGD estimates that a total of 647 persons with severe mental illness have a need for housing and supportive services, and that only 372 of these persons are currently being served, leaving 275 persons with severe mental illness with unmet need.

IGD estimates that a total of 46 developmentally disabled persons have a need for housing and supportive services, and that only 26 of these persons are currently being served, leaving 20 developmentally disabled persons with unmet need.

IGD estimates that a total of 420 physically disabled persons have a need for housing and supportive services, and that only 242 of these persons are currently being served, leaving 178 physically disabled persons with unmet need.

Persons Diagnosed with AIDS or Related Diseases

The tables below show data from the Illinois Department of Public Health on the total number of persons with HIV or AIDS for the years 2006 through 2009. The East Side Health District serves the residents of Canteen Township, Centreville Township, East St. Louis Township and Stites Township. The St. Clair County Health Department reports HIV and AIDS cases for the remainder of the County. The total number of persons, the sum of all persons reported by the East Side Health District and the St. Clair County Health Department, covers St. Clair County in its entirety (including East St. Louis).

In 2009, there were a total of 268 persons with HIV and 274 persons with AIDS in St. Clair County. Not all persons with HIV/AIDS and their families necessarily have housing needs. Because approximately 23% of all households in the St. Clair County Participating Jurisdiction have one or more housing problems, we can assume that at least 23% of the 542 HIV/AIDS persons, or 125 persons, have one or more housing problems. Furthermore, the total number of persons with HIV or AIDS has increased slightly since 2006, so the demand for housing for HIV/AIDS and their families is likely to continue to increase over time.

HIV Cases

	2006	2007	2008	2009
East Side Health District	185	188	192	163
St. Clair County Health Department	97	106	115	105
St. Clair County Total	282	294	307	268

AIDS Cases

	2006	2007	2008	2009
East Side Health District	142	161	173	173
St. Clair County Health Department	76	80	87	101
St. Clair County Total	218	241	260	274

IGD estimates that a total of 52 persons with HIV/AIDS have a need for housing and supportive services, and that only 30 of these persons are currently being served, leaving 22 persons with HIV/AIDS with unmet need.

Persons with Alcoholism and Substance Abuse Problems

Alcohol and other drug abuse have significant influence on the health status of the general population. The Illinois Department of Health Behavioral Risk Factor Surveillance System estimates that during the 2007-2009 timeframe, 17.8% of St. Clair County adults were at risk for acute or binge drinking. Furthermore, St. Clair County police reported 2,730 drug arrests in 2008. The Midwest is also seeing higher instances of the manufacturing and use of crystal meth. The meth problem is growing in the Metropolitan Area and area law enforcement agencies are making progress in dealing with this problem. Comprehensive and accessible alcohol and other drug abuse treatment programs are essentially ensuring the effectiveness of public health interventions.

IGD estimates that a total of 129 persons with substance abuse problems have a need for housing and supportive services, and that only 74 of these persons are currently being served, leaving 55 persons with substance abuse problems with unmet need.

Victims of Domestic Violence

In 2008, there were 955 domestic crimes reported in St. Clair County. Reporting domestic violence is mandated by Chapter 20 of the Illinois Compiled Statutes, 2630/5.1. Domestic-related crimes are defined as crimes committed by family or household members, including spouses, former spouses, parents, children, stepchildren and other persons related by blood or marriage, persons who share or formerly shared a common dwelling, and persons who have or allegedly have a child in common. In the case of a high-risk adult with disabilities, family or household member includes any person who has the responsibility for a high-risk adult as a result of a family relationship or who has assumed responsibility for all or a portion of the care of a high-risk adult with disabilities voluntarily, or by express or implied contract, or court order. Data is available for the State of Illinois as a whole on what types of domestic crimes are most prevalent.

The majority - 67% of domestic crimes - fall into the category of assault and battery.

IGD does not have a reliable estimate of the number of victims of domestic violence. It is likely that by providing quality affordable housing in conjunction with the counseling services and short term shelter provided by private nonprofits, that the needs for this subpopulation can be met.

2. With the exception of public housing residents, which is a subpopulation being fully served by the existing housing and supportive services, IGD and partner Continuum of Care members view each of the subpopulations in the Non-Homeless Special Needs Table as high priority. Funding to meet these high priority needs, however, is extremely limited, and IGD is relying upon other Continuum of Care members to fund special needs housing and supportive services based on their own organizational capacities and priorities.
3. IGD is not directly funding the housing for non-homeless special needs patients. The St. Clair County participating jurisdiction focuses on using CDBG and HOME funding to serve the low income population as a whole through affordable housing production, rental, utility, and home mortgage down payment assistance for low income households, and public facilities projects located in low/mod areas of the County. In the "Funding Source" column of the Non-Homeless Special Needs Table, the funding source for each of the special needs subpopulations is "O" for "Other". Area Continuum of Care member nonprofits will be using separate funding sources to serve special needs populations, and therefore these nonprofits identified the priorities based on their own organizational capacity and priorities.
4. The primary obstacle to meeting all of the identified special needs is the general lack of funding resources available to the public and private agencies who serve these populations. The level of federal funding has declined while neither state nor local funds have been able to fill the gap, especially for non-housing needs. Sufficient funding is not available to fund new activities addressing underserved needs. Nevertheless, the County continues to urge its non-profit partners to secure other sources of funds.
5. A number of agencies and organizations in St. Clair County a variety of services for persons with special needs, including temporary shelter. They are listed below by service category.

Shelters

- Interfaith Partnership
- Violence Prevention Center of Southwestern Illinois
- Salvation Army
- Interfaith Residence
- Catholic Urban Programs (Holy Angels, motel vouchers)
- Dorris Helping Hand
- Catholic Services Center (Don Bosco Children's Center)

- Bethany Place
- Second Chance Shelter
- Family Living Center
- Opal's House
- Call for Help, Inc.
- Hoyleton Youth Center

Food and Nutritional Services

- American Red Cross
- Violence Prevention Center
- Salvation Army
- Urban League
- Cahokia Community Baskets
- Catholic Urban Programs
- St. Clair County Intergovernmental Grants Department
- Call for Help
- St. Matthews United Methodist Church - Belleville
- Lessie Bates Neighborhood House
- Dorris Helping Hand
- St. Luke's Catholic Church
- St. Paul's United Church of Christ - Belleville
- Bishop Cosgrove's Kitchen
- St. Clair County Veterans Assistance Commission
- Belleville Christian Center
- St. Peter's Cathedral
- St. Mark's Lutheran Church
- Freeburg Food Pantry
- Fairview Heights Food Pantry
- Many other smaller churches also operate food pantries

Clothing Distribution

- American Red Cross
- Salvation Army
- Catholic Urban Programs
- Lessie Bates Davis Neighborhood House

- St. Paul's United Church of Christ - Freeburg
- Metro-East Baptist Association
- St. Francis Thrift Shop
- St. Matthews United Methodist Church
- St. Vincent DePaul Distribution Association, Inc.
- Dorris Helping Hand
- Belleville Christian Center

Counseling Services

- American Red Cross
- Salvation Army
- Call for Help
- Catholic Urban Programs
- Metro-east Baptist Association
- Violence Prevention Center
- St. Clair County Specialized Living Center
- Children, Family and Youth Advocacy Council
- Chestnut Health Systems
- Lessie Bates Davis Neighborhood House
- Dorris Helping Hand
- St. Clair County Association Vocational Enterprise (SAVE)
- Center for Independent Living
- Comprehensive Mental Health Center
- St. Clair County Community Services Division
- Neighbors United for Progress
- Urban League of Metropolitan St. Louis
- St. Clair County Housing Counseling & Assistance Center
- CDBG Operations Corporation
- Land of Lincoln Legal Assistance
- Bethany Place
- Family Living Center
- Gateway Foundation

Services for Persons with Disabilities

- St. Clair County Specialized Living Center
- Children, Family and Youth Advocacy Council
- Chestnut Health Systems
- Comprehensive Mental Health Center
- Center for Independent Living
- St. Clair County Housing Authority
- Citizens for the Disabled
- St. Clair Associated Vocational Enterprises (SAVE)
- Living Independently Now Center (LINC)
- Bethany Place
- Interfaith Residence
- Gateway Foundation
- PSOP
- St. Clair County HIV/AIDS Consortium

Several of these facilities are specialized to serve specific special needs populations. Below are some examples of the types of organizations providing services and supportive housing to specific special needs populations. In addition, many of the facilities listed above serve all populations.

Elderly and Frail Elderly

A variety of assisted senior housing developments can be found throughout St. Clair County, including those operated by the St. Clair County Housing Authority. One example property is the Housing Authority's Bel-Plaza II Apartments in Belleville. Bel-Plaza II consists of 38 one-bedroom senior apartments that offer a host of features for the elderly including a telephone security system to allow visitors access through use of the telephone, elevator, community room with lounge area and kitchen facilities, and a service coordinator on-site to assist residents. Bel-Plaza II is located near both medical facilities and public transportation.

Persons with Disabilities

St. Clair County Specialized Living Center provides housing and services to adult men and women who are developmentally disabled, primarily mentally retarded, who may also be diagnosed as having cerebral palsy, epilepsy, autism, and other developmental disabilities. The Specialized Living Center provides or arranges for support services that include speech and hearing therapy, physical therapy, occupational therapy, activity therapy, social services, case coordination, and behavior modification. Medical services include twenty-four hour health care supervised by a registered nurse under the direction of a resident's personal physician.

Persons Diagnosed with AIDS or Related Diseases

Bethany Place is a community based AIDS service organization offering both supportive services for people living with AIDS and transitional housing for men living with HIV/AIDS. Services include health care, peer support, mental health services, food and nutrition services, confidential AIDS testing, case management, HIV/AIDS education, volunteer services, community outreach, prevention education, education programs for children and youth, and new transitional housing.

Persons with Alcoholism and Substance Abuse Problems

The Gateway Foundation Caseyville Treatment Center is a private, non-profit organization that provides a multitude of treatment modalities for chemically dependent individuals. Program services provided for adult clients include Social Setting Detoxification, short-term Residential Treatment (30 days), long-term Residential Treatment (up to 90 days), and Basic and Intensive Outpatient Programs.

Victims of Domestic Violence

The Violence Prevention Center of Southwestern Illinois works to eliminate domestic violence in individual lives and in society as a whole by providing comprehensive services to victims of family violence, focusing primarily on women, children, and the elderly. The Center provides a 24-hour crisis hotline, and a shelter for up to 28 battered women and their dependent children at a given time. Counseling and advocacy services include individual (children, youth, and adult) and group counseling, assistance obtaining orders of protections, and police advocacy in eight local law enforcement agencies. Prevention and education services are provided through seminars and training on issues about domestic violence.

Mental and physical health institutions in St. Clair County have discharge procedures designed to ensure that persons returning from these facilities have appropriate supportive housing arranged for before they are discharged in order to prevent homelessness. Organizations such as the IGD-administered Housing Counseling Assistance Center and the private non-profit Call for Help also have staff available to direct persons with special needs to the appropriate services through the St. Clair County Continuum of Care.

6. The jurisdiction has two programs that have the potential to assist tenants of rental housing with special needs. The Low-Income Home Energy Assistance Program (LIHEAP) assists low income households in paying home energy bills, in order to make housing temporarily more affordable. Community Services Block Grant (CSBG) funding provides rental, deposit, and mortgage assistance. However, while households with special needs are not excluded from taking advantage of short-term utility and rental assistance, neither of these programs are targeted to a specific special needs population. Instead, eligibility is based on income, with IGD's priority being to serve low income households regardless of special needs. Because IGD is a member of the St. Clair County Continuum of Care, IGD staff can focus on serving the low-income population, while effectively directing non-homeless special needs populations to other organizations better equipped to provide additional, specialized assistance.

Housing Opportunities for People with AIDS (HOPWA)

*Please also refer to the HOPWA Table in the Needs.xls workbook.

1. The Plan includes a description of the activities to be undertaken with its HOPWA Program funds to address priority unmet housing needs for the eligible population. Activities will assist persons who are not homeless but require supportive housing, such as efforts to prevent low-income individuals and families from becoming homeless and may address the housing needs of persons who are homeless in order to help homeless persons make the transition to permanent housing and independent living. The plan would identify any obstacles to meeting underserved needs and summarize the priorities and specific objectives, describing how funds made available will be used to address identified needs.
2. The Plan must establish annual HOPWA output goals for the planned number of households to be assisted during the year in: (1) short-term rent, mortgage and utility payments to avoid homelessness; (2) rental assistance programs; and (3) in housing facilities, such as community residences and SRO dwellings, where funds are used to develop and/or operate these facilities. The plan can also describe the special features or needs being addressed, such as support for persons who are homeless or chronically homeless. These outputs are to be used in connection with an assessment of client outcomes for achieving housing stability, reduced risks of homelessness and improved access to care.
3. For housing facility projects being developed, a target date for the completion of each development activity must be included and information on the continued use of these units for the eligible population based on their stewardship requirements (e.g. within the ten-year use periods for projects involving acquisition, new construction or substantial rehabilitation).
4. The Plan includes an explanation of how the funds will be allocated including a description of the geographic area in which assistance will be directed and the rationale for these geographic allocations and priorities. Include the name of each project sponsor, the zip code for the primary area(s) of planned activities, amounts committed to that sponsor, and whether the sponsor is a faith-based and/or grassroots organization.
5. The Plan describes the role of the lead jurisdiction in the eligible metropolitan statistical area (EMSA), involving (a) consultation to develop a metropolitan-wide strategy for addressing the needs of persons with HIV/AIDS and their families living throughout the EMSA with the other jurisdictions within the EMSA; (b) the standards and procedures to be used to monitor HOPWA Program activities in order to ensure compliance by project sponsors of the requirements of the program.
6. The Plan includes the certifications relevant to the HOPWA Program.

3-5 Year Strategic Plan HOPWA response: N/A

Specific HOPWA Objectives

1. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the strategic plan.

3-5 Year Specific HOPWA Objectives response: N/A

WORKSHEETS

Housing Market Analysis

Housing Needs Table

Continuum of Care Homeless Population and Subpopulations Chart

Housing and Community Development Activities

Non-Homeless Special Needs Including HOPWA

Jurisdiction

Housing Market Analysis

Complete cells in blue.

	Vacancy Rate	0 & 1 Bedroom	2 Bedrooms	3+ Bedroom	Total	Substandard Units
Housing Stock Inventory						
Affordability Mismatch						
Occupied Units: Renter		6918	11347	7941	26206	
Occupied Units: Owner		1793	13866	41948	57607	
Vacant Units: For Rent	8%	832	866	420	2118	
Vacant Units: For Sale	2%	97	340	666	1103	
Total Units Occupied & Vacant		9640	26419	50975	87034	0
Rents: <u>Applicable FMRs (in \$)</u>		547-593	737	948-1291		
Rent Affordable at 30% of 50% of MFI (in \$)						
Public Housing Units						
Occupied Units		353	313	311	977	0
Vacant Units		3	22	7	32	0
Total Units Occupied & Vacant		356	335	318	1009	0
Rehabilitation Needs (in \$)		6,467,000	6,468,500	6,468,500	19,404,000	

Part 4: Homeless Needs Table: Families	Needs	Currently Available	Gap	5-Year Quantities										Priority H, M, L	Plan to Fund?	Fund Source: CDBG, HOME, HOPWA, ESG, or Other			
				Year 1		Year 2		Year 3		Year 4		Year 5					Total		
				Goal	Complete	Goal	Complete	Goal	Complete	Goal	Complete	Goal	Complete				Goal	Actual	% of Goal
Beds	Emergency Shelters	74	66	8	10	0	0	0	0	0	0	0	0	0	0	0	0%	H	Other
	Transitional Housing	93	26	67	4	0	0	0	0	0	0	0	0	0	0	0	0%	M	Other
	Permanent Supportive Housing	117	67	50	3	0	0	0	0	0	0	0	0	0	0	0	0%	H	Other
	Total	284	159	125	17	0	0	0	0	0	0	0	0	0	0	0	0%		

Completing Part 1: Homeless Population. This must be completed using statistically reliable, unduplicated counts or estimates of homeless persons in sheltered and unsheltered locations at a one-day point in time. The counts must be from: (A) administrative records, (N) enumerations, (S) statistically reliable samples, or (E) estimates. The quality of the data presented in each box must be identified as: (A), (N), (S) or (E).

Completing Part 2: Homeless Subpopulations. This must be completed using statistically reliable, unduplicated counts or estimates of homeless persons in sheltered and unsheltered locations at a one-day point in time. The numbers must be from: (A) administrative records, (N) enumerations, (S) statistically reliable samples, or (E) estimates. The quality of the data presented in each box must be identified as: (A), (N), (S) or (E).

Sheltered Homeless. Count adults, children and youth residing in shelters for the homeless. "Shelters" include all emergency shelters and transitional shelters for the homeless, including domestic violence shelters, residential programs for runaway/homeless youth, and any hotel/motel/apartment voucher arrangements paid by a public/private agency because the person or family is homeless. Do not count: (1) persons who are living doubled up in conventional housing; (2) formerly homeless persons who are residing in Section 8 SRO, Shelter Plus Care, SHP permanent housing or other permanent housing units; (3) children or youth, who because of their own or a parent's homelessness or abandonment, now reside temporarily and for a short anticipated duration in hospitals, residential treatment facilities, emergency foster care, detention facilities and the like; and (4) adults living in mental health facilities, chemical dependency facilities, or criminal justice facilities.

Unsheltered Homeless. Count adults, children and youth sleeping in places not meant for human habitation. Places not meant for human habitation include streets, parks, alleys, parking ramps, parts of the highway system, transportation depots and other parts of transportation systems (e.g. subway tunnels, railroad car), all-night commercial establishments (e.g. movie theaters, laundromats, restaurants), abandoned buildings, building roofs or stairwells, chicken coops and other farm outbuildings, caves, campgrounds, vehicles, and other similar places.

Grantee Name: **Jurisdiction**

Non-Homeless Special Needs Including HOPWA

Housing Needed	Needs	Currently Available	GAP	3-5 Year Quantities												Total		Priority Need: H	Plan to Fund? Y	Fund Source: CD
				Year 1		Year 2		Year 3		Year 4*		Year 5*		Goal	Actual	% of Goal				
				Goal	Complete	Goal	Complete	Goal	Complete	Goal	Complete	Goal	Complete							
52. Elderly	709	330	379	50	0	0	0	0	0	0	0	0	0	0	50	0	0%	H	N	O
53. Frail Elderly	390	30	360	50	0	0	0	0	0	0	0	0	0	0	50	0	0%	H	N	O
54. Persons w/ Severe Mental Illness	647	372	275	100	0	0	0	0	0	0	0	0	0	100	0	0%	H	N	O	
55. Developmentally Disabled	46	26	20	5	0	0	0	0	0	0	0	0	0	5	0	0%	M	N	O	
56. Physically Disabled	420	242	178	75	0	0	0	0	0	0	0	0	0	75	0	0%	H	N	O	
57. Alcohol/Other Drug Addicted	129	74	55	60	0	0	0	0	0	0	0	0	0	60	0	0%	H	N	O	
58. Persons w/ HIV/AIDS & their families	52	30	22	10	0	0	0	0	0	0	0	0	0	10	0	0%	M	N	O	
59. Public Housing Residents	735	735	0	0	0	0	0	0	0	0	0	0	0	0	0	###	L	N	O	
Total	3128	1839	1289	350	0	0	0	0	0	0	0	0	0	350	0	0%				
Housing Needed																				
60. Elderly	709	330	379	50	0	0	0	0	0	0	0	0	0	50	0	0%	H	N	O	
61. Frail Elderly	390	30	360	50	0	0	0	0	0	0	0	0	0	50	0	0%	H	N	O	
62. Persons w/ Severe Mental Illness	647	372	275	100	0	0	0	0	0	0	0	0	0	100	0	0%	H	N	O	
63. Developmentally Disabled	46	26	20	5	0	0	0	0	0	0	0	0	0	5	0	0%	M	N	O	
64. Physically Disabled	420	242	178	75	0	0	0	0	0	0	0	0	0	75	0	0%	H	N	O	
65. Alcohol/Other Drug Addicted	129	74	55	60	0	0	0	0	0	0	0	0	0	60	0	0%	H	N	O	
66. Persons w/ HIV/AIDS & their families	52	30	22	10	0	0	0	0	0	0	0	0	0	10	0	0%	M	N	O	
67. Public Housing Residents	735	735	0	0	0	0	0	0	0	0	0	0	0	0	0	###	L	N	O	
Total	3128	1839	1289	350	0	0	0	0	0	0	0	0	0	350	0	0%				
Supportive Services Needed																				

SUMMARY OF SPECIFIC
ANNUAL OBJECTIVES



Summary of Specific Annual Objectives

Specific Obj. #	Outcome/Objective Specific Annual Objectives	Sources of Funds	Performance Indicators	Year	Expected Number	Actual Number	Percent Completed	
DH-1 Availability/Accessibility of Decent Housing								
DH-1 (1) 22, 29	Make decent housing more accessible for elderly and disabled homeowners by assisting them to make accessibility improvements.	CDBG	Number of housing units made accessible for elderly and people with disabilities.	2010	4		0%	
				2011	4		0%	
		Source of Funds #2		2012	4		0%	
				2013	4		0%	
		Source of Funds #3		2014	4		0%	
		MULTI-YEAR GOAL				20	0	0%
		Source of Funds #1	Number of households provided with housing counseling services.	2010	50		0%	
				2011	50		0%	
		Source of Funds #2		2012	45		0%	
		2013		45		0%		
	Source of Funds #3	2014		45		0%		
	MULTI-YEAR GOAL				235	0	0%	
	Make decent housing more available to people who are homeless or at risk of becoming homeless by providing housing counseling and education services to them.	Source of Funds #1	Performance Indicator #3	2010			#DIV/0!	
				2011			#DIV/0!	
		Source of Funds #2		2012			#DIV/0!	
		2013				#DIV/0!		
Source of Funds #3		2014				#DIV/0!		
MULTI-YEAR GOAL					0	#DIV/0!		



Summary of Specific Annual Objectives

Specific Obj. #	Outcome/Objective Specific Annual Objectives	Sources of Funds	Performance Indicators	Year	Expected Number	Actual Number	Percent Completed
DH-2 Affordability of Decent Housing							
25, 26	Make decent housing more affordable to low- and moderate-income households by providing financing mechanisms for the development of new low-moderate income affordable homeowner housing.	HOME	Number of new affordable homes built and sold to low-moderate income homebuyers.	2010	1		0%
		Source of Funds #2		2011	1		0%
		Source of Funds #3		2012	1		0%
				2013	1		0%
				2014	1		0%
		MULTI-YEAR GOAL				5	0
	Make decent housing more affordable to low- and moderate-income households by providing them with downpayment and closing cost assistance to enable them to purchase an affordable home.	HOME	Number of households provided with homebuyer assistance.	2010	20		0%
		Source of Funds #2		2011	20		0%
		Source of Funds #3		2012	20		0%
				2013	20		0%
				2014	20		0%
		MULTI-YEAR GOAL				100	0
		Source of Funds #1	Performance Indicator #3	2010			#DIV/0!
		Source of Funds #2		2011			#DIV/0!
		Source of Funds #3		2012			#DIV/0!
		2013				#DIV/0!	
		2014				#DIV/0!	
MULTI-YEAR GOAL					0	#DIV/0!	



Summary of Specific Annual Objectives

Specific Obj. #	Outcome/Objective Specific Annual Objectives	Sources of Funds	Performance Indicators	Year	Expected Number	Actual Number	Percent Completed	
DH-3 Sustainability of Decent Housing								
DH-3 (1) 21, 23	Sustain decent housing by assisting low and moderate-income homeowners in making improvements and repairs to their homes to make them safer, compliant with local building codes and lead safe.	CDBG	Number of housing units repaired.	2010	17		0%	
				2011	17		0%	
		HOME		2012	17		0%	
				2013	17		0%	
		Source of Funds #3		2014	17		0%	
		MULTI-YEAR GOAL				85	0	0%
			CDBG	Number of housing units repaired.	2010	4		0%
					2011	4		0%
		Source of Funds #2	2012		4		0%	
		2013	4			0%		
	Source of Funds #3	2014	4			0%		
	MULTI-YEAR GOAL				20	0	0%	
	Sustain decent housing by assisting low- and moderate-income homeowners in making emergency repairs.	Source of Funds #1	Performance Indicator #3	2010			#DIV/0!	
				2011			#DIV/0!	
		Source of Funds #2		2012			#DIV/0!	
		2013				#DIV/0!		
Source of Funds #3		2014				#DIV/0!		
MULTI-YEAR GOAL					0	#DIV/0!		



Summary of Specific Annual Objectives

Specific Obj. #	Outcome/Objective Specific Annual Objectives	Sources of Funds	Performance Indicators	Year	Expected Number	Actual Number	Percent Completed	
SL-1 Availability/Accessibility of Suitable Living Environment								
SL-1 (1) 1-20, 30	Make a suitable living environment more accessible and available to low- and moderate-income people by assisting with improvements to senior, handicapped and youth centers, neighborhood facilities, parking facilities, solid waste disposal, flood drainage, water and sewer systems, streets, sidewalks, fire stations and equipment, and health facilities in and serving low-moderate income areas.	CDBG	Number of public facility and improvement projects completed.	2010	20		0%	
				2011	20		0%	
		Source of Funds #2		2012	20		0%	
				2013	20		0%	
		Source of Funds #3		2014	20		0%	
		MULTI-YEAR GOAL				100	0	0%
			CDBG	Number of buildings demolished.	2010	4		0%
					2011	4		0%
		Source of Funds #2	2012		4		0%	
					2013	4		0%
	Source of Funds #3	2014	4			0%		
	MULTI-YEAR GOAL				20	0	0%	
	Make a suitable living environment more accessible and available by demolishing unsafe vacant and deteriorated structures.	Source of Funds #1	Performance Indicator #3	2010			#DIV/0!	
				2011			#DIV/0!	
		Source of Funds #2		2012			#DIV/0!	
		2013				#DIV/0!		
Source of Funds #3		2014				#DIV/0!		
MULTI-YEAR GOAL					0	#DIV/0!		



Summary of Specific Annual Objectives

Specific Obj. #	Outcome/Objective Specific Annual Objectives	Sources of Funds	Performance Indicators	Year	Expected Number	Actual Number	Percent Completed		
EO-1 Availability/Accessibility of Economic Opportunity									
EO-1 (1) 27	Improve/increase the availability/accessibility of economic opportunities through activities that create jobs and increase the County's tax base including land assembly, site preparation, business loans, business marketing, technical assistance and business support programs. Specific Annual Objective	CDBG	Number of jobs created or retained for low-moderate income people.	2010	10		0%		
				2011	10		0%		
		Source of Funds #2		2012	10		0%		
				2013	10		0%		
		Source of Funds #3		2014	10		0%		
		MULTI-YEAR GOAL					50	0	0%
		Source of Funds #1	Performance Indicator #2	2010			#DIV/0!		
				2011			#DIV/0!		
		Source of Funds #2		2012			#DIV/0!		
				2013			#DIV/0!		
		Source of Funds #3		2014			#DIV/0!		
		MULTI-YEAR GOAL						0	#DIV/0!
		Source of Funds #1	Performance Indicator #3	2010			#DIV/0!		
				2011			#DIV/0!		
		Source of Funds #2		2012			#DIV/0!		
				2013			#DIV/0!		
		Source of Funds #3		2014			#DIV/0!		
		MULTI-YEAR GOAL						0	#DIV/0!

STANDARD FORM 424



SF 424

The SF 424 is part of the CPMP Annual Action Plan. SF 424 form fields are included in this document. Grantee information is linked from the 1CPMP.xls document of the CPMP tool.

SF 424

Complete the fillable fields (blue cells) in the table below. The other items are pre-filled with values from the Grantee Information Worksheet.

Date Submitted 8/17/10		Type of Submission	
Date Received by state	State Identifier	Application	Pre-application
Date Received by HUD	Federal Identifier	<input type="checkbox"/> Construction	<input type="checkbox"/> Construction
		<input checked="" type="checkbox"/> Non Construction	<input type="checkbox"/> Non Construction
Applicant Information			
Jurisdiction St. Clair County		UOG Code IL179163 ST. CLAIR COUNTY	
#19 Public Square		Organizational DUNS #115675738	
Suite 200		Organizational Unit – St. Clair County	
Belleville	Illinois	Department – Intergovernmental Grants Department	
62220	Country U.S.A.	Division – Community Development	
Employer Identification Number (EIN):		County – St. Clair County	
37-6001924		Program Year Start Date (10/01/10)	
Applicant Type:		Specify Other Type if necessary:	
Local Government: County		Specify Other Type	
Program Funding		U.S. Department of Housing and Urban Development	
Catalogue of Federal Domestic Assistance Numbers; Descriptive Title of Applicant Project(s); Areas Affected by Project(s) (cities, Counties, localities etc.); Estimated Funding			
Community Development Block Grant		14.218 Entitlement Grant	
CDBG Project Titles Community Development Block Grant Annual Action Plan		Description of Areas Affected by CDBG Project(s): St. Clair County excluding the cities of East St. Louis, Madison, Collinsville, and Scott Air Force Base	
\$CDBG Grant Amount \$ 2,368,251	\$Additional HUD Grant(s) Leveraged	Describe	
\$Additional Federal Funds Leveraged		\$Additional State Funds Leveraged	
\$Locally Leveraged Funds \$1,119,339 (Public Facilities projects – committed by communities)		\$Grantee Funds Leveraged	
\$Anticipated Program Income \$165,625		Other (Describe)	
Total Funds Leveraged for CDBG-based Project(s) \$1,284,964 (Locally leveraged funds + anticipated program income)			
Home Investment Partnerships Program		14.239 HOME	
HOME Project Titles HOME Program Annual Action Plan		Description of Areas Affected by HOME Project(s) St. Clair County excluding the cities of East St. Louis, Madison, Collinsville, and Scott Air Force Base	
\$HOME Grant Amount \$1,043,485	\$Additional HUD Grant(s) Leveraged	Describe \$300,000 IHDA Homebuyer Assistance	

\$Additional Federal Funds Leveraged		\$Additional State Funds Leveraged	
\$Locally Leveraged Funds		\$Grantee Funds Leveraged	
\$Anticipated Program Income \$193,553		Other (Describe)	
Total Funds Leveraged for HOME-based Project(s) \$493,553 (IHDA Homebuyer Assistance + anticipated program income)			
Housing Opportunities for People with AIDS – The County received no HOPWA funds		14.241 HOPWA	
HOPWA Project Titles		Description of Areas Affected by HOPWA Project(s)	
\$HOPWA Grant Amount	\$Additional HUD Grant(s) Leveraged	Describe	
\$Additional Federal Funds Leveraged		\$Additional State Funds Leveraged	
\$Locally Leveraged Funds		\$Grantee Funds Leveraged	
\$Anticipated Program Income		Other (Describe)	
Total Funds Leveraged for HOPWA-based Project(s)			
Emergency Shelter Grants Program – The County received no ESG funds		14.231 ESG	
ESG Project Titles		Description of Areas Affected by ESG Project(s)	
\$ESG Grant Amount	\$Additional HUD Grant(s) Leveraged	Describe	
\$Additional Federal Funds Leveraged		\$Additional State Funds Leveraged	
\$Locally Leveraged Funds		\$Grantee Funds Leveraged	
\$Anticipated Program Income		Other (Describe)	
Total Funds Leveraged for ESG-based Project(s)			
Congressional Districts of:		Is application subject to review by state Executive Order 12372 Process?	
Applicant Districts 12	Project Districts 12		
Is the applicant delinquent on any federal debt? If "Yes" please include an additional document explaining the situation.		<input checked="" type="checkbox"/> Yes	This application was made available to the state EO 12372 process for review on DATE
		<input type="checkbox"/> No	Program is not covered by EO 12372
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> N/A	Program has not been selected by the state for review

Person to be contacted regarding this application		
Mark	A.	Kern
Chairman, St. Clair County Board	618-277-6790 ext 3212	Fax – 618-236-1190
eMail vincek@co.st-clair.il.us	Grantee Website www.co.st-clair.il.us	Other Contact: Vince Kwiatkowski
Signature of Authorized Representative 		Date Signed 08/12/10

FIRST PROGRAM YEAR
ACTION PLAN



First Program Year Action Plan

The CPMP First Annual Action Plan includes the [SF 424](#) and Narrative Responses to Action Plan questions that CDBG, HOME, HOPWA, and ESG grantees must respond to each year in order to be compliant with the Consolidated Planning Regulations. The Executive Summary narratives are optional.

Narrative Responses

GENERAL

Executive Summary

The Executive Summary is required. Include the objectives and outcomes identified in the plan and an evaluation of past performance.

Program Year 1 Action Plan Executive Summary:

The Year 1 Action Plan covers the period beginning October 1, 2010 and ending September 30, 2011. The programs and activities described in this Action Plan are intended to primarily benefit low- and moderate-income residents of St. Clair County, neighborhoods with high concentrations of low- and moderate-income residents, other county residents and neighborhoods and the through the prevention and/or elimination of slums and blight. Funds will be distributed to eligible activities throughout St. Clair County. The County also uses this Action Plan to coordinate with other federal and state grant programs and local initiatives.

The 2010 Action Plan is the product of extensive public outreach, multiple public hearings, and consultation with dozens of agencies, groups, and organizations involved in the development of affordable housing, creation of job opportunities for low- and moderate-income residents, and/or provision of services to children, elderly persons, persons with disabilities and homeless persons. A complete draft of this plan was made available for public review and comment for a 30-day period beginning July 14, 2010. The availability of both the draft plan and the final plan is advertised in the local newspaper and the complete documents are available for review on the County's website:

(www.co.st-clair.il.us/Departments/Intergovernmental+Grants/default.htm)

and in print form at the offices of the St. Clair County Intergovernmental Grants Department (19 Public Square, Suite 200, Belleville, Illinois 62220-1624), at the County Courthouse and at various public libraries, senior/community centers, and village/city halls throughout the County. It will also be made available in a form accessible to people with impaired vision and to non-English speaking residents upon request.

St. Clair County currently receives annual funding from two programs administered at the federal level by the U.S. Department of Housing and Urban Development. They are:

- Community Development Block Grant (CDBG)
- Home Investment Partnerships (HOME)

The specific objectives that will be addressed by the 2010 Annual Plan are:

Objective 1: Create a Suitable Living Environment

Outcome: Availability/Accessibility of Suitable Living Environment

- 20 public facility and improvement projects in and serving low- and moderate income people completed, including improvements to senior, handicapped or youth centers, neighborhood facilities, parking facilities, solid waste disposal, flood drainage, water and sewer systems, streets, sidewalks, fire stations and equipment, and health facilities.
- 4 vacant and deteriorated buildings demolished.

Objective 2: Provide Decent Affordable Housing

Outcome: Availability/Accessibility of Decent Housing

- 4 homes made accessible for elderly and disabled homeowners
- 50 homeless or at risk of becoming homeless households provided with housing counseling and education services

Outcome: Affordability of Decent Housing

- Construction of 1 new home which are affordable to low-moderate income households.
- Purchase of affordable homes by 20 low- and moderate-income households provided with downpayment and losing cost assistance.

Outcome: Sustainability of Decent Housing

- 17 homes owned by low- and moderate-income households improved and repaired to make them safer, compliant with local building codes and lead safe.
- Emergency home repairs made to 4 homes owned by low- and moderate- income households.

Objective 3: Create Economic Opportunities

Outcome: Availability/Accessibility of Economic Opportunity

- 10 jobs created or retained for low- and moderate-income people.

Available Funds

The priorities and goals outlined in the 2010 Annual Plan are based on the 2010 program year budget that appears on the following page.

PY 2010 CDBG	\$2,368,251
	Belleville \$797,341
	St. Clair County \$1,570,910
Sub-Grantees for Capital Improvements	
Public Facility Grants	\$1,593,963.00
Public Services	\$0.00
Public Facility Activity Delivery	\$97,000.00
Demolition/Land Clearance	\$0.00
Subtotal	\$1,690,963.00
St. Clair County Housing Activities (County Wide)	
Housing Rehabilitation Grants	\$83,051.00
Housing Accessibility Grants	\$12,000.00
Activity Delivery	\$58,587.00
Housing Repairs with Lead Hazard Control	\$0.00
Emergency Housing Repairs	\$50,000.00
Subtotal	\$203,638.00
St. Clair County (Administration/Planning)	
	\$473,650.00
Subtotal	\$473,650.00
Total PY 2010 CDBG	
	\$2,368,251.00
Reprogrammed CDBG Funds	
Public Services—Housing Counseling Assistance Center	\$20,000.00
Demolition	\$40,000.00
Subtotal	\$60,000.00
Program Income Expected PY 2010	
Home Loan Program Income	\$193,552.70
CDBG Rehabilitation Revolving Loan	\$756.15
Economic Development Revolving Loan	\$164,869.09
Subtotal	\$359,177.94
PY 2010 HOME	
Affordable Housing Development	\$100,000.00
Homebuyer Assistance	\$100,000.00
Homebuyer Assistance Activity Delivery	\$37,000.00
Housing Rehabilitation Grant	\$472,614.00
Housing Rehabilitation Grant Activity Delivery	\$73,000.00
CHDO	\$156,523.00
Administration	\$104,348.00
Subtotal	\$1,043,485.00
Total HOME	
	\$1,043,485.00
Grand Total	
	\$3,830,913.94

Program Priorities

Infrastructure improvements will remain a primary focus of the CDBG program and maintaining single-family homeownership housing will remain the focus of the HOME program.

In addition to using the limited amounts of CDBG and HOME funds available, the County will continue to use other federal, state and local economic development incentives, including Tax Increment Financing and a variety of state and federal tax credits, for economic and residential development purposes.

To address the priorities, concerns and availability of funding, St. Clair County proposes the following allocations for Program Year 2010:

	CDBG	HOME	TOTAL
Public Facilities and Improvements	\$1,593,963	\$0	\$1,593,963
Public Facilities and Improvements Program Delivery	\$97,000	\$0	\$97,000
Subtotal	\$1,690,963	\$0	\$1,690,963
Rehab—Single-Family Unit Residential	\$145,807	\$666,167	\$811,974
Rehab Admin	\$58,587	\$73,000	\$131,587
Construction of Housing	\$0	\$256,523	\$256,523
Direct Homeownership Assistance	\$0	\$100,000	\$100,000
Homeownership Assistance Program Delivery	\$0	\$37,000	\$37,000
Subtotal	\$204,394	\$1,132,690	\$1,337,084
Economic Development—Direct Financial Assistance to For-Profits	\$164,869	\$0	\$164,869
Subtotal	\$164,869	\$0	\$164,869
General Program Administration	570,650	\$104,348	\$674,998
Subtotal	\$473,650	\$104,348	\$577,998
2010 Entitlement & Program Income	\$2,533,876	\$1,237,038	\$3,770,914
Reprogrammed CDBG Funds			
Public Services	\$20,000	\$0	\$20,000
Clearance and Demolition	\$40,000	\$0	\$40,000
Subtotal	\$60,000	\$0	\$60,000
TOTAL 2010 PROGRAM YEAR	\$2,593,876	\$1,237,038	\$3,830,914

PY 2010 Public Facilities Projects

Community	Project	Award
Alorton	Street Reconstruction—McCausland Avenue	\$80,000.00
Belleville	Resurface/Reconstruct 21 st , 22 nd & Washington	\$478,404.60
Brooklyn	Sanitary Sewer Lining—Washington, Canal, Monroe...	\$80,000.00
Cahokia	Sanitary Sewer Replacement—St. Henry, Gregory, St. Margaret	\$64,000.00
Canteen Township	Install Liner on Sanitary Sewer Wet Well	\$64,000.00
Caseyville Township	Sanitary Sewer Collection System—Pasadena Dr. & Pine Trail	\$64,000.00
Centreville	Drainage/road Improvements—52 nd , 53 rd , 54 th , 55 th , Market	\$60,000.00
East Carondelet	Storm Water Pump Station Improvements—5 th Street	\$42,400.00
Fairmont City	Rehabilitation Sewer trunk Line—Cookson Road	\$64,000.00
Fairview Heights	Street Improvements—Third Avenue	\$60,000.00
Freeburg Township	Remove & Replace Vestibule of the Township Hall	\$64,000.00
Lenzburg	Sanitary Sewer Main Replacement—Elm and Locust Streets	\$56,160.00
Marissa	Replace Sanitary Sewer—Park Street	\$64,000.00
Millstadt Township	Install Emergency Phone/Alarm in Elevator—S. Jefferson	\$2,197.80
New Athens	Waterline Replacement—S. Johnson Street	\$42,800.00
O'Fallon Township	Storm Water Drainage—Behrens and Carson Drive	\$60,000.00
St. Clair Township	Street/Curb/Gutter Improvements-East Main Street	\$60,000.00
Shiloh	Construct Curb and Gutter Storm Sewer—High, Oak, Church	\$60,000.00
Swansea	Sewer Line Slip Lining—Penrose Dr., Kenwood Dr...	\$48,000.00
Washington Park	Street/Drainage Improvements—Westmoreland, Hallows...	\$80,000.00
		\$1,593,962.40

Evaluation of Past Performance

St. Clair County has consistently carried out the priorities and objectives identified in its current Consolidated Plan (2005—2009) and continued to do so in its most recently completed program year ending on September 30, 2009. Identified priorities and major initiatives undertaken to address them were:

Affordable Housing Needs of Low and Moderate-Income Households:

1. Homebuyer assistance and counseling
2. Single-family home rehabilitation
3. Emergency home repair
4. Single-family home accessibility improvements for elderly and disabled homeowners
5. Construction of single-family homes
6. Construction of multi-family rental units

Our performance as of the end of year four of the current Consolidated Plan period was consistent with these priorities. Our goals were to:

1. Provide assistance to 83 eligible first-time low- and moderate-income households to purchase decent, safe, and sanitary housing
2. Make improvements and repairs to 63 single-family homes to bring them up to building code standards
3. Provide 6 emergency home repairs to single-family homes
4. Provide accessibility improvements to 4 homes owned by elderly and disabled homeowners

5. Complete construction and sale of 8 affordable single-family homes
6. Complete construction of 10 multifamily rental units

By the end of year four, our CDBG and HOME programs actually:

1. Provided downpayment and closing cost assistance to allow 79 low- and moderate income households purchase single-family homes
2. Made improvements and repairs to 38 single-family homes
3. Made emergency home repairs to 16 single-family homes
4. Made accessibility improvements to 4 homes owned by disabled homeowners
5. Completed construction of six affordable single-family homes
6. Construction of 48 multifamily rental units for low-income seniors, of which 2 are affordable HOME-assisted units, is nearing completion

The County is on track to meet its Consolidated Plan goals for affordable housing needs. Staff has reviewed ways to increase participation in the home repair program, including streamlining the application process and automating the inspection write-ups.

Other Housing Related Issues

- Make single- and multifamily homes lead-safe

Our performance as of the end of year four of the current Consolidated Plan period was consistent with this priority. Our goal was to:

- Make 180 single- and multifamily homes lead-safe

By the end of year four, our CDBG and Lead Hazard Control programs actually:

- Made 184 single- and multifamily homes lead-safe

The County exceeded its Consolidated Plan goal for lead-safe housing needs.

Housing and Supportive Service Needs of Homeless/Chronically Homeless

1. Housing Counseling and Assistance Center (HCAC) and Homeless Action Council (HAC) participation in Continuum of Care Grant application and administration process;
2. Coordination between the Community Development and Community Services Divisions of IGD

Our performance as of the end of year four of the current Consolidated Plan period was consistent with this priority. In program year four:

- The St. Clair County IGD Community Action Agency, Community Services Division's Emergency Crisis Intervention Program assisted 1,896 people (749 households)

- The Community services Division's Emergency Food and Shelter Program assisted in preventing homelessness by providing 68 households with utility assistance

Public Facilities/Infrastructure/Demolition

1. Public facilities and improvements
2. Building demolition

Our performance as of the end of year four of the current Consolidated Plan period was consistent with this priority. Our goal was to:

1. Complete 21 public facility and improvement projects in 18 months
2. Demolish 6 derelict houses

By the end of year four, our CDBG program actually:

1. Completed 16 public facilities and improvements projects
2. No structures have been demolished

The County is on track to meet its Consolidated Plan goals for public facilities and improvements. Infrastructure improvement project completion dates often extend past the end of the program year because of poor weather, inability to secure building materials, inability to secure easements, or annual winter asphalt plant shut-downs. Although no structures have been demolished yet, funds have been committed to demolish 6 structures in Centreville Township; a contract has been executed with the Township; a list of potential demolition sites has been completed; and environmental review has been completed.

Economic Development

- Low-interest loans to businesses for the purpose of job retention and creation

Our performance as of the end of year four of the current Consolidated Plan period was consistent with this priority. Our goal was to:

- Create or retain permanent jobs, 51% of which to be filled by low- and moderate-income people

By the end of year four, our CDBG program actually:

- 17 jobs retained, 10 filled by low- and moderate-income people

The County is meeting its Consolidated Plan goals for economic development.

General Questions

1. Describe the geographic areas of the jurisdiction (including areas of low income families and/or racial/minority concentration) in which assistance will be directed during the next year. Where appropriate, the jurisdiction should estimate the percentage of funds the jurisdiction plans to dedicate to target areas.

2. Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA) (91.215(a)(1)) during the next year and the rationale for assigning the priorities.
3. Describe actions that will take place during the next year to address obstacles to meeting underserved needs.
4. Identify the federal, state, and local resources expected to be made available to address the needs identified in the plan. Federal resources should include Section 8 funds made available to the jurisdiction, Low-Income Housing Tax Credits, and competitive McKinney-Vento Homeless Assistance Act funds expected to be available to address priority needs and specific objectives identified in the strategic plan.

Program Year 1 Action Plan General Questions response:

1. St. Clair County is located along the Mississippi River in southwestern Illinois. It is one of two urban counties that are part of the St. Louis, Missouri Metropolitan Area. The County includes every conceivable land use, ranging from agricultural to suburban to urban. This Plan covers the entire County, with the exception of Scott Air Force Base and the City of East St. Louis, Illinois (which, as an entitlement community, is responsible for its own Consolidated Plan and related activities carried out in its jurisdiction.)

There are sharp contrasts in the economic status of St. Clair County residents. Communities in the American Bottoms have widespread poverty with accompanying blight and abandonment, while those on the bluffs, such as Belleville, Fairview Heights, and O'Fallon, have extensive residential and commercial development. Eastern and southern portions of the County are essentially rural in character. Residential opportunities differ extensively, from peaceful wooded countryside homes that are beautifully landscaped, to dilapidated unsafe buildings located in areas with significant infrastructure problems.

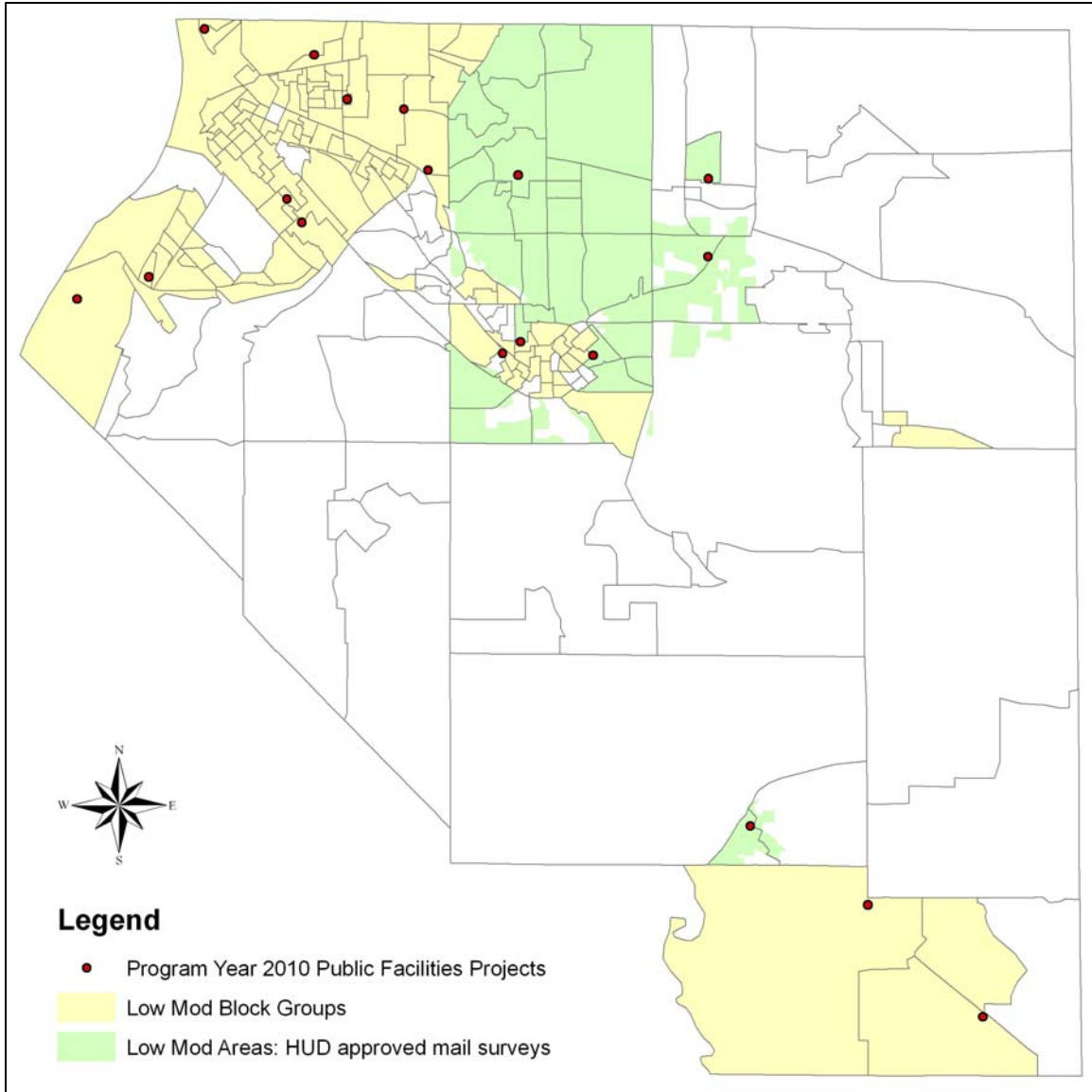
The American Bottoms communities have become economically distressed over the past 50 years as more affluent residents moved from the bottoms to the bluffs and to nearby Missouri communities. The African-American population is mostly concentrated in the American Bottoms in and around East St. Louis and collar communities. This is one of the largest minority concentrations in the State of Illinois. This area has been significantly affected by the exodus of many middle-class and affluent minority households migrating to formerly all-white or majority-white suburban communities. Consequently, the bottom communities suffer from disinvestment, few economic opportunities, a disproportionate number of poor residents and a housing stock that has increasingly become housing of last resort. As has been the case in similar situations across the nation, the disinvestment has also resulted in a lack of resources in affected school districts and a decline in positive perceptions of the affected communities.

Demographic Quick Facts	St. Clair County	St. Louis MSA (IL-MO)
Population Estimate, July 2009	263,617	2,828,990
Households, 2006	101,064	1,048,552
Median Age, 2006	35.6	37.2
Labor Force, June 2010	126,701	354,509 (IL part-St. Louis MSA)
Unemployment Rate, June 2010	11.0%	10.2% (IL part-St. Louis MSA)
Median Household Income, 2006	\$46,643	
Homeownership Rate, 2006	71%	

Largest Employers	Industry	Employment
Scott Air Force Base	Military	14,150
Memorial Hospital	Health Care	2,400
St. Elizabeth Hospital	Health Care	1,750
Southwestern Illinois College	Education	1,700
Midcoast Aviation	Aircraft Repair/Modification	1,600
Southern IL Healthcare Foundation	Health Care	1,400
Regions Bank	Financial Services	1,200
East St. Louis Schools	Education	1,000
St. Clair County	County Government	1,000
Casino Queen	Leisure/Hospitality	745
Belleville Schools	Education	700
O'Fallon Schools	Education	664
Allsup, Inc.	Disability Claims Services	600
Cahokia Schools	Education	461
Alton & Southern Railway	Railroad	350
City of Belleville	City Government	350
Metro East Industries	Railcar & Locomotive Repair	330
Afton Chemical	Manufacturing	275
Belleville News Democrat	Newspaper	250
The ROHO Group	Manufacturing	242
McKendree University	Education	223
Science Applications Intl. Corp.	IT Systems/Solutions	212
Shrine of Our Lady of the Snows	Religious & Tourism	200
Belleville Shoe Company	Manufacturing	200
Dental Network of America	Call Center	200
Helitech	Construction Services	200

- 2010 Action Plan activities funded through the CDBG program will be concentrated in low/moderate income areas, although some will benefit limited low-moderate income clientele and some limited activities may be provided to other areas that are exhibiting signs of slums or blight. We expect that the majority of activities to be carried out with the County's CDBG and HOME funding fall within two general categories—Public Facilities and Improvements, and Housing. St. Clair County will allocate a significant portion of its CDBG funds to assist public facilities and improvements in those northern and western portions of the County with greater needs, particularly in American Bottoms communities. Our housing activities (rehabilitation of existing housing, affordable housing development and homeownership assistance), will be targeted to households at income levels that are more predominant in these same communities. HOME funds must be utilized for housing activities benefiting low- and moderate-income households and will be targeted accordingly.

The map below shows the low-moderate income areas of the County based on 2000 census figures and the anticipated locations of non-residential CDBG funded activities. Other locations and activities may be added if funding is increased, and some locations may be deleted if funding is decreased.



3. St. Clair County will offer homebuyer counseling and downpayment and closing cost assistance to low- and moderate income homebuyers to overcome obstacles to becoming new homeowners. Comprehensive housing counseling services will be provided to the near homeless, homeless and chronically homeless to prevent homelessness and to build self-sufficiency for those who are already homeless. Wherever possible, the County will attempt to attract additional sources of funding to support these efforts.

Home repair, emergency home repair assistance and home accessibility improvements will be offered to low- and moderate-income homeowners to help sustain them in their homes.

IGD will seek to leverage funds wherever possible to make affordable housing development more financially feasible in the older, poorer, minority communities that border the City of East St. Louis. We will also provide infrastructure improvements that help overcome some of the obstacles to making these areas more viable.

The County will also demolish vacant, derelict buildings that are an obstacle to making suitable living environments available for low-moderate income households.

We will continue to communicate with local financial institutions to raise their awareness of the state and local programs that are available to businesses that locate in a tax increment financing district, a state enterprise zone or a rural area, which may make it possible to offer loans to businesses in low income areas.

4. Along with CDBG and HOME funds, St. Clair County expects to make Community Services Block Grant, Low Income Home Energy Assistance Program, Workforce Investment Act, McKinney- Vento Homeless Assistance Act, Illinois Housing Development Authority Trust Funds, Low-Income Housing Tax Credits (if successful applications are made), Section 8 Housing Choice Voucher, available to address the needs identified in its strategic plan during the 2010 program year.

Managing the Process

1. Identify the lead agency, entity, and agencies responsible for administering programs covered by the consolidated plan.
2. Identify the significant aspects of the process by which the plan was developed, and the agencies, groups, organizations, and others who participated in the process.
3. Describe actions that will take place during the next year to enhance coordination between public and private housing, health, and social service agencies.

Program Year 1 Action Plan Managing the Process response:

1. The lead agency overseeing the development of the 2010 Action Plan and for administering the programs covered by the plan is the St. Clair County Intergovernmental Grants Department (IGD).
2. The 2010 Action Plan was developed with active citizen participation, including consultations, informational meetings, needs assessment surveys and public hearings to solicit input and participation from public and private agencies (county-wide elected officials, social service providers and citizens).

The County held initial meetings to receive input from citizens on community development needs and the development of the 2010-2014 Consolidated Plan and the 2010 Action Plan on three different dates and at three different sites. The intent was to assure input to those with a variety of work, family, or other schedules. The first meeting was held on March 9, 2010 at the Centreville City Hall. The second meeting was held on March 10, 2010 at the New Athens Community Center and the third meeting was held on March 15, 2010 at the City of Lebanon City Hall.

Another meeting was held for citizen review and comment on the initial draft plan on Thursday, May 6 at the St. Clair County Court House in the St. Clair County Board Meeting Room. Summaries of these meetings are provided in the appendix.

All sites were ADA accessible, and provisions were made for people with disabilities. Signing was made available for those with hearing impairments and translators were available upon request for non-English speaking attendees.

Public notices informing citizens about the public meetings regarding the Consolidated Plan were published in the most widely circulated newspaper and were posted at town halls, libraries and on the County's official web site.

A substantial portion of the CDBG budget is used for public facilities and improvements. To plan for public facility priorities and budgeting, IGD sent applications to all communities/townships in the Entitlement Area. IGD staff also held a technical assistance meeting with representatives of these communities, townships, and their engineering firms. When the applications were received, IGD staff reviewed them for CDBG eligibility and scored them based on a rating sheet that uses factors including community need, past performance, and the percentage of low-moderate income population that will benefit from the improvements.

Projects recommended for funding were submitted to the St. Clair County Board Grants Committee in May. The County Board approved a Resolution and budget authorizing IGD and the County Board Chairman to submit the public facilities and improvements projects in the 2010 Annual Action Plan.

3. St. Clair County places a high priority on the coordination and leveraging of resources and services with other public and private resources. IGD has a Cooperation Agreement and a HOME Consortium Agreement with the City of Belleville for the 2010 program year, so the CD Division will continue to administer Belleville's CDBG and HOME funds. In addition, IGD administers the Community Services Block Grant (CSBG); Low Income Home Energy Assistance Program (LIHEAP); Weatherization Assistance Program; HUD Continuum of Care grants in conjunction with the St. Clair County Homeless Action Council; and Workforce Investment Act (WIA) programs. These grants provide funds for energy bill assistance, medical care, rental assistance, mortgage assistance, employment counseling and training, as well as housing repairs, housing rehabilitation, fair housing counseling, homebuyer assistance and counseling, housing accessibility grants and other programs that meet the needs of extremely low, very low, low and moderate-income people in the community.

In the coming year, IGD will continue to provide staff for the Homeless Action Council (HAC) Planning Committee to assist the Continuum of Care (CoC) in the implementation of the ten-year plan to end homelessness. The Housing Counseling Assistance Center (HCAC) also operates under the IGD umbrella. It will continue to operate Continuum of Care Programs for the homeless and near homeless, as well as administer Fair Housing and other housing counseling and education efforts.

IGD will also continue to provide a meeting place and clerical services for the Community Action Agency (CAA). The IGD Executive Director serves as Executive Director of the 18-member board of directors. Through IGD's CS Division the CAA provides a range of services that assist low-income individuals to attain skills, knowledge and motivation necessary to achieve self-sufficiency. Services available through the CAA include emergency crisis intervention, scholarships, clothing assistance, family development, transportation, food vouchers, medical/dental vouchers, temporary emergency shelter, prescription vouchers, utility assistance, homeless/near homeless assistance, recreational activities, advocacy, case management, information and referrals.

The CAA has developed partnerships with other social service providers and faith-based organizations to ensure that the needs of the low-income population are being addressed. Those partnerships include:

- Illinois Department of Human Services
- Catholic Urban Program
- Lessie Bates-Davis Neighborhood House
- East St. Louis Housing Authority
- St. Clair County Housing Authority
- Call for Help
- Homeless Action Council
- Programs and Services for Older Persons (Southwestern Illinois College)
- Living Independently Now Center (LINC), Inc.
- American Red Cross
- Beacon of Belleville
- St. Clair County Court Appointed Special Advocate (CASA)
- Okaw Valley Council Boys Scouts of America
- Urban League of Metropolitan St. Louis'
- Illinois Division of Employment Security One-Stop Centers

IGD's Employment and Training (ET) Division will coordinate the Workforce Investment Act (WIA) Program in St. Clair, Clinton, Monroe, Randolph and Washington Counties. Local Workforce Area (LWA) #24 will provide employment and training services through the Mid-America Workforce Investment Board, comprised of businesses, economic development, education, labor and community-based organizations, and partners in local One-Stop Centers. The partners include:

- St. Clair County Intergovernmental Grants Department,
- St. Clair County Housing Authority,
- St. Clair County Adult Education,
- Local Community Colleges,
- Programs and Services for Older Persons (operated by Southwest Illinois College),
- Illinois Department of Human Services (TANF),
- Illinois Department of Human Services (ORS),
- Illinois Department of Employment Security, and
- Members of local businesses that represent local hiring opportunities; which make up a majority of the Workforce Investment Board.

Citizen Participation

1. Provide a summary of the citizen participation process.
2. Provide a summary of citizen comments or views on the plan.
3. Provide a summary of efforts made to broaden public participation in the development of the consolidated plan, including outreach to minorities and non-English speaking persons, as well as persons with disabilities.
4. Provide a written explanation of comments not accepted and the reasons why these comments were not accepted.

*Please note that Citizen Comments and Responses may be included as additional files within the CPMP Tool.

Program Year 1 Action Plan Citizen Participation response:

1. The 2010 Action Plan was developed with active citizen participation, including consultations, informational meetings and needs assessment surveys. Public hearings on the Consolidated Plan to solicit input and participation from public and private agencies (countywide Elected Officials, Social Service Providers and citizens) were held throughout the County at multiple sites to foster a variety of input and maximize citizen attendance. Three initial hearings for needs determination were held at various sites in the County. These locations included Centreville, New Athens and Lebanon. Minutes of these meetings are included in the Appendix.

The first draft of the 2010 Action Plan was published for public review on the St. Clair County website (www.co.st-clair.il.us) on April 30, 2010 and a hearing was held for public comment on the draft plan on May 6, 2010. A notice of the availability of the summary plan was published in the newspaper and copies of the summary plan were made available to the public at various locations (Belleville and Lebanon public libraries, Shiloh Senior Center, Washington Park Senior Center and the St. Clair County Intergovernmental Grants Department.) A copy of St. Clair County's Citizen Participation Plan is included in the Appendix.

Notices announcing the meetings were posted at high-traffic sites (town halls, libraries, community centers, etc.) and circulated in the County's most widely circulated newspaper. Minutes of these meetings are included in this Plan.

2. Citizen questions and comments and responses are included in the meeting summaries included in the Appendix.
3. St. Clair County encouraged its citizens to participate in the development of the 2010 Action Plan, particularly low-moderate income persons where the County has plans to use CDBG and HOME funds. The County also took steps to encourage the participation of minorities and non-English speaking persons, as well as persons with disabilities. All public meeting sites were ADA accessible and interpreters were provided for those with hearing disabilities or language barriers. In consultation with the St. Clair County Housing Authority, the County also encouraged the participation of residents of public and assisted housing developments in developing and implementing the 2010 Action Plan. With the assistance of SCCHA, flyers notifying public housing residents about the publication of the proposed plan and the opportunities to review and comment upon it were posted at public housing development sites.

The availability of the proposed 2010 Action Plan and a list of the locations where copies of the proposed 2010 Action Plan could be examined, was published on July 12, 2010 in the Belleville News Democrat (the newspaper having the largest circulation in St. Clair County) to afford citizens, public agencies, and other interested parties a reasonable opportunity to examine its contents and to submit comments. The proposed plan was made available on the St. Clair County website on July 16, 2010 and copies were made available at libraries, government offices, and other public places. In addition, the County provided free copies of the proposed plan to citizens and groups that requested it.

4. All citizen comments were accepted and taken into consideration in the development of the 2010 Action Plan.

Institutional Structure

1. Describe actions that will take place during the next year to develop institutional structure.

Program Year 1 Action Plan Institutional Structure response:

IGD will continue with the same institutional structure as described in the Five-Year Consolidated Plan.

The institutional structure through which IGD carries out the consolidated plan has many strengths; the chief of which is coordination. By providing so many services under one umbrella, IGD minimizes the administrative costs necessary to administer federal and state housing rehabilitation, public works, employment and training, weatherization, energy assistance and Community Services Block Grant Programs more efficiently.

Providing services to rural areas of the county has proven to be challenging. Due to the lack of public transportation operating in these areas, rural populations

find it difficult to access program sites but it is also economically infeasible to provide program sites in such remote locations.

IGD's institutional structure includes many formalized collaborations, the most active of which is the Homeless Action Council. IGD's Homeless Action Council partners are selected based on their capacity to provide services and outreach within St. Clair County, and IGD does not have control over the existing landscape of service providers. However, because outreach to rural populations has proven to be difficult, IGD will try to discover and recruit new non-profit organizations that serve rural populations to the Homeless Action Council.

Monitoring

1. Describe actions that will take place during the next year to monitor its housing and community development projects and ensure long-term compliance with program requirements and comprehensive planning requirements.

Program Year 1 Action Plan Monitoring response:

1. Programmatic Monitoring

During the program year IGD CD staff will conduct at least one formal monitoring review at each subrecipient/subgrantee site, complete documentation that details their compliance with HUD regulations, and evaluate their performance and ability to meet the goals and objectives outlined in their contract with IGD.

IGD staff will maintain a ledger book for each public facilities and improvements contract, showing original amount of funds available, any funds added, and any payments made, with the date of each transaction noted, along with back-up documentation. They will also take photographs of the project before, during and after construction. Staff will interview project workers to assure Davis Bacon wage and job assignments are correct. IGD staff will review requests for payment and weekly payroll records before IGD will make any payouts.

IGD will require written authorization to any project Change Order calling for an increase or decrease in the original project contract bid price before the proposed additional work starts.

Fiscal Monitoring

CD staff will perform fiscal monitoring of all subrecipients/subgrantees. All budget revisions will require the prior approval by IGD. CD and Fiscal Division staff will review all billings submitted for accuracy. The Fiscal Division will also verify the existence and condition of CDBG/HOME purchased equipment.

HOME Compliance Monitoring

HOME staff will monitor HOME projects for compliance with HOME affordability requirements. They will review annual compliance reports for rents charged, annual tenant income certification forms, sample leases, and sample tenant application forms to ensure that rents and incomes comply with HUD guidelines and that leases and applications do not contain prohibited language.

Accessibility Compliance Monitoring

IGD staff will review the plans for all housing development projects assisted with CDBG or HOME funds for compliance with all applicable accessibility standards and will conduct site visits throughout construction to verify that the construction is completed in accordance with approved plans.

Lead-based Paint

1. Describe the actions that will take place during the next year to evaluate and reduce the number of housing units containing lead-based paint hazards in order to increase the inventory of lead-safe housing available to extremely low-income, low-income, and moderate-income families, and how the plan for the reduction of lead-based hazards is related to the extent of lead poisoning and hazards.

Program Year 1 Action Plan Lead-based Paint response:

1. In the past, the St. Clair County Intergovernmental Grants Department has received lead abatement funding from HUD. The most recent (10/01/06 to 10/30/09) used \$1,978,318.85 to produce 184 lead safe units, resulting in a total of 170 children with elevated blood levels (156 <10 µ/dl; 12 10-19 µ/dl; and 2 >20 µ/dl) being provided with lead safe housing.

Due to a lack of lead abatement funding from HUD for the year 2010, St. Clair County's ability to evaluate and reduce the number of housing units containing lead-based paint hazards over the next year is limited. However, the jurisdiction will take the following measures:

a) EVALUATION - The St. Clair County Health Department, the Southern Illinois Healthcare Foundation, and the East Side Health District will continue to conduct lead assessments, blood lead testing, and education. St. Clair County and the East Side Health District are currently partners in a grant with the Illinois Environmental Protection Agency for a U.S. Environmental Protection Agency (EPA) grant to distribute lead education materials and provide lead training to contractors.

b) EDUCATION - The County will continue to provide lead education, Chipper coloring books and brochures to the health departments to distribute to clients. The County will also distribute lead hazard information through other partners, such as the Catholic Urban Programs, the Society of St. Vincent DePaul, St. Clair County Housing Authority, CDBG Operations Corporation and other non-profit housing and health agencies. These agencies will use staff time to provide outreach and space to house the literature.

c) GENERAL HOUSING REHABILITATION - The County's Housing Rehabilitation Program intends to open its application process once a year. Homeowners will be able to apply for funding (except from the City of East St. Louis, which is a separate CDBG Entitlement community). The County Housing Rehabilitation Program application list is filled through a lottery system and there are no guarantees that households with EBL children will be chosen. However, once the County learns of EBL children or households with lead hazards, they become a priority. The County will also continue to provide a low-interest loan program that is open year round. When a client is accepted into either the grant or low-interest loan program the County addresses lead hazards first. At this time the County's Housing Rehabilitation Program is the primary avenue for lead remediation.

d) PLANNING FOR THE FUTURE - There is still a significant need to reduce lead-based hazards in St. Clair County. Over time, incidents of elevated blood lead levels have decreased in St. Clair County, and in 2007, St. Clair County's lead

screening results were similar to the State of Illinois' overall results. However, St. Clair County still has a higher rate of elevated blood lead levels than the United States as a whole. Furthermore, approximately 70% of St. Clair County housing units are at risk for lead-based paint hazards. Among housing units home to households with children age six and under, 11% of St. Clair County housing units are at risk for lead-based paint hazards. Therefore, IGD hopes to receive, and will continue to pursue, further lead abatement funding from HUD for years 2011 through 2014.

HOUSING

HOUSING

Specific Housing Objectives

*Please also refer to the Housing Needs Table in the Needs.xls workbook.

1. Describe the priorities and specific objectives the jurisdiction hopes to achieve during the next year.
2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.

Program Year 1 Action Plan Specific Objectives response:

1. To meet the affordable housing needs of its very low, low and moderate income residents, St. Clair County has devised the following three priority housing strategies.
 1. Owner-Occupied Single-Family Home Rehabilitation
 2. Single-Family Home New Construction
 3. Homebuyer Assistance Program

The specific objective that will be addressed by the 2010 Action Plan will be to:

Provide Decent Affordable Housing

Outcome: Availability/Accessibility of Decent Housing

- 4 homes made accessible for elderly and disabled homeowners
- 50 homeless or at risk of becoming homeless households provided with housing counseling and education services

Outcome: Affordability of Decent Housing

- Construction of 1 new home which are affordable to low-moderate income households.
- Purchase of affordable homes by 20 low- and moderate-income households provided with downpayment and losing cost assistance.

Outcome: Sustainability of Decent Housing

- 17 homes owned by low- and moderate-income households improved and repaired to make them safer, compliant with local building codes and lead safe.
- Emergency home repairs made to 4 homes owned by low- and moderate- income households.

2. Resources that are expected to be available to be used to address the identified needs for the 2010 Action Plan are:
 - CDBG - The County plans to continue using a portion of its CDBG funding to supplement the present owner-occupied Housing Rehabilitation Loan/Grant Program and the Emergency Repair Program. All program funds will benefit low-income residents of the County.
 - HOME - The County plans to continue using a portion of its HOME dollars to fund the present owner-occupied Housing Rehabilitation Program. The County will continue funding a Homebuyer Assistance Program and the construction of New Single Family Homes. All program funds will benefit the low-income residents of St. Clair County.
 - In addition, efforts with local organizations to offer mortgage and home improvement assistance will be continued. Lending institutions will be encouraged to continue efforts towards providing financing to potential homebuyers throughout St. Clair County and neighborhood organizations concerned with providing standard housing will be encouraged.

Needs of Public Housing

1. Describe the manner in which the plan of the jurisdiction will help address the needs of public housing and activities it will undertake during the next year to encourage public housing residents to become more involved in management and participate in homeownership.
2. If the public housing agency is designated as "troubled" by HUD or otherwise is performing poorly, the jurisdiction shall describe the manner in which it will provide financial or other assistance in improving its operations to remove such designation during the next year.

Program Year 1 Action Plan Public Housing Strategy response:

1. SCCHA will maximize the number of affordable units available within current resources by:
 - Employing effective maintenance and management policies to minimize the number of public housing units off-line;
 - Reducing turnover time for vacated public housing units;
 - Maintaining or increasing Section 8 Lease-up rates by establishing payments standards that will enable families to rent throughout the jurisdiction;
 - Undertaking measures to ensure access to affordable housing among families assisted by the PHA, regardless of unit size required;
 - Maintaining or increasing Section 8 lease-up rates by marketing the program to owners, particularly those outside of areas of minority and poverty concentration;
 - Maintaining or increasing Section 8 lease-up rates by effectively screening Section 8 applicants to increase owner acceptance of program;

SCCHA will increase the number of affordable housing units by:

- Applying for additional Section 8 units designated for household with disabilities should the opportunity become available;
- Supporting the efforts of others to increase the number of affordable housing units (i.e. using low-income housing tax credit and other federal, state and/or local programs).

SCCHA will target available assistance to families at or below 30% of area median income (AMI) by:

- Exceeding HUD federal targeting requirements for families at or below 30% of AMI in public housing;
- Exceeding HUD federal targeting requirements for families at or below 30% of AMI in tenant-based Section 8 assistance;
- Employing admission preferences aimed at families with economic hardships;
- Adopting rent policies to support and encourage work.

SCCHA will target available assistance to families at or below 50 of AMI by:

- Employing admissions preferences aimed at families who are working;
- Adopting rent policies to support and encourage work.

SCCHA will target available assistance to the elderly by:

- Designating certain public housing units for occupancy by senior citizens only (those age 62 or older).

SCCHA will target available assistance to families with disabilities by:

- Designating certain public housing units for occupancy by non-senior persons with disabilities;
- Carrying out modifications needed in public housing based on the Section 504 Needs Assessment for Public Housing;
- Affirmatively marketing to local non-profit agencies that assist families with disabilities.

SCCHA's strategy for addressing the revitalization and restoration needs of its public housing properties, improving the management and operation of the public housing program, and improving the living environment of families residing in public housing include the following:

Effectively using the Capital Fund Grant program for physical improvements by:

- Applying for other capital improvement funds when available (such as County weatherization program);
- Implementing effective routine and preventive maintenance programs;
- Providing training and professional development for front-line and supervisory employees;

- Achieving “high performer” designation under HUD’s public housing assessment system;
- Employing effective applicant screening techniques/practices to screen-out undesirable households;
- Employing effective lease enforcement techniques/practices to evict undesirable households residing in public housing.
- Engaging, supporting and cooperating with local law enforcement to ensure the level of service provided the public housing neighborhoods is at or above that provided the community at large.
- Making collaborative efforts with law enforcement, resident organizations, and others to ensure that the level of criminal activity in the public housing developments is at or below the surrounding neighborhoods.

St. Clair County will help address the needs of public housing and its residents by:

- Making grant monies available to assist residents with rent, security deposits, utility bills and other services when available.
- Making grant monies available for infrastructure improvements (roads, sewers, etc.) and physical improvements to public housing units (i.e. weatherization) subject to fund availability and competing needs.

SCCHA will continue to support Public Housing Resident Councils and the Resident Advisory Board, which plays an important role in the development and annual update of its Agency Plan.

2. N/A

Barriers to Affordable Housing

1. Describe the actions that will take place during the next year to remove barriers to affordable housing.

Program Year 1 Action Plan Barriers to Affordable Housing response:

1. IGD will provide down payment and closing cost assistance to low-income buyers. It will also continue to work with a consortium of banks known as the Metro-East Lending Group, which has increased the availability of home financing, particularly in the American Bottoms area, through education and product expansion. It will also continue to work with the Housing Acquisition Program in targeted central areas of Belleville, under which lenders combine resources for low-income buyers. The program features a 5% down payment requirement and no PMI (private mortgage insurance).

The Economic Development Department will work to create more and better employment opportunities for St. Clair County residents by making low-interest loans to businesses that hire low-moderate income residents. With the creation and expansion of businesses and more employment, total assessed valuation in distressed areas should increase, thereby making affordable housing development more financially feasible.

IGD is also committed to ensuring that the affordable housing (and market-rate housing) that is available throughout St. Clair County is available to persons and families regardless of their race, color, national origin, religion, sex, familial status or handicap. To that end, IGD updated St. Clair County's Analysis of Impediments to Fair Housing in July of 2010. The updated Analysis of Impediments is available from IGD upon request.

HOME/ American Dream Down payment Initiative (ADDI)

1. Describe other forms of investment not described in § 92.205(b).
2. If the participating jurisdiction (PJ) will use HOME or ADDI funds for homebuyers, it must state the guidelines for resale or recapture, as required in § 92.254 of the HOME rule.
3. If the PJ will use HOME funds to refinance existing debt secured by multifamily housing that is that is being rehabilitated with HOME funds, it must state its refinancing guidelines required under § 92.206(b). The guidelines shall describe the conditions under which the PJ will refinance existing debt. At a minimum these guidelines must:
 - a. Demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing.
 - b. Require a review of management practices to demonstrate that disinvestments in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving the targeted population over an extended affordability period can be demonstrated.
 - c. State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.
 - d. Specify the required period of affordability, whether it is the minimum 15 years or longer.
 - e. Specify whether the investment of HOME funds may be jurisdiction-wide or limited to a specific geographic area, such as a neighborhood identified in a neighborhood revitalization strategy under 24 CFR 91.215(e)(2) or a Federally designated Empowerment Zone or Enterprise Community.
 - f. State that HOME funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.
4. If the PJ is going to receive American Dream Down payment Initiative (ADDI) funds, please complete the following narratives:
 - a. Describe the planned use of the ADDI funds.
 - b. Describe the PJ's plan for conducting targeted outreach to residents and tenants of public housing and manufactured housing and to other families assisted by public housing agencies, for the purposes of ensuring that the ADDI funds are used to provide down payment assistance for such residents, tenants, and families.

- c. Describe the actions to be taken to ensure the suitability of families receiving ADDI funds to undertake and maintain homeownership, such as provision of housing counseling to homebuyers.

Program Year 1 Action Plan HOME/ADDI response:

- 1. N/A
- 2. All agreements with homebuyers will include the following provision:

In the event Home Buyer sells or transfers ownership of the Unit during the Affordability Period, or the Unit does not continue to be the principal residence of the Home Buyer for the duration of the Affordability Period, the HOME Investment shall become immediately due and payable. Notwithstanding the foregoing, and any provision of the Home Buyer Second Note or the Home Buyer Second Mortgage to the contrary, if the Net Proceeds (hereinafter defined) from the sale of the Unit are not sufficient to repay the HOME Investment, plus enable the Home Buyer to recover the amount of the Home Buyer's Investment (hereinafter defined), the Net Proceeds shall be proportionally shared by Home Buyer and County in accordance with the following formulas:

$$\frac{\text{HOME Investment}}{\text{HOME Investment} + \text{Homebuyer Investment}} \times \text{Net Proceeds} = \text{Amount paid to County}$$

$$\frac{\text{Home Buyer Investment}}{\text{HOME Investment} + \text{Homebuyer Investment}} \times \text{Net Proceeds} = \text{Amount paid to Home Buyer}$$

"Affordability Period" means a period of 5 years provided that the Home Loan is less than \$15,000; 10 years if the Home Loan is between \$15,000 and \$40,000; and 15 years if the Home Loan is \$40,000 or more (see 24 CFR 92.254).

"Net Proceeds" means the sales price of the Unit minus repayment of the Homebuyer Private Loan and reasonable and customary closing costs.

"Home buyer's Investment" means the sum of the Home buyer's down-payment upon acquisition of the Unit plus any third party capital improvement costs paid by the Home buyer since the date of purchase of the Unit.

Provided that there is then no default under the documents evidencing or securing the Home Loan, upon expiration of the Affordability Period, the County will cancel the Homebuyer Second Note and release the Homebuyer Second Mortgage.

- 3. N/A
- 4. N/A

HOMELESS

HOMELESS

Specific Homeless Prevention Elements

*Please also refer to the Homeless Needs Table in the Needs.xls workbook.

1. Sources of Funds—Identify the private and public resources that the jurisdiction expects to receive during the next year to address homeless needs and to prevent homelessness. These include the McKinney-Vento Homeless Assistance Act programs, other special federal, state and local and private funds targeted to homeless individuals and families with children, especially the chronically homeless, the HUD formula programs, and any publicly-owned land or property. Please describe, briefly, the jurisdiction's plan for the investment and use of funds directed toward homelessness.
2. Homelessness—In a narrative, describe how the action plan will address the specific objectives of the Strategic Plan and, ultimately, the priority needs identified. Please also identify potential obstacles to completing these action steps.
3. Chronic homelessness—The jurisdiction must describe the specific planned action steps it will take over the next year aimed at eliminating chronic homelessness by 2012. Again, please identify barriers to achieving this.
4. Homelessness Prevention—The jurisdiction must describe its planned action steps over the next year to address the individual and families with children at imminent risk of becoming homeless.
5. Discharge Coordination Policy—Explain planned activities to implement a cohesive, community-wide Discharge Coordination Policy, and how, in the coming year, the community will move toward such a policy.

Program Year 1 Action Plan Special Needs response:

1. IGD expects to use CDBG, HOME, CSBG, and LIHEAP funding in order to prevent and remedy homelessness in St. Clair County, as well as encourage individual non-profits to raise funds for additional services. IGD's intends to coordinate the investment and use of funds directed toward homelessness and homelessness prevention with the 2010 Continuum of Care strategic plan (not yet published). IGD is a key member of the St. Clair County Continuum of Care.
2. IGD's homelessness action steps for the year 2010 will be coordinated with the St. Clair County Continuum of Care strategic plan and will likely be similar to the homelessness action steps from previous years. It is expected that St. Clair County Continuum of Care organizations, working in concert, will:
 - a. Work to ensure that the percentage of homeless persons remaining in permanent housing for at least six months remains at 83%.
 - b. Increase coordination between transitional housing and permanent housing providers to increase the percentage of homeless persons moving from transitional housing to permanent housing to at least 65%. Each agency will increase efforts to have all transitional housing clients to apply

for all available permanent housing. The CEOs of Call for Help, Bethany Place, and CDBG Operations are responsible.

- c. Keep the percentage of homeless persons employed after Continuum of Care program exit at least 43%. The HCAC requires all SSO participants to complete an on-line Illinois Job Skills Match and apply for enrollment in the Workforce Investment Act programs.
 - d. Decrease the total number of homeless households with children to 57 households. IGD and several other members of the Continuum of Care are administering HPRP funds, which is the primary approach to combating homelessness among families with children. With HPRP, IGD has a 24-month window in which to provide intensive support and rental subsidies to families who are homeless or who face eminent homelessness without HPRP assistance.
3. IGD's chronic homelessness action steps for the year 2010 will be coordinated with the St. Clair County Continuum of Care strategic plan and will likely be similar to the chronic homelessness action steps from previous years.

The primary barrier to eliminating chronic homelessness is the general lack of funding resources available to the public and private agencies who serve the needs of the homeless. The level of federal funding has declined while neither state nor local funds have been able to fill the gap. In addition, sometimes community resistance can hamper the creation, location or expansion of agencies serving the chronically homeless.

4. IGD's homelessness prevention action steps for the year 2010 will be coordinated with the St. Clair County Continuum of Care strategic plan and will likely be similar to the homelessness prevention action steps from previous years. It is expected that St. Clair County Continuum of Care organizations, working in concert, will:
 - a. Works to coordinate prevention outreach, so as to minimize duplication of effort and maximize the effective distribution of homeless prevention funds to needy individuals and families. In response to the challenges of tracking the homeless population and service delivery, IGD established the Homeless Action Council and developed the Homeless Management Information System (HMIS) for tracking population and services. All agencies receiving homes prevention funds have access to the Homeless Management Information System (HMIS), to help identify persons in need and report on outcomes.
 - b. Administer Homeless Prevention and Rapid Re-Housing Program (HPRP) funds in order to provide intensive support and rental subsidies to families who face imminent homelessness. This is the primary approach to combating homelessness among families with children.
 - c. Leverage HPRP funds with other prevention services and funding. For example, the Low-Income Home Energy Assistance Program (LIHEAP) assists low income households in paying home energy bills, in order to make housing temporarily more affordable. Community Services Block Grant (CSBG) funding provides rental, deposit, and mortgage assistance. A variety of private nonprofits provide prescription assistance, meal assistance, and utility assistance.

- d. Monitors client outcomes on a monthly basis in order to track the results of efforts.
5. Each institution or system of care in St. Clair County follows the relevant state-mandated discharge policy for the type of institution. This guarantees that any specialized discharge concerns for each particular institution are understood and that appropriate actions are taken. The discharge policies are similar to one another and are described in St. Clair County's Continuum of Care Strategic Plan.

IGD, as a member of the Continuum of Care, has access to and is able to review each of these discharge policies. IGD will collect these discharge policies in a centralized location and will continue to work with service providers to coordinate efforts via the HMIS system and the HCAC and HAC.

Emergency Shelter Grants (ESG)

(States only) Describe the process for awarding grants to State recipients, and a description of how the allocation will be made available to units of local government.

Program Year 1 Action Plan ESG response: N/A

COMMUNITY DEVELOPMENT

COMMUNITY DEVELOPMENT

Community Development

*Please also refer to the Community Development Table in the Needs.xls workbook.

1. Identify the jurisdiction's priority non-housing community development needs eligible for assistance by CDBG eligibility category specified in the Community Development Needs Table (formerly Table 2B), public facilities, public improvements, public services and economic development.
2. Identify specific long-term and short-term community development objectives (including economic development activities that create jobs), developed in accordance with the statutory goals described in section 24 CFR 91.1 and the primary objective of the CDBG program to provide decent housing and a suitable living environment and expand economic opportunities, principally for low- and moderate-income persons.

*Note: Each specific objective developed to address a priority need, must be identified by number and contain proposed accomplishments, the time period (i.e., one, two, three, or more years), and annual program year numeric goals the jurisdiction hopes to achieve in quantitative terms, or in other measurable terms as identified and defined by the jurisdiction.

Program Year 1 Action Plan Community Development response:

1. St. Clair County will provide CDBG funds to 20 municipalities and townships to make public facility improvements in low and low-moderate income areas. Grants will be provided to improve senior centers, make flood drain improvements, water and sewer improvements, and street improvements.

More specifically, our highest priority non-housing community development needs for the 2010 Action Plan are shown on the table below. The needs identified in the table are all considered high priorities.

ACTIVITY	CDBG ELIBILITY	MATRIX CODE	ACCOMPLISHMENT TYPE	2010 GOAL
Flood Drain Improvements	§570.201(c)	03I	Public Facilities	2
Water/Sewer Improvements	§570.201(c)	03J	Public Facilities	10
Street Improvements	§570.201(c)	03K	Public Facilities	6

2. Specific Long Term and Short Term Community Development Objectives:
 - a. Increase coordination between the communities, and other Federal and State programs for local infrastructure development.
 - b. Support local efforts towards better long range planning to resolve public facility problems, especially in areas plagued by constant flooding and sanitary sewer problems.
 - c. Over the next five years, using CDBG assistance, complete 100 Public Facilities and Improvement Projects.

See Housing and Community Development Activities Table on Following Pages:

Only complete blue sections.

Jurisdiction	Needs	Current	Gap	5-Year Quantities										Priority Need H, M, L	Dollars to Address	Plan to Fund? Y/N	Fund Source					
				Year 1		Year 2		Year 3		Year 4		Year 5						Cumulative Goal	Actual	% of Goal		
				Goal	Actual	Goal	Actual	Goal	Actual	Goal	Actual	Goal	Actual									
Housing and Community Development Activities																						
16A Residential Historic Preservation 570.202(d)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	L	N	N	
16B Non-Residential Historic Preservation 570.202(d)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	N	N
17A CI Land Acquisition/Disposition 570.203(a)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	N	N
17B CI Infrastructure Development 570.203(a)	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	0	0	L	N
17C CI Building Acquisition, Construction, Rehabilitat 570.203(a)	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	0	0	L	N
17D Other Commercial/Industrial Improvements 570.203(a)	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	0	0	L	N
18A ED Direct Financial Assistance to For-Profits 570.203(b)	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	0	0	M	N
18B ED Technical Assistance 570.203(b)	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	0	0	L	N
18C Micro-Enterprise Assistance	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	L	N
19A HOME Admin/Planning Costs of PJ (not part of 5% Ad	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	0	0	L	N
19B HOME CHDO Operating Costs (not part of 5% Admin ca	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	0	0	L	N
19C CDBG Non-profit Organization Capacity Building	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	L	N
19D CDBG Assistance to Institutes of Higher Education	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	L	N
19E CDBG Operation and Repair of Foreclosed Property	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	L	N
19F Planned Repayment of Section 108 Loan Principal	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	L	N
19G Unplanned Repayment of Section 108 Loan Principal	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	L	N
19H State CDBG Technical Assistance to Grantees	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	0	0	L	N
20 Planning 570.205	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	1	0	0	0	L	N
21A General Program Administration 570.206	5	0	5	1	5	1	5	1	5	1	5	1	5	1	5	1	5	1	0	0	H	Y
21B Indirect Costs 570.206	5	0	5	1	5	1	5	1	5	1	5	1	5	1	5	1	5	1	0	0	H	Y
21D Fair Housing Activities (subject to 20% Admin cap) 570.206	1	0	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	0	0	H	Y
21E Submissions or Applications for Federal Programs 570.206	5	0	5	1	5	1	5	1	5	1	5	1	5	1	5	1	5	1	0	0	H	Y
21F HOME Rental Subsidy Payments (subject to 5% cap)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	L	N
21G HOME Security Deposits (subject to 5% cap)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	L	N
21H HOME Admin/Planning Costs of PJ (subject to 5% cap)	5	0	5	1	5	1	5	1	5	1	5	1	5	1	5	1	5	1	0	0	H	Y
21I HOME CHDO Operating Expenses (subject to 5% cap)	1	0	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	0	0	H	Y
22 Unprogrammed Funds	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	L	N
31J Facility based housing - development	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	L	N
31K Facility based housing - operations	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	L	N
31G Short term rent mortgage utility payments	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	L	N
31F Tenant based rental assistance	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	L	N
31E Supportive service	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	L	N
31I Housing information services	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	L	N
31H Resource identification	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	L	N
31B Administration - grantee	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	L	N
31D Administration - project sponsor	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	L	N

Antipoverty Strategy

1. Describe the actions that will take place during the next year to reduce the number of poverty level families.

Program Year 1 Action Plan Antipoverty Strategy response:

1. While many factors related to poverty are beyond the control of County government, the County is committed to addressing poverty issues and improving the welfare and economic status of its residents wherever possible. Some of the services described in this plan are devoted primarily to helping those in poverty. Some, like Homeless Services, are basic elements of the “safety net” geared to those in most need. Others, like promotion of home ownership, job creation and education, are more fundamental to the long term reduction of poverty.

In the 2010 program year the County will undertake a number of initiatives that are consistent with the long-term approach to reducing poverty levels. The County will continue to allocate funding to public service activities through the CDBG program for the Housing Counseling Assistance Center. Other CDBG and HOME funded activities will assist lower income persons through such activities as home repair, homeownership assistance, public facilities infrastructure, and a senior/disabled person home accessibility improvement program. All of these activities benefit lower income persons and serve to improve their economic status and well being. In addition, CDBG funds will be allocated for business development supported activities resulting in the creation or retention of jobs, a majority of which will be held by low and moderate income persons.

NON-HOMELESS SPECIAL NEEDS

NON-HOMELESS SPECIAL NEEDS HOUSING

Non-homeless Special Needs (91.220 (c) and (e))

*Please also refer to the Non-homeless Special Needs Table in the Needs.xls workbook.

1. Describe the priorities and specific objectives the jurisdiction hopes to achieve for the period covered by the Action Plan.
2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.

Program Year 1 Action Plan Specific Objectives response:

1. Special needs persons generally face two key challenges: the challenge of finding quality affordable housing and the challenge of finding appropriate supportive services. St. Clair County's 2010 Action Plan priorities focus on each of those challenges separately, so the objectives for affordable housing for special needs persons overlap with the objectives for affordable housing for very low, low, and moderate income residents, and the objectives for supportive services for special needs persons overlap with the objectives for supportive services for other at-risk populations.

Special needs persons often face the same sorts of housing challenges as very low, low- and moderate-income residents. The availability of quality affordable housing can give special needs persons the ability to focus their energy and resources on obtaining the supportive services they require. To meet the affordable housing needs of its Special Needs populations, St. Clair County has the following three priority housing strategies.

- Owner-Occupied Single-Family Home Rehabilitation CDBG—over the next year the County plans to continue using a portion of its CDBG funding to supplement the owner-occupied Home Repair, Emergency Home Repair and Home Accessibility Improvement programs. All program funds will benefit people with special needs.

All eligible persons (i.e. elderly, special needs, homeless, small families and large families) throughout St. Clair County may seek assistance for any of the above mentioned programs.

Although special needs persons are generally not homeless, they do require some of the same sorts of supportive services that IGD coordinates through the Housing Counseling Assistance Center, the Homeless Action Council, and the St. Clair County Continuum of Care. Specifically, the following supportive service strategies will be of benefit to non-homeless special needs persons:

- Continue to maintain and utilize the Homeless Management Information System (HMIS) for tracking population and services, minimizing duplication of effort, and maximizing the distribution of homeless prevention funds to needy individuals and families. Despite the name, the HMIS tracks supportive services received by non-homeless persons and

households who may be at risk for homelessness due to extenuating circumstances, such as disability, domestic violence, or substance abuse.

- Administer Low-Income Home Energy Assistance Program (LIHEAP) funding to assist low income households in paying home energy bills, in order to make housing temporarily more affordable.
 - Utilize Community Services Block Grant (CSBG) funding to provide rental, deposit, and mortgage assistance.
 - Partner with private nonprofits through the Housing Counseling Assistance Center and the Homeless Action Council to connect special needs population with services such as prescription assistance, meal assistance, and short term specialized care.
2. Over the next year the County plans to continue using a portion of its CDBG and HOME funding to supplement the Home Rehab Program and will use CDBG funds for the Home Accessibility Program and the Emergency Home Repair Program. All program funds will benefit people with special needs.

Housing Opportunities for People with AIDS

*Please also refer to the HOPWA Table in the Needs.xls workbook.

1. Provide a Brief description of the organization, the area of service, the name of the program contacts, and a broad overview of the range/ type of housing activities to be done during the next year.
2. Report on the actions taken during the year that addressed the special needs of persons who are not homeless but require supportive housing, and assistance for persons who are homeless.
3. Evaluate the progress in meeting its specific objective of providing affordable housing, including a comparison of actual outputs and outcomes to proposed goals and progress made on the other planned actions indicated in the strategic and action plans. The evaluation can address any related program adjustments or future plans.
4. Report on annual HOPWA output goals for the number of households assisted during the year in: (1) short-term rent, mortgage and utility payments to avoid homelessness; (2) rental assistance programs; and (3) in housing facilities, such as community residences and SRO dwellings, where funds are used to develop and/or operate these facilities. Include any assessment of client outcomes for achieving housing stability, reduced risks of homelessness and improved access to care.
5. Report on the use of committed leveraging from other public and private resources that helped to address needs identified in the plan.
6. Provide an analysis of the extent to which HOPWA funds were distributed among different categories of housing needs consistent with the geographic distribution plans identified in its approved Consolidated Plan.

7. Describe any barriers (including non-regulatory) encountered, actions in response to barriers, and recommendations for program improvement.
8. Please describe the expected trends facing the community in meeting the needs of persons living with HIV/AIDS and provide additional information regarding the administration of services to people with HIV/AIDS.
9. Please note any evaluations, studies or other assessments that will be conducted on the local HOPWA program during the next year.

Program Year 1 Action Plan HOPWA response: N/A

Specific HOPWA Objectives

Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the Action Plan.

Program Year 1 Specific HOPWA Objectives response: N/A

WORKSHEETS

Housing Market Analysis

Housing Needs Table

Continuum of Care Homeless Population and Subpopulations Chart

Housing and Community Development Activities

Non-Homeless Special Needs Including HOPWA

Housing Needs Table		Grantee:												Dispropor- tionate Racial/ Ethnic Need?	# of House- holds in lead- ing Hazard Housing	Total Low Income HIV/AIDS Population			
		Only complete blue sections. Do NOT type in sections other than blue.																	
Household Income > 30 to <= 50% MFI	Owner	All other hshold	Current % of Households	Current Number of Households	3-5 Year Quantities										Priority Need?	Plan. to Fund?	Fund. Source	Households with a Disabled Member	YES
					Year 1	Year 2	Year 3	Year 4*	Year 5*	Multi-Year	% Goal								
					Goal	Actual	Goal	Actual	Goal	Actual	Goal	Actual	Goal	Actual	Goal	% HSHLD	# HSHLD		
			100%	823												100%			
				434	0												0		
				434	0														
				85	0														
			100%	1640															
				944	0														
				898	0														
				95	0														
			100%	439															
				290	0														
				156	0														
				37	0														
			100%	1306															
				812	0														
				798	0														
				135	0														
			100%	3047															
				924	15														
				920	10														
				290	5														
			100%	1269															
				712	15														
				694	10														
				257	5														
			100%	451															
				289	10														
				229	6														
				48	4														
			100%	596															
				324	0														
				324	0														
				144	0														

Housing Needs Table		Grantee:												Disproportionate Racial/ Ethnic Need?	# of House- holds in Hazard Housing	Total Low Income HIV/AIDS Population		
		Only complete blue sections. Do NOT type in sections other than blue.																
Household Income > 50 to < =80% MFI	Owner	3-5 Year Quantities												Priority Need?	Plan to Fund?	Fund Source	Households with a Disabled Member	
		Year 1	Year 2	Year 3	Year 4*	Year 5*	Multi-Year	% of Goal										
		Goal	Actual	Goal	Actual	Goal	Actual	Goal	Actual	Goal	Actual	Goal	Actual	% HSHLD	% HSHLD			
Renter	Elderly	NUMBER OF HOUSEHOLDS	674											100%		YES		
		With Any Housing Problems	181															
		Cost Burden > 30%	181															
		Cost Burden > 50%	49															
		NUMBER OF HOUSEHOLDS	2616														YES	
		With Any Housing Problems	457															
	Cost Burden > 30%	340																
	Cost Burden > 50%	28																
	Small Related	NUMBER OF HOUSEHOLDS	579														YES	
		With Any Housing Problems	133															
		Cost Burden > 30%	10															
		Cost Burden > 50%	0															
NUMBER OF HOUSEHOLDS		2370														YES		
With Any Housing Problems		385																
Owner	All other hshold	With Any Housing Problems	340															
		Cost Burden > 30%	30															
		Cost Burden > 50%	0															
		NUMBER OF HOUSEHOLDS	4273														YES	
		With Any Housing Problems	575															
		Cost Burden > 30%	539															
	Elderly	Cost Burden > 50%	118															
		NUMBER OF HOUSEHOLDS	3834														YES	
		With Any Housing Problems	1214															
		Cost Burden > 30%	1184															
		Cost Burden > 50%	241															
		NUMBER OF HOUSEHOLDS	1035														YES	
Small Related	With Any Housing Problems	413																
	Cost Burden > 30%	274																
	Cost Burden > 50%	61																
	NUMBER OF HOUSEHOLDS	1542														YES		
	With Any Housing Problems	536																
	Cost Burden > 30%	522																
Large Related	Cost Burden > 50%	75																
	NUMBER OF HOUSEHOLDS	1542														YES		
	With Any Housing Problems	536																
	Cost Burden > 30%	522																
	Cost Burden > 50%	75																
	All other hshold																	

Continuum of Care Homeless Population and Subpopulations Chart

Part 1: Homeless Population	Sheltered		Un-sheltered	Total	Jurisdiction Data Quality											
	Emergency	Transitional														
1. Homeless Individuals	36	10	215	261	(A) administrative records ▼											
2. Homeless Families with Children	32	26	34	92												
2a. Persons in Homeless with Children Families	110	86	79	275												
Total (lines 1 + 2a)	146	96	294	536												
Part 2: Homeless Subpopulations	Sheltered		Un-sheltered	Total	Data Quality											
	Emergency	Transitional														
1. Chronically Homeless	69	30	30	99	(A) administrative records ▼											
2. Severely Mentally Ill	28	0	0	28												
3. Chronic Substance Abuse	3	0	0	3												
4. Veterans	17	0	0	17												
5. Persons with HIV/AIDS	4	0	0	4												
6. Victims of Domestic Violence	11	0	0	11												
7. Youth (Under 18 years of age)	1	0	0	1												
Part 3: Homeless Needs Table: Individuals	Needs	Currently Available	Gap	5-Year Quantities					Total	Priority H, M, L	Plan to Fund?	Fund Source:				
Emergency Shelters	242	67	175	Year 1 Goal	Year 1 Complete	Year 2 Goal	Year 2 Complete	Year 3 Goal	Year 3 Complete	Year 4 Goal	Year 4 Complete	Year 5 Goal	Year 5 Complete	% of Goal	Other	
Transitional Housing	128	26	102	5	0	0	0	0	0	0	0	0	0	0%	Other	
Permanent Supportive Housing	82	49	33	16	0	0	0	0	0	0	0	0	0	0%	Other	
Total	452	142	310	12	0	0	0	0	0	0	0	0	0	0%	Other	
Chronically Homeless	99	47													H	Other

Part 4: Homeless Needs Table: Families	Needs	Currently Available	Gap	5-Year Quantities										Priority H, M, L	Plan to Fund?	Fund Source: CDBG, HOME, HOPWA, ESG, or Other		
				Year 1		Year 2		Year 3		Year 4		Year 5					Total	
				Goal	Complete	Goal	Complete	Goal	Complete	Goal	Complete	Goal	Complete				Goal	Actual
Beds	Emergency Shelters	74	66	8	10	0	0	0	0	0	0	0	0	0	0	0%	H	Other
	Transitional Housing	93	26	67	4	0	0	0	0	0	0	0	0	0	0	0%	M	Other
	Permanent Supportive Housing	117	67	50	3	0	0	0	0	0	0	0	0	0	0	0%	H	Other
	Total	284	159	125	17	0	0	0	0	0	0	0	0	0	0	0%		

Completing Part 1: Homeless Population. This must be completed using statistically reliable, unduplicated counts or estimates of homeless persons in sheltered and unsheltered locations at a one-day point in time. The counts must be from: (A) administrative records, (N) enumerations, (S) statistically reliable samples, or (E) estimates. The quality of the data presented in each box must be identified as: (A), (N), (S) or (E).

Completing Part 2: Homeless Subpopulations. This must be completed using statistically reliable, unduplicated counts or estimates of homeless persons in sheltered and unsheltered locations at a one-day point in time. The numbers must be from: (A) administrative records, (N) enumerations, (S) statistically reliable samples, or (E) estimates. The quality of the data presented in each box must be identified as: (A), (N), (S) or (E).

Sheltered Homeless. Count adults, children and youth residing in shelters for the homeless. "Shelters" include all emergency shelters and transitional shelters for the homeless, including domestic violence shelters, residential programs for runaway/homeless youth, and any hotel/motel/apartment voucher arrangements paid by a public/private agency because the person or family is homeless. Do not count: (1) persons who are living doubled up in conventional housing; (2) formerly homeless persons who are residing in Section 8 SRO, Shelter Plus Care, SHP permanent housing or other permanent housing units; (3) children or youth, who because of their own or a parent's homelessness or abandonment, now reside temporarily and for a short anticipated duration in hospitals, residential treatment facilities, emergency foster care, detention facilities and the like; and (4) adults living in mental health facilities, chemical dependency facilities, or criminal justice facilities.

Unsheltered Homeless. Count adults, children and youth sleeping in places not meant for human habitation. Places not meant for human habitation include streets, parks, alleys, parking ramps, parts of the highway system, transportation depots and other parts of transportation systems (e.g. subway tunnels, railroad car), all-night commercial establishments (e.g. movie theaters, laundromats, restaurants), abandoned buildings, building roofs or stairwells, chicken coops and other farm outbuildings, caves, campgrounds, vehicles, and other similar places.

Jurisdiction																					
Only complete blue sections.																					
Housing and Community Development Activities	Needs	Current	Gap	5-Year Quantities												Priority Need: H, M, L	Dollars to Address	Plan to Fund? Y/N	Fund Source		
				Year 1		Year 2		Year 3		Year 4		Year 5		Cumulative							
				Goal	Actual	Goal	Actual	Goal	Actual	Goal	Actual	Goal	Actual	Goal	Actual					% of Goal	
05 Public Services (General) 570.201(e)	1500	962	538	50											50	0	0%	M		Y	CDBG
05A Senior Services 570.201(e)	1	0	1	0											0	0	###	L		N	
05B Handicapped Services 570.201(e)	0	0	0	0											0	0	###	L		N	
05C Legal Services 570.201(E)	0	0	0	0											0	0	###	L		N	
05D Youth Services 570.201(e)	0	0	0	0											0	0	###	L		N	
05E Transportation Services 570.201(e)	0	0	0	0											0	0	###	L		N	
05F Substance Abuse Services 570.201(e)	0	0	0	0											0	0	###	L		N	
05G Battered and Abused Spouses 570.201(e)	0	0	0	0											0	0	###	L		N	
05H Employment Training 570.201(e)	0	0	0	0											0	0	###	L		N	
05I Crime Awareness 570.201(e)	0	0	0	0											0	0	###	L		N	
05J Fair Housing Activities (if CDBG, then subject to 570.201(e))	0	0	0	0											0	0	###	L		N	
05K Tenant/Landlord Counseling 570.201(e)	1	0	1	0											0	0	###	L		N	
05L Child Care Services 570.201(e)	0	0	0	0											0	0	###	L		N	
05M Health Services 570.201(e)	0	0	0	0											0	0	###	L		N	
05N Abused and Neglected Children 570.201(e)	0	0	0	0											0	0	###	L		N	
05O Mental Health Services 570.201(e)	0	0	0	0											0	0	###	L		N	
05P Screening for Lead-Based Paint/Lead Hazards Poison 570.201(f)	1	0	1	0											0	0	###	L		N	
05Q Subsidize Payments 570.204	0	0	0	0											0	0	###	L		N	
05R Homeownership Assistance (not direct) 570.204	0	0	0	0											0	0	###	L		N	
05S Rental Housing Subsidies (if HOME, not part of 5% 570.204)	0	0	0	0											0	0	###	L		N	
05T Security Deposits (if HOME, not part of 5% Admin c	0	0	0	0											0	0	###	L		N	
06 Interim Assistance 570.201(f)	0	0	0	0											0	0	###	L		N	
07 Urban Renewal Completion 570.201(h)	0	0	0	0											0	0	###	L		N	
08 Relocation 570.201(i)	1	0	1	0											0	0	###	L		N	
09 Loss of Rental Income 570.201(j)	0	0	0	0											0	0	###	L		N	
10 Removal of Architectural Barriers 570.201(k)	4	0	4	1											1	0	0%	M		Y	CDBG
11 Privately Owned Utilities 570.201(l)	0	0	0	0											0	0	###	L		N	
12 Construction of Housing 570.201(m)	0	0	0	0											0	0	###	L		N	
13 Direct Homeownership Assistance 570.201(n)	0	0	0	0											0	0	###	L		N	
14A Rehab: Single-Unit Residential 570.202	110	0	110	25											25	0	0%	H		Y	BG/HO
14B Rehab: Multi-Unit Residential 570.202	1	0	1	0											0	0	###	L		N	
14C Public Housing Modernization 570.202	0	0	0	0											0	0	###	L		N	
14D Rehab: Other Publicly-Owned Residential Buildings 570.202	0	0	0	0											0	0	###	L		N	
14E Rehab: Publicly or Privately-Owned Commercial/Indu 570.202	0	0	0	0											0	0	###	L		N	
14F Energy Efficiency Improvements 570.202	1	0	1	0											0	0	###	L		N	
14G Acquisition - for Rehabilitation 570.202	1	0	1	0											0	0	###	L		N	
14H Rehabilitation Administration 570.202	0	0	0	0											0	0	###	L		N	
14I Lead-Based/Lead Hazard Test/Abate 570.202	1	0	1	0											0	0	###	H		Y	HOME
15 Code Enforcement 570.202(c)	0	0	0	0											0	0	###	M		Y	HOME

Grantee Name: **Jurisdiction**

Non-Homeless Special Needs Including HOPWA

	Needs	Currently Available	GAP	3-5 Year Quantities												Total			Priority Need:	Plan to Fund? Y/N	Fund Source: CD
				Year 1		Year 2		Year 3		Year 4*		Year 5*		Goal	Actual	% of Goal					
				Goal	Complete	Goal	Complete	Goal	Complete	Goal	Complete	Goal	Complete								
Housing Needed	709	330	379	50	0	0	0	0	0	0	0	0	0	0	50	0	0%	H	N	O	
	390	30	360	50	0	0	0	0	0	0	0	0	0	0	50	0	0%	H	N	O	
	647	372	275	100	0	0	0	0	0	0	0	0	0	100	0	0%	H	N	O		
	46	26	20	5	0	0	0	0	0	0	0	0	0	5	0	0%	M	N	O		
	420	242	178	75	0	0	0	0	0	0	0	0	0	75	0	0%	H	N	O		
	129	74	55	60	0	0	0	0	0	0	0	0	0	60	0	0%	H	N	O		
	52	30	22	10	0	0	0	0	0	0	0	0	0	10	0	0%	M	N	O		
	735	735	0	0	0	0	0	0	0	0	0	0	0	0	0	###	L	N	O		
Total	3128	1839	1289	350	0	0	0	0	0	0	0	0	0	350	0	0%					
Supportive Services Needed	709	330	379	50	0	0	0	0	0	0	0	0	0	50	0	0%	H	N	O		
	390	30	360	50	0	0	0	0	0	0	0	0	0	50	0	0%	H	N	O		
	647	372	275	100	0	0	0	0	0	0	0	0	0	100	0	0%	H	N	O		
	46	26	20	5	0	0	0	0	0	0	0	0	0	5	0	0%	M	N	O		
	420	242	178	75	0	0	0	0	0	0	0	0	0	75	0	0%	H	N	O		
	129	74	55	60	0	0	0	0	0	0	0	0	0	60	0	0%	H	N	O		
	52	30	22	10	0	0	0	0	0	0	0	0	0	10	0	0%	M	N	O		
	735	735	0	0	0	0	0	0	0	0	0	0	0	0	0	###	L	N	O		
Total	3128	1839	1289	350	0	0	0	0	0	0	0	0	0	350	0	0%					

SUMMARY OF SPECIFIC
ANNUAL OBJECTIVES



Summary of Specific Annual Objectives

Specific Obj. #	Outcome/Objective Specific Annual Objectives	Sources of Funds	Performance Indicators	Year	Expected Number	Actual Number	Percent Completed	
DH-1 Availability/Accessibility of Decent Housing								
DH-1 (1) 22, 29	Make decent housing more accessible for elderly and disabled homeowners by assisting them to make accessibility improvements.	CDBG	Number of housing units made accessible for elderly and people with disabilities.	2010	4		0%	
				2011	4		0%	
		Source of Funds #2		2012	4		0%	
				2013	4		0%	
		Source of Funds #3		2014	4		0%	
	MULTI-YEAR GOAL					20	0	0%
	Make decent housing more available to people who are homeless or at risk of becoming homeless by providing housing counseling and education services to them.	Source of Funds #1	Number of households provided with housing counseling services.	2010	50		0%	
				2011	50		0%	
		Source of Funds #2		2012	45		0%	
				2013	45		0%	
		Source of Funds #3		2014	45		0%	
	MULTI-YEAR GOAL					235	0	0%
		Source of Funds #1	Performance Indicator #3	2010			#DIV/0!	
				2011			#DIV/0!	
		Source of Funds #2		2012			#DIV/0!	
		2013				#DIV/0!		
	Source of Funds #3	2014				#DIV/0!		
MULTI-YEAR GOAL						0	#DIV/0!	



Summary of Specific Annual Objectives

Specific Obj. #	Outcome/Objective Specific Annual Objectives	Sources of Funds	Performance Indicators	Year	Expected Number	Actual Number	Percent Completed
DH-2 Affordability of Decent Housing							
25, 26	Make decent housing more affordable to low- and moderate-income households by providing financing mechanisms for the development of new low-moderate income affordable homeowner housing.	HOME	Number of new affordable homes built and sold to low-moderate income homebuyers.	2010	1		0%
		Source of Funds #2		2011	1		0%
		Source of Funds #3		2012	1		0%
				2013	1		0%
				2014	1		0%
		MULTI-YEAR GOAL				5	0
	Make decent housing more affordable to low- and moderate-income households by providing them with downpayment and closing cost assistance to enable them to purchase an affordable home.	HOME	Number of households provided with homebuyer assistance.	2010	20		0%
		Source of Funds #2		2011	20		0%
		Source of Funds #3		2012	20		0%
				2013	20		0%
				2014	20		0%
		MULTI-YEAR GOAL				100	0
		Source of Funds #1	Performance Indicator #3	2010			#DIV/0!
		Source of Funds #2		2011			#DIV/0!
		Source of Funds #3		2012			#DIV/0!
		2013				#DIV/0!	
		2014				#DIV/0!	
MULTI-YEAR GOAL					0	#DIV/0!	



Summary of Specific Annual Objectives

Specific Obj. #	Outcome/Objective Specific Annual Objectives	Sources of Funds	Performance Indicators	Year	Expected Number	Actual Number	Percent Completed	
DH-3 Sustainability of Decent Housing								
DH-3 (1) 21, 23	Sustain decent housing by assisting low and moderate-income homeowners in making improvements and repairs to their homes to make them safer, compliant with local building codes and lead safe.	CDBG	Number of housing units repaired.	2010	17		0%	
				2011	17		0%	
		HOME		2012	17		0%	
				2013	17		0%	
		Source of Funds #3		2014	17		0%	
		MULTI-YEAR GOAL				85	0	0%
			CDBG	Number of housing units repaired.	2010	4		0%
					2011	4		0%
		Source of Funds #2	2012		4		0%	
		2013	4			0%		
	Source of Funds #3	2014	4			0%		
	MULTI-YEAR GOAL				20	0	0%	
	Sustain decent housing by assisting low- and moderate-income homeowners in making emergency repairs.	Source of Funds #1	Performance Indicator #3	2010			#DIV/0!	
				2011			#DIV/0!	
		Source of Funds #2		2012			#DIV/0!	
		2013				#DIV/0!		
Source of Funds #3		2014				#DIV/0!		
MULTI-YEAR GOAL					0	#DIV/0!		



Summary of Specific Annual Objectives

Specific Obj. #	Outcome/Objective Specific Annual Objectives	Sources of Funds	Performance Indicators	Year	Expected Number	Actual Number	Percent Completed	
SL-1 Availability/Accessibility of Suitable Living Environment								
SL-1 (1) 1-20, 30	Make a suitable living environment more accessible and available to low- and moderate-income people by assisting with improvements to senior, handicapped and youth centers, neighborhood facilities, parking facilities, solid waste disposal, flood drainage, water and sewer systems, streets, sidewalks, fire stations and equipment, and health facilities in and serving low-moderate income areas.	CDBG	Number of public facility and improvement projects completed.	2010	20		0%	
				2011	20		0%	
		Source of Funds #2		2012	20		0%	
				2013	20		0%	
		Source of Funds #3		2014	20		0%	
		MULTI-YEAR GOAL				100	0	0%
			CDBG	Number of buildings demolished.	2010	4		0%
					2011	4		0%
		Source of Funds #2	2012		4		0%	
					2013	4		0%
	Source of Funds #3	2014	4			0%		
	MULTI-YEAR GOAL				20	0	0%	
	Make a suitable living environment more accessible and available by demolishing unsafe vacant and deteriorated structures.	Source of Funds #1	Performance Indicator #3	2010			#DIV/0!	
				2011			#DIV/0!	
		Source of Funds #2		2012			#DIV/0!	
				2013			#DIV/0!	
		Source of Funds #3		2014			#DIV/0!	
MULTI-YEAR GOAL					0	#DIV/0!		



Summary of Specific Annual Objectives

Specific Obj. #	Outcome/Objective Specific Annual Objectives	Sources of Funds	Performance Indicators	Year	Expected Number	Actual Number	Percent Completed	
EO-1 Availability/Accessibility of Economic Opportunity								
EO-1 (1) 27	Improve/increase the availability/accessibility of economic opportunities through activities that create jobs and increase the County's tax base including land assembly, site preparation, business loans, business marketing, technical assistance and business support programs.	CDBG	Number of jobs created or retained for low-moderate income people.	2010	10		0%	
				2011	10		0%	
		Source of Funds #2		2012	10		0%	
				2013	10		0%	
		Source of Funds #3		2014	10		0%	
		MULTI-YEAR GOAL				50	0	0%
		Source of Funds #1	Performance Indicator #2	2010			#DIV/0!	
				2011			#DIV/0!	
		Source of Funds #2		2012			#DIV/0!	
				2013			#DIV/0!	
	Source of Funds #3	2014				#DIV/0!		
	MULTI-YEAR GOAL					0	#DIV/0!	
	Specific Annual Objective	Source of Funds #1	Performance Indicator #3	2010			#DIV/0!	
				2011			#DIV/0!	
		Source of Funds #2		2012			#DIV/0!	
				2013			#DIV/0!	
		Source of Funds #3		2014			#DIV/0!	
		MULTI-YEAR GOAL					0	#DIV/0!

ANNUAL HOUSING COMPLETION GOALS

TABLE 3B ANNUAL HOUSING COMPLETION GOALS

ANNUAL AFFORDABLE RENTAL HOUSING GOALS (SEC. 215)	Annual Expected Number Completed	Resources used during the period			
		CDBG	HOME	ESG	HOPWA
Acquisition of existing units		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Production of new units		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rehabilitation of existing units		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rental Assistance		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Total Sec. 215 Rental Goals		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ANNUAL AFFORDABLE OWNER HOUSING GOALS (SEC. 215)					
Acquisition of existing units		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Production of new units	1	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rehabilitation of existing units	25	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Homebuyer Assistance	20	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Total Sec. 215 Owner Goals	46	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ANNUAL AFFORDABLE HOUSING GOALS (SEC. 215)					
Homeless		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Non-Homeless		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Special Needs		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Total Sec. 215 Affordable Housing		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ANNUAL HOUSING GOALS					
Annual Rental Housing Goal		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Annual Owner Housing Goal	46	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Total Annual Housing Goal	46	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

For the purpose of identification of annual goals, an assisted household is one that will receive benefits through the investment of Federal funds, either alone or in conjunction with the investment of other public or private funds.

PROJECTS WORKBOOK

Project Name: St. Clair Township Street Improvements					
Description:	IDIS Project #: 1 UOG Code: IL179163 ST CLAIR COUNTY Street, curb and gutter improvements on East Main Street in St. Clair Township				
Location: St. Clair Township CT 5033.32 BG 1	Priority Need Category Select one: Infrastructure				
Expected Completion Date: 9/30/2011	Explanation:				
Objective Category <input type="radio"/> Decent Housing <input checked="" type="radio"/> Suitable Living Environment <input type="radio"/> Economic Opportunity	Specific Objectives				
Outcome Categories <input checked="" type="checkbox"/> Availability/Accessibility <input type="checkbox"/> Affordability <input type="checkbox"/> Sustainability	1, Improve quality / increase quantity of public improvements for lower income persons				
Project-level Accomplishments	01 People	Proposed	30	Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
	Accompl. Type:	Proposed		Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
	Accompl. Type:	Proposed		Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
Proposed Outcome		Performance Measure		Actual Outcome	
03K Street Improvements 570.201(c)		Matrix Codes		Matrix Codes	
Matrix Codes		Matrix Codes		Matrix Codes	
Matrix Codes		Matrix Codes		Matrix Codes	
Program Year 1	CDBG	Proposed Amt.	60000	Fund Source:	Proposed Amt.
		Actual Amount			Actual Amount
	Fund Source:	Proposed Amt.		Fund Source:	Proposed Amt.
		Actual Amount			Actual Amount
	11 Public Facilities	Proposed Units	1	Accompl. Type:	Proposed Units
		Actual Units			Actual Units
	Accompl. Type:	Proposed Units		Accompl. Type:	Proposed Units
		Actual Units			Actual Units

Program Year 2	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 3	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 4	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 5	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	

Project Name: Alorton Street Improvements					
Description:	IDIS Project #: 2 UOG Code: IL179163 ST CLAIR COUNTY Street reconstruction on McCausland Avenue in Alorton.				
Location: Alorton CT 5025.00	Priority Need Category Select one: Public Facilities				
Expected Completion Date: 9/30/2011	Explanation:				
Objective Category <input type="radio"/> Decent Housing <input checked="" type="radio"/> Suitable Living Environment <input type="radio"/> Economic Opportunity	Specific Objectives				
Outcome Categories <input checked="" type="checkbox"/> Availability/Accessibility <input type="checkbox"/> Affordability <input type="checkbox"/> Sustainability	1. Improve quality / increase quantity of public improvements for lower income persons				
Project-level Accomplishments	01 People	Proposed	90	Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
	Accompl. Type:	Proposed		Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
	Accompl. Type:	Proposed		Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
Proposed Outcome		Performance Measure		Actual Outcome	
03K Street Improvements 570.201(c)		Matrix Codes		Matrix Codes	
Matrix Codes		Matrix Codes		Matrix Codes	
Matrix Codes		Matrix Codes		Matrix Codes	
Program Year 1	CDBG	Proposed Amt.	80000	Fund Source:	Proposed Amt.
		Actual Amount			Actual Amount
	Fund Source:	Proposed Amt.		Fund Source:	Proposed Amt.
		Actual Amount			Actual Amount
	11 Public Facilities	Proposed Units	1	Accompl. Type:	Proposed Units
		Actual Units			Actual Units
	Accompl. Type:	Proposed Units		Accompl. Type:	Proposed Units
		Actual Units			Actual Units

Program Year 2	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 3	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 4	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 5	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	

Project Name: Brooklyn Sewer Improvements					
Description: Sanitary sewer lining-Washington, Canal, Monroe	IDIS Project #: 3 UOG Code: IL179163 ST CLAIR COUNTY				
Location: Brooklyn CT 5045.00	Priority Need Category Select one: Infrastructure				
Expected Completion Date: 9/30/2011	Explanation:				
Objective Category <input type="radio"/> Decent Housing <input checked="" type="radio"/> Suitable Living Environment <input type="radio"/> Economic Opportunity	Specific Objectives				
Outcome Categories <input checked="" type="checkbox"/> Availability/Accessibility <input type="checkbox"/> Affordability <input type="checkbox"/> Sustainability	1, Improve quality / increase quantity of public improvements for lower income persons				
Project-level Accomplishments	01 People	Proposed	1000	Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
	Accompl. Type:	Proposed		Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
	Accompl. Type:	Proposed		Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
Proposed Outcome		Performance Measure		Actual Outcome	
03J Water/Sewer Improvements 570.201(c)		Matrix Codes		Matrix Codes	
Matrix Codes		Matrix Codes		Matrix Codes	
Matrix Codes		Matrix Codes		Matrix Codes	
Program Year 1	CDBG	Proposed Amt.	80000	Fund Source:	Proposed Amt.
		Actual Amount			Actual Amount
	Fund Source:	Proposed Amt.		Fund Source:	Proposed Amt.
		Actual Amount			Actual Amount
	11 Public Facilities	Proposed Units	1	Accompl. Type:	Proposed Units
		Actual Units			Actual Units
	Accompl. Type:	Proposed Units		Accompl. Type:	Proposed Units
		Actual Units			Actual Units

Program Year 2	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 3	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 4	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 5	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	

Project Name: Cahokia Sewer Replacement					
Description:	IDIS Project #: 4 UOG Code: IL179163 ST CLAIR COUNTY Sanitary sewer replacement- St. Henry, Gregory, St. Margaret				
Location: Cahokia CT 5023.00	Priority Need Category Select one: Infrastructure				
Expected Completion Date: 9/30/2011	Explanation:				
Objective Category <input type="radio"/> Decent Housing <input checked="" type="radio"/> Suitable Living Environment <input type="radio"/> Economic Opportunity	Specific Objectives				
Outcome Categories <input checked="" type="checkbox"/> Availability/Accessibility <input type="checkbox"/> Affordability <input type="checkbox"/> Sustainability	1, Improve quality / increase quantity of public improvements for lower income persons				
	2,				
	3,				
Project-level Accomplishments	01 People	Proposed	173	Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
	Accompl. Type:	Proposed		Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
	Accompl. Type:	Proposed		Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
Proposed Outcome		Performance Measure		Actual Outcome	
03J Water/Sewer Improvements 570.201(c)		Matrix Codes		Matrix Codes	
Matrix Codes		Matrix Codes		Matrix Codes	
Matrix Codes		Matrix Codes		Matrix Codes	
Program Year 1	CDBG	Proposed Amt.	64000	Fund Source:	Proposed Amt.
		Actual Amount			Actual Amount
	Fund Source:	Proposed Amt.		Fund Source:	Proposed Amt.
		Actual Amount			Actual Amount
	11 Public Facilities	Proposed Units	1	Accompl. Type:	Proposed Units
		Actual Units			Actual Units
	Accompl. Type:	Proposed Units		Accompl. Type:	Proposed Units
		Actual Units			Actual Units

Program Year 2	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 3	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 4	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 5	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	

Project Name: Canteen Township Sewer Improvements					
Description:	IDIS Project #: 5 UOG Code: IL179163 ST CLAIR COUNTY Sanitary sewer line wet well liner.				
Location:	Priority Need Category				
Canteen Township CT 5024.04	Select one: Infrastructure				
Explanation:					
Expected Completion Date:					
9/30/2011					
Objective Category					
<input type="radio"/> Decent Housing					
<input checked="" type="radio"/> Suitable Living Environment					
<input type="radio"/> Economic Opportunity					
Specific Objectives					
Outcome Categories	1. Improve quality / increase quantity of public improvements for lower income persons				
<input checked="" type="checkbox"/> Availability/Accessibility	2.				
<input type="checkbox"/> Affordability	3.				
<input type="checkbox"/> Sustainability					
Project-level Accomplishments	01 People	Proposed	1960	Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
	Accompl. Type:	Proposed		Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
	Accompl. Type:	Proposed		Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
Proposed Outcome		Performance Measure		Actual Outcome	
03J Water/Sewer Improvements 570.201(c)		Matrix Codes		Matrix Codes	
Matrix Codes		Matrix Codes		Matrix Codes	
Matrix Codes		Matrix Codes		Matrix Codes	
Program Year 1	CDBG	Proposed Amt.	64000	Fund Source:	Proposed Amt.
		Actual Amount			Actual Amount
	Fund Source:	Proposed Amt.		Fund Source:	Proposed Amt.
		Actual Amount			Actual Amount
	11 Public Facilities	Proposed Units	1	Accompl. Type:	Proposed Units
		Actual Units			Actual Units
	Accompl. Type:	Proposed Units		Accompl. Type:	Proposed Units
		Actual Units			Actual Units

Program Year 2	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 3	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 4	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 5	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	

Project Name: Caseyville Township Sewer Improvements					
Description:	IDIS Project #: 6 UOG Code: IL179163 ST CLAIR COUNTY Sanitary sewer collection system-Pasadena Drive and Pine Trail				
Location: Caseyville Township CT 5034.02 BG 1	Priority Need Category Select one: Infrastructure				
Expected Completion Date: 9/30/2011	Explanation:				
Objective Category <input type="radio"/> Decent Housing <input checked="" type="radio"/> Suitable Living Environment <input type="radio"/> Economic Opportunity	Specific Objectives				
Outcome Categories <input checked="" type="checkbox"/> Availability/Accessibility <input type="checkbox"/> Affordability <input type="checkbox"/> Sustainability	1. Improve quality / increase quantity of public improvements for lower income persons				
	2.				
	3.				
Project-level Accomplishments	01 People	Proposed	400	Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
	Accompl. Type:	Proposed		Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
	Accompl. Type:	Proposed		Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
Proposed Outcome		Performance Measure		Actual Outcome	
03J Water/Sewer Improvements 570.201(c)		Matrix Codes		Matrix Codes	
Matrix Codes		Matrix Codes		Matrix Codes	
Matrix Codes		Matrix Codes		Matrix Codes	
Program Year 1	CDBG	Proposed Amt.	64000	Fund Source:	Proposed Amt.
		Actual Amount			Actual Amount
	Fund Source:	Proposed Amt.		Fund Source:	Proposed Amt.
		Actual Amount			Actual Amount
	11 Public Facilities	Proposed Units	1	Accompl. Type:	Proposed Units
		Actual Units			Actual Units
	Accompl. Type:	Proposed Units		Accompl. Type:	Proposed Units
		Actual Units			Actual Units

Program Year 2	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 3	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 4	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 5	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	

Project Name: Centreville Drainage and Road Improvements					
Description:	IDIS Project #: 7 IL179163 ST CLAIR COUNTY 52nd, 53rd, 54th, 55th and Market drainage and road improvements				
Location: Centreville CT 5028.00	Priority Need Category Select one: Infrastructure				
Expected Completion Date: 9/30/2011	Explanation:				
Objective Category <input type="radio"/> Decent Housing <input checked="" type="radio"/> Suitable Living Environment <input type="radio"/> Economic Opportunity	Specific Objectives				
Outcome Categories <input checked="" type="checkbox"/> Availability/Accessibility <input type="checkbox"/> Affordability <input type="checkbox"/> Sustainability	1. Improve quality / increase quantity of public improvements for lower income persons				
	2.				
	3.				
Project-level Accomplishments	01 People	Proposed	1500	Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
	Accompl. Type:	Proposed		Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
	Accompl. Type:	Proposed		Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
Proposed Outcome	Performance Measure	Actual Outcome			
03K Street Improvements 570.201(c)		Matrix Codes			
Matrix Codes		Matrix Codes			
Matrix Codes		Matrix Codes			
Program Year 1	CDBG	Proposed Amt.	60000	Fund Source:	Proposed Amt.
		Actual Amount			Actual Amount
	Fund Source:	Proposed Amt.		Fund Source:	Proposed Amt.
		Actual Amount			Actual Amount
	11 Public Facilities	Proposed Units	1	Accompl. Type:	Proposed Units
		Actual Units			Actual Units
	Accompl. Type:	Proposed Units		Accompl. Type:	Proposed Units
		Actual Units			Actual Units

Program Year 2	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 3	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 4	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 5	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	

Project Name: East Carondelet Storm Water Pump Station Improvements					
Description: 5th Street storm water pump station improvements	IDIS Project #: 8 UOG Code: IL179163 ST CLAIR COUNTY				
Location: East Carondelet CT 5031.00 BG 1	Priority Need Category Select one: Infrastructure				
Expected Completion Date: 9/30/2011	Explanation:				
Objective Category <input type="radio"/> Decent Housing <input checked="" type="radio"/> Suitable Living Environment <input type="radio"/> Economic Opportunity	Specific Objectives				
Outcome Categories <input checked="" type="checkbox"/> Availability/Accessibility <input type="checkbox"/> Affordability <input type="checkbox"/> Sustainability	1. Improve quality / increase quantity of public improvements for lower income persons				
	2.				
	3.				
Project-level Accomplishments	01 People	Proposed	100	Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
	Accompl. Type:	Proposed		Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
	Accompl. Type:	Proposed		Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
Proposed Outcome		Performance Measure		Actual Outcome	
03J Water/Sewer Improvements 570.201(c)		Matrix Codes		Matrix Codes	
Matrix Codes		Matrix Codes		Matrix Codes	
Matrix Codes		Matrix Codes		Matrix Codes	
Program Year 1	CDBG	Proposed Amt.	42400	Fund Source:	Proposed Amt.
		Actual Amount			Actual Amount
	Fund Source:	Proposed Amt.		Fund Source:	Proposed Amt.
		Actual Amount			Actual Amount
	11 Public Facilities	Proposed Units	1	Accompl. Type:	Proposed Units
		Actual Units			Actual Units
	Accompl. Type:	Proposed Units		Accompl. Type:	Proposed Units
		Actual Units			Actual Units

Program Year 2	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 3	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 4	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 5	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	

Project Name: Fairmont City Sewer Improvements					
Description:	IDIS Project #: 9 UOG Code: IL179163 ST CLAIR COUNTY Cookson Road sewer trunk line rehabilitation				
Location: Fairmont City CT 5021.00	Priority Need Category Select one: Infrastructure				
Expected Completion Date: 9/30/2011	Explanation:				
Objective Category <input type="radio"/> Decent Housing <input checked="" type="radio"/> Suitable Living Environment <input type="radio"/> Economic Opportunity	Specific Objectives				
Outcome Categories <input checked="" type="checkbox"/> Availability/Accessibility <input type="checkbox"/> Affordability <input type="checkbox"/> Sustainability	1. Improve quality / increase quantity of public improvements for lower income persons				
	2.				
	3.				
Project-level Accomplishments	01 People	Proposed	810	Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
	Accompl. Type:	Proposed		Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
	Accompl. Type:	Proposed		Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
Proposed Outcome		Performance Measure		Actual Outcome	
03J Water/Sewer Improvements 570.201(c)		Matrix Codes		Matrix Codes	
Matrix Codes		Matrix Codes		Matrix Codes	
Matrix Codes		Matrix Codes		Matrix Codes	
Program Year 1	CDBG	Proposed Amt.	64000	Fund Source:	Proposed Amt.
		Actual Amount			Actual Amount
	Fund Source:	Proposed Amt.		Fund Source:	Proposed Amt.
		Actual Amount			Actual Amount
	11 Public Facilities	Proposed Units	1	Accompl. Type:	Proposed Units
		Actual Units			Actual Units
	Accompl. Type:	Proposed Units		Accompl. Type:	Proposed Units
		Actual Units			Actual Units

Program Year 2	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 3	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 4	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 5	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	

Project Name: Fairview Heights Street Improvements					
Description:	IDIS Project #: 10 UOG Code: IL179163 ST CLAIR COUNTY				
Third Avenue street improvements					
Location:	Priority Need Category				
Fairview Heights CT 5024.04	Select one: Infrastructure ▼				
Explanation:					
Expected Completion Date:	<table border="1"> <tr> <td>Objective Category</td> </tr> <tr> <td><input type="radio"/> Decent Housing</td> </tr> <tr> <td><input checked="" type="radio"/> Suitable Living Environment</td> </tr> <tr> <td><input type="radio"/> Economic Opportunity</td> </tr> </table>	Objective Category	<input type="radio"/> Decent Housing	<input checked="" type="radio"/> Suitable Living Environment	<input type="radio"/> Economic Opportunity
Objective Category					
<input type="radio"/> Decent Housing					
<input checked="" type="radio"/> Suitable Living Environment					
<input type="radio"/> Economic Opportunity					
9/30/2011					
<table border="1"> <tr> <td>Outcome Categories</td> </tr> <tr> <td><input checked="" type="checkbox"/> Availability/Accessibility</td> </tr> <tr> <td><input type="checkbox"/> Affordability</td> </tr> <tr> <td><input type="checkbox"/> Sustainability</td> </tr> </table>	Outcome Categories	<input checked="" type="checkbox"/> Availability/Accessibility	<input type="checkbox"/> Affordability	<input type="checkbox"/> Sustainability	
Outcome Categories					
<input checked="" type="checkbox"/> Availability/Accessibility					
<input type="checkbox"/> Affordability					
<input type="checkbox"/> Sustainability					
Specific Objectives					
	1, Improve quality / increase quantity of public improvements for lower income persons ▼				
	2, ▼				
	3, ▼				
Project-level Accomplishments	01 People ▼	Proposed	30	Accompl. Type: ▼	Proposed
		Underway			Underway
		Complete			Complete
	Accompl. Type: ▼	Proposed		Accompl. Type: ▼	Proposed
		Underway			Underway
		Complete			Complete
	Accompl. Type: ▼	Proposed		Accompl. Type: ▼	Proposed
		Underway			Underway
		Complete			Complete
Proposed Outcome		Performance Measure		Actual Outcome	
03K Street Improvements 570.201(c) ▼		Matrix Codes ▼		Matrix Codes ▼	
Matrix Codes ▼		Matrix Codes ▼		Matrix Codes ▼	
Matrix Codes ▼		Matrix Codes ▼		Matrix Codes ▼	
Program Year 1	CDBG ▼	Proposed Amt.	60000	Fund Source: ▼	Proposed Amt.
		Actual Amount			Actual Amount
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.
		Actual Amount			Actual Amount
	11 Public Facilities ▼	Proposed Units	1	Accompl. Type: ▼	Proposed Units
		Actual Units			Actual Units
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units
		Actual Units			Actual Units

Program Year 2	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 3	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 4	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 5	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	

Project Name: Freeburg Township Hall Accessibility Improvements									
Description:	IDIS Project #: 11 UOG Code: IL179163 ST CLAIR COUNTY Freeburg Township Hall accessibility improvements-vestibule removal and replacement								
Location:	Priority Need Category								
Freeburg Township CT 5039.02 BG 2	Select one: Public Facilities ▼								
Explanation:									
Expected Completion Date:	<table border="1"> <tr> <td colspan="2">Specific Objectives</td> </tr> <tr> <td>1</td> <td>Improve quality / increase quantity of public improvements for lower income persons ▼</td> </tr> <tr> <td>2</td> <td>▼</td> </tr> <tr> <td>3</td> <td>▼</td> </tr> </table>	Specific Objectives		1	Improve quality / increase quantity of public improvements for lower income persons ▼	2	▼	3	▼
Specific Objectives									
1		Improve quality / increase quantity of public improvements for lower income persons ▼							
2	▼								
3	▼								
9/30/2011									
<table border="1"> <tr> <td colspan="2">Objective Category</td> </tr> <tr> <td><input type="radio"/></td> <td>Decent Housing</td> </tr> <tr> <td><input checked="" type="radio"/></td> <td>Suitable Living Environment</td> </tr> <tr> <td><input type="radio"/></td> <td>Economic Opportunity</td> </tr> </table>	Objective Category		<input type="radio"/>	Decent Housing	<input checked="" type="radio"/>	Suitable Living Environment	<input type="radio"/>	Economic Opportunity	
Objective Category									
<input type="radio"/>	Decent Housing								
<input checked="" type="radio"/>	Suitable Living Environment								
<input type="radio"/>	Economic Opportunity								
<table border="1"> <tr> <td colspan="2">Outcome Categories</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>Availability/Accessibility</td> </tr> <tr> <td><input type="checkbox"/></td> <td>Affordability</td> </tr> <tr> <td><input type="checkbox"/></td> <td>Sustainability</td> </tr> </table>	Outcome Categories		<input checked="" type="checkbox"/>	Availability/Accessibility	<input type="checkbox"/>	Affordability	<input type="checkbox"/>	Sustainability	
Outcome Categories									
<input checked="" type="checkbox"/>	Availability/Accessibility								
<input type="checkbox"/>	Affordability								
<input type="checkbox"/>	Sustainability								
Project-level Accomplishments	01 People ▼	Proposed	5124	Accompl. Type: ▼	Proposed				
		Underway			Underway				
		Complete			Complete				
	Accompl. Type: ▼	Proposed		Accompl. Type: ▼	Proposed				
		Underway			Underway				
		Complete			Complete				
	Accompl. Type: ▼	Proposed		Accompl. Type: ▼	Proposed				
		Underway			Underway				
		Complete			Complete				
Proposed Outcome		Performance Measure		Actual Outcome					
10 Removal of Architectural Barriers 570.201(k) ▼		Matrix Codes ▼		Matrix Codes ▼					
Matrix Codes ▼		Matrix Codes ▼		Matrix Codes ▼					
Matrix Codes ▼		Matrix Codes ▼		Matrix Codes ▼					
Program Year 1	CDBG ▼	Proposed Amt.	64000	Fund Source: ▼	Proposed Amt.				
		Actual Amount			Actual Amount				
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.				
		Actual Amount			Actual Amount				
	11 Public Facilities ▼	Proposed Units	1	Accompl. Type: ▼	Proposed Units				
		Actual Units			Actual Units				
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units				
		Actual Units			Actual Units				

Program Year 2	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 3	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 4	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 5	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	

Project Name: Lenzburg Sewer Improvements					
Description:	IDIS Project #: 12 UOG Code: IL179163 ST CLAIR COUNTY Elm and Locust sanitary sewer main replacement				
Location: Lenzburg CT 5040.02	Priority Need Category Select one: Infrastructure				
Expected Completion Date: 9/30/2011	Explanation:				
Objective Category <input type="radio"/> Decent Housing <input checked="" type="radio"/> Suitable Living Environment <input type="radio"/> Economic Opportunity	Specific Objectives				
Outcome Categories <input checked="" type="checkbox"/> Availability/Accessibility <input type="checkbox"/> Affordability <input type="checkbox"/> Sustainability	1. Improve quality / increase quantity of public improvements for lower income persons				
	2.				
	3.				
Project-level Accomplishments	01 People	Proposed	590	Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
	Accompl. Type:	Proposed		Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
	Accompl. Type:	Proposed		Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
Proposed Outcome		Performance Measure		Actual Outcome	
03J Water/Sewer Improvements 570.201(c)		Matrix Codes		Matrix Codes	
Matrix Codes		Matrix Codes		Matrix Codes	
Matrix Codes		Matrix Codes		Matrix Codes	
Program Year 1	CDBG	Proposed Amt.	56160	Fund Source:	Proposed Amt.
		Actual Amount			Actual Amount
	Fund Source:	Proposed Amt.		Fund Source:	Proposed Amt.
		Actual Amount			Actual Amount
	11 Public Facilities	Proposed Units	1	Accompl. Type:	Proposed Units
		Actual Units			Actual Units
	Accompl. Type:	Proposed Units		Accompl. Type:	Proposed Units
		Actual Units			Actual Units

Program Year 2	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 3	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 4	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 5	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	

Project Name: Marissa Sewer Improvements					
Description: Park Street sanitary sewer replacement	IDIS Project #: 13 UOG Code: IL179163 ST CLAIR COUNTY				
Location: Marissa CT 5040.02 BG 5	Priority Need Category Select one: Infrastructure				
Expected Completion Date: 9/30/2011	Explanation:				
Objective Category <input type="radio"/> Decent Housing <input checked="" type="radio"/> Suitable Living Environment <input type="radio"/> Economic Opportunity	Specific Objectives				
Outcome Categories <input checked="" type="checkbox"/> Availability/Accessibility <input type="checkbox"/> Affordability <input type="checkbox"/> Sustainability	1. Improve quality / increase quantity of public improvements for lower income persons				
	2.				
	3.				
Project-level Accomplishments	01 People	Proposed	2107	Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
	Accompl. Type:	Proposed		Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
	Accompl. Type:	Proposed		Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
Proposed Outcome	Performance Measure	Actual Outcome			
03J Water/Sewer Improvements 570.201(c)	Matrix Codes	Matrix Codes			
Matrix Codes	Matrix Codes	Matrix Codes			
Matrix Codes	Matrix Codes	Matrix Codes			
Program Year 1	CDBG	Proposed Amt.	64000	Fund Source:	Proposed Amt.
		Actual Amount			Actual Amount
	Fund Source:	Proposed Amt.		Fund Source:	Proposed Amt.
		Actual Amount			Actual Amount
	11 Public Facilities	Proposed Units	1	Accompl. Type:	Proposed Units
		Actual Units			Actual Units
	Accompl. Type:	Proposed Units		Accompl. Type:	Proposed Units
		Actual Units			Actual Units

Program Year 2	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 3	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 4	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 5	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	

Project Name: Millstadt Township Senior Center					
Description:	IDIS Project #: 14 UOG Code: IL179163 ST CLAIR COUNTY S. Jefferson Senior Center elevator emergency phone alarm installation				
Location:	Priority Need Category				
Millstadt Township CT 5032.03	Select one: Public Facilities ▼				
Explanation:					
Expected Completion Date:	Specific Objectives				
9/30/2011					
Objective Category <input type="radio"/> Decent Housing <input checked="" type="radio"/> Suitable Living Environment <input type="radio"/> Economic Opportunity					
Outcome Categories	1, Improve quality / increase quantity of neighborhood facilities for low-income persons ▼				
<input checked="" type="checkbox"/> Availability/Accessibility	2, ▼				
<input type="checkbox"/> Affordability	3, ▼				
<input type="checkbox"/> Sustainability					
Project-level Accomplishments	11 Public Facilities ▼	Proposed	1	Accompl. Type: ▼	Proposed
		Underway			Underway
		Complete			Complete
	Accompl. Type: ▼	Proposed		Accompl. Type: ▼	Proposed
		Underway			Underway
		Complete			Complete
	Accompl. Type: ▼	Proposed		Accompl. Type: ▼	Proposed
		Underway			Underway
		Complete			Complete
Proposed Outcome		Performance Measure		Actual Outcome	
03A Senior Centers 570.201(c) ▼		Matrix Codes ▼		Matrix Codes ▼	
Matrix Codes ▼		Matrix Codes ▼		Matrix Codes ▼	
Matrix Codes ▼		Matrix Codes ▼		Matrix Codes ▼	
Program Year 1	CDBG ▼	Proposed Amt.	2198	Fund Source: ▼	Proposed Amt.
		Actual Amount			Actual Amount
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.
		Actual Amount			Actual Amount
	11 Public Facilities ▼	Proposed Units	1	Accompl. Type: ▼	Proposed Units
		Actual Units			Actual Units
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units
		Actual Units			Actual Units

Program Year 2	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 3	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 4	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 5	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	

Project Name: New Athens Water Line Improvements					
Description: S. Johnson Street water line replacement	IDIS Project #: 15 UOG Code: IL179163 ST CLAIR COUNTY				
Location: New Athens CT 5040.01 BG 3	Priority Need Category: Select one: Infrastructure ▼ Explanation:				
Expected Completion Date: 9/30/2011	Objective Category <input type="radio"/> Decent Housing <input checked="" type="radio"/> Suitable Living Environment <input type="radio"/> Economic Opportunity				
Outcome Categories <input checked="" type="checkbox"/> Availability/Accessibility <input type="checkbox"/> Affordability <input type="checkbox"/> Sustainability					
Specific Objectives					
1, Improve quality / increase quantity of public improvements for lower income persons ▼					
2, ▼					
3, ▼					
Project-level Accomplishments	01 People ▼	Proposed	110	Accompl. Type: ▼	Proposed
		Underway			Underway
		Complete			Complete
	Accompl. Type: ▼	Proposed		Accompl. Type: ▼	Proposed
		Underway			Underway
		Complete			Complete
	Accompl. Type: ▼	Proposed		Accompl. Type: ▼	Proposed
		Underway			Underway
		Complete			Complete
Proposed Outcome		Performance Measure		Actual Outcome	
03J Water/Sewer Improvements 570.201(c) ▼		Matrix Codes ▼		Matrix Codes ▼	
Matrix Codes ▼		Matrix Codes ▼		Matrix Codes ▼	
Matrix Codes ▼		Matrix Codes ▼		Matrix Codes ▼	
Program Year 1	CDBG ▼	Proposed Amt.	42800	Fund Source: ▼	Proposed Amt.
		Actual Amount			Actual Amount
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.
		Actual Amount			Actual Amount
	11 Public Facilities ▼	Proposed Units	1	Accompl. Type: ▼	Proposed Units
		Actual Units			Actual Units
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units
		Actual Units			Actual Units

Program Year 2	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 3	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 4	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 5	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	

Project Name: O'Fallon Township Drainage Improvements						
Description:	IDIS Project #: 16 UOG Code: IL179163 ST CLAIR COUNTY Behrens and Carson Drive storm water drainage improvements					
Location:	Priority Need Category					
O'Fallon Township CT 5043.51 BG 1	Select one: Infrastructure					
Explanation:						
Expected Completion Date:						
9/30/2011						
Objective Category						
<input type="radio"/> Decent Housing						
<input checked="" type="radio"/> Suitable Living Environment						
<input type="radio"/> Economic Opportunity						
Specific Objectives						
Outcome Categories	1 Improve quality / increase quantity of public improvements for lower income persons					
<input checked="" type="checkbox"/> Availability/Accessibility	2					
<input type="checkbox"/> Affordability	3					
<input type="checkbox"/> Sustainability						
Project-level Accomplishments	11 Public Facilities	Proposed	1	Accompl. Type:	Proposed	
		Underway			Underway	
		Complete			Complete	
	Accompl. Type:	Proposed		Accompl. Type:	Proposed	
		Underway			Underway	
		Complete			Complete	
	Accompl. Type:	Proposed		Accompl. Type:	Proposed	
		Underway			Underway	
		Complete			Complete	
Proposed Outcome		Performance Measure		Actual Outcome		
03I Flood Drain Improvements 570.201(c)		Matrix Codes		Matrix Codes		
Matrix Codes		Matrix Codes		Matrix Codes		
Matrix Codes		Matrix Codes		Matrix Codes		
Program Year 1	CDBG	Proposed Amt.	60000	Fund Source:	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source:	Proposed Amt.		Fund Source:	Proposed Amt.	
		Actual Amount			Actual Amount	
	11 Public Facilities	Proposed Units	1	Accompl. Type:	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type:	Proposed Units		Accompl. Type:	Proposed Units	
		Actual Units			Actual Units	

Program Year 2	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 3	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 4	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 5	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	

Project Name: Shiloh Street Improvements					
Description:	IDIS Project #: 17 UOG Code: IL179163 ST CLAIR COUNTY High, Oak and Church Street curb and gutter storm sewer construction				
Location: Shiloh CT 5039.01 BG 1	Priority Need Category Select one: Infrastructure				
Expected Completion Date: 9/30/2011	Explanation:				
Objective Category <input type="radio"/> Decent Housing <input checked="" type="radio"/> Suitable Living Environment <input type="radio"/> Economic Opportunity	Specific Objectives				
Outcome Categories <input checked="" type="checkbox"/> Availability/Accessibility <input type="checkbox"/> Affordability <input type="checkbox"/> Sustainability	1. Improve quality / increase quantity of public improvements for lower income persons				
	2.				
	3.				
Project-level Accomplishments	01 People	Proposed	130	Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
	Accompl. Type:	Proposed		Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
	Accompl. Type:	Proposed		Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
Proposed Outcome		Performance Measure		Actual Outcome	
03K Street Improvements 570.201(c)		Matrix Codes		Matrix Codes	
Matrix Codes		Matrix Codes		Matrix Codes	
Matrix Codes		Matrix Codes		Matrix Codes	
Program Year 1	CDBG	Proposed Amt.	60000	Fund Source:	Proposed Amt.
		Actual Amount			Actual Amount
	Fund Source:	Proposed Amt.		Fund Source:	Proposed Amt.
		Actual Amount			Actual Amount
	11 Public Facilities	Proposed Units	1	Accompl. Type:	Proposed Units
		Actual Units			Actual Units
	Accompl. Type:	Proposed Units		Accompl. Type:	Proposed Units
		Actual Units			Actual Units

Program Year 2	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 3	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 4	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 5	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	

Project Name: Swanssea Sewer Improvements					
Description:	IDIS Project #: 18 UOG Code: IL179163 ST CLAIR COUNTY Penrose Drive and Kenwood Drive sewer line slip lining				
Location: Swanssea CT 5033.01 BG 4	Priority Need Category Select one: Infrastructure				
Expected Completion Date: 9/30/2011	Explanation:				
Objective Category <input type="radio"/> Decent Housing <input checked="" type="radio"/> Suitable Living Environment <input type="radio"/> Economic Opportunity	Specific Objectives				
Outcome Categories <input checked="" type="checkbox"/> Availability/Accessibility <input type="checkbox"/> Affordability <input type="checkbox"/> Sustainability	1. Improve quality / increase quantity of public improvements for lower income persons				
	2.				
	3.				
Project-level Accomplishments	01 People	Proposed	96	Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
	Accompl. Type:	Proposed		Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
	Accompl. Type:	Proposed		Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
Proposed Outcome		Performance Measure		Actual Outcome	
03J Water/Sewer Improvements 570.201(c)		Matrix Codes		Matrix Codes	
Matrix Codes		Matrix Codes		Matrix Codes	
Matrix Codes		Matrix Codes		Matrix Codes	
Program Year 1	CDBG	Proposed Amt.	48000	Fund Source:	Proposed Amt.
		Actual Amount			Actual Amount
	Fund Source:	Proposed Amt.		Fund Source:	Proposed Amt.
		Actual Amount			Actual Amount
	11 Public Facilities	Proposed Units	1	Accompl. Type:	Proposed Units
		Actual Units			Actual Units
	Accompl. Type:	Proposed Units		Accompl. Type:	Proposed Units
		Actual Units			Actual Units

Program Year 2	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 3	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 4	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 5	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	

Project Name: Washington Park Street Improvements					
Description:	IDIS Project #: 19 UOG Code: IL179163 ST CLAIR COUNTY Westmoreland, Hallows street drainage improvements				
Location: Washington Park CT 5022.00	Priority Need Category Select one: Infrastructure				
Expected Completion Date: 9/30/2011	Explanation:				
Objective Category <input type="radio"/> Decent Housing <input checked="" type="radio"/> Suitable Living Environment <input type="radio"/> Economic Opportunity	Specific Objectives				
Outcome Categories <input checked="" type="checkbox"/> Availability/Accessibility <input type="checkbox"/> Affordability <input type="checkbox"/> Sustainability	1, Improve quality / increase quantity of public improvements for lower income persons				
Project-level Accomplishments	11 Public Facilities	Proposed	1	Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
	Accompl. Type:	Proposed		Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
	Accompl. Type:	Proposed		Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
Proposed Outcome	Performance Measure	Actual Outcome			
03I Flood Drain Improvements 570.201(c)		Matrix Codes			
Matrix Codes		Matrix Codes			
Matrix Codes		Matrix Codes			
Program Year 1	CDBG	Proposed Amt.	80000	Fund Source:	Proposed Amt.
		Actual Amount			Actual Amount
	Fund Source:	Proposed Amt.		Fund Source:	Proposed Amt.
		Actual Amount			Actual Amount
	11 Public Facilities	Proposed Units	1	Accompl. Type:	Proposed Units
		Actual Units			Actual Units
	Accompl. Type:	Proposed Units		Accompl. Type:	Proposed Units
		Actual Units			Actual Units

Program Year 2	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 3	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 4	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 5	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	

Project Name: Belleville Street Improvements					
Description: 21st, 22nd and Washington street resurfacing and reconstruction	IDIS Project #: 20 UOG Code: IL179163 ST CLAIR COUNTY				
Location: Belleville CT 5016.03 BG 1 and 2	Priority Need Category Select one: Infrastructure				
Expected Completion Date: 9/30/2011	Explanation:				
Objective Category <input type="radio"/> Decent Housing <input checked="" type="radio"/> Suitable Living Environment <input type="radio"/> Economic Opportunity	Specific Objectives				
Outcome Categories <input checked="" type="checkbox"/> Availability/Accessibility <input type="checkbox"/> Affordability <input type="checkbox"/> Sustainability	1, Improve quality / increase quantity of public improvements for lower income persons				
Project-level Accomplishments	01 People	Proposed	1261	Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
	Accompl. Type:	Proposed		Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
	Accompl. Type:	Proposed		Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
Proposed Outcome		Performance Measure		Actual Outcome	
03K Street Improvements 570.201(c)		Matrix Codes		Matrix Codes	
Matrix Codes		Matrix Codes		Matrix Codes	
Matrix Codes		Matrix Codes		Matrix Codes	
Program Year 1	CDBG	Proposed Amt.	478405	Fund Source:	Proposed Amt.
		Actual Amount			Actual Amount
	Fund Source:	Proposed Amt.		Fund Source:	Proposed Amt.
		Actual Amount			Actual Amount
	11 Public Facilities	Proposed Units	1	Accompl. Type:	Proposed Units
		Actual Units			Actual Units
	Accompl. Type:	Proposed Units		Accompl. Type:	Proposed Units
		Actual Units			Actual Units

Program Year 2	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 3	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 4	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 5	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	

Project Name: Home Rehab Program					
Description:	IDIS Project #: 21 UOG Code: IL179163 ST CLAIR COUNTY Grants and loans to low-moderate income homeowners for home repairs.				
Location: Areawide	Priority Need Category Select one: Owner Occupied Housing				
Expected Completion Date: 9/30/2011	Explanation:				
Objective Category <input checked="" type="radio"/> Decent Housing <input type="radio"/> Suitable Living Environment <input type="radio"/> Economic Opportunity	Specific Objectives				
Outcome Categories <input type="checkbox"/> Availability/Accessibility <input type="checkbox"/> Affordability <input checked="" type="checkbox"/> Sustainability	1. Improve the quality of owner housing				
	2.				
	3.				
Project-level Accomplishments	10 Housing Units	Proposed	17	Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
	Accompl. Type:	Proposed		Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
	Accompl. Type:	Proposed		Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
Proposed Outcome		Performance Measure		Actual Outcome	
14A Rehab; Single-Unit Residential 570.202		Matrix Codes		Matrix Codes	
Matrix Codes		Matrix Codes		Matrix Codes	
Matrix Codes		Matrix Codes		Matrix Codes	
Program Year 1	CDBG	Proposed Amt.	83807	Fund Source:	Proposed Amt.
		Actual Amount			Actual Amount
	HOME	Proposed Amt.	666167	Fund Source:	Proposed Amt.
		Actual Amount			Actual Amount
	10 Housing Units	Proposed Units	2	Accompl. Type:	Proposed Units
		Actual Units			Actual Units
	10 Housing Units	Proposed Units	15	Accompl. Type:	Proposed Units
		Actual Units			Actual Units

Program Year 2	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 3	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 4	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 5	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	

Project Name: Home Accessibility Program					
Description:	IDIS Project #: 22 UOG Code: IL179163 ST CLAIR COUNTY Grants to low-income home owners for home accessibility improvements.				
Location: Areawide	Priority Need Category Select one: Owner Occupied Housing				
Expected Completion Date: 9/30/2011	Explanation:				
Objective Category <input checked="" type="radio"/> Decent Housing <input type="radio"/> Suitable Living Environment <input type="radio"/> Economic Opportunity	Specific Objectives				
Outcome Categories <input checked="" type="checkbox"/> Availability/Accessibility <input type="checkbox"/> Affordability <input type="checkbox"/> Sustainability	1. Improve the quality of owner housing				
	2.				
	3.				
Project-level Accomplishments	10 Housing Units	Proposed	4	Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
	Accompl. Type:	Proposed		Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
	Accompl. Type:	Proposed		Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
Proposed Outcome		Performance Measure		Actual Outcome	
10 Removal of Architectural Barriers 570.201(k)		Matrix Codes		Matrix Codes	
Matrix Codes		Matrix Codes		Matrix Codes	
Matrix Codes		Matrix Codes		Matrix Codes	
Program Year 1	CDBG	Proposed Amt.	12000	Fund Source:	Proposed Amt.
		Actual Amount			Actual Amount
	Fund Source:	Proposed Amt.		Fund Source:	Proposed Amt.
		Actual Amount			Actual Amount
	10 Housing Units	Proposed Units	4	Accompl. Type:	Proposed Units
		Actual Units			Actual Units
	Accompl. Type:	Proposed Units		Accompl. Type:	Proposed Units
		Actual Units			Actual Units

Program Year 2	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 3	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 4	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 5	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	

Project Name: Emergency Home Repair Program					
Description:	IDIS Project #: 23 UOG Code: IL179163 ST CLAIR COUNTY Grants and loans to low-moderate income home owners for emergency home repairs.				
Location: Areawide	Priority Need Category Select one: Owner Occupied Housing				
Expected Completion Date: 9/30/2011	Explanation:				
Objective Category <input checked="" type="radio"/> Decent Housing <input type="radio"/> Suitable Living Environment <input type="radio"/> Economic Opportunity	Specific Objectives				
Outcome Categories <input type="checkbox"/> Availability/Accessibility <input type="checkbox"/> Affordability <input checked="" type="checkbox"/> Sustainability	1. Improve the quality of owner housing				
	2.				
	3.				
Project-level Accomplishments	10 Housing Units	Proposed	4	Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
	Accompl. Type:	Proposed		Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
	Accompl. Type:	Proposed		Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
Proposed Outcome		Performance Measure		Actual Outcome	
14A Rehab; Single-Unit Residential 570.202		Matrix Codes		Matrix Codes	
Matrix Codes		Matrix Codes		Matrix Codes	
Matrix Codes		Matrix Codes		Matrix Codes	
Program Year 1	CDBG	Proposed Amt.	50000	Fund Source:	Proposed Amt.
		Actual Amount			Actual Amount
	Fund Source:	Proposed Amt.		Fund Source:	Proposed Amt.
		Actual Amount			Actual Amount
	10 Housing Units	Proposed Units	4	Accompl. Type:	Proposed Units
		Actual Units			Actual Units
	Accompl. Type:	Proposed Units		Accompl. Type:	Proposed Units
		Actual Units			Actual Units

Program Year 2	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 3	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 4	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 5	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	

Project Name: Rehab Administration					
Description:	IDIS Project #: 24 UOG Code: IL179163 ST CLAIR COUNTY Administration of the CDBG and HOME-funded housing rehabilitation programs.				
Location: St. Clair County Intergovernmental Grants Department-19 Public Square, Suite 200, Belleville, IL 62220-1624	Priority Need Category Select one: Owner Occupied Housing ▼ Explanation:				
Expected Completion Date: 9/30/2011	Specific Objectives 1, Improve the quality of owner housing ▼ 2, ▼ 3, ▼				
Objective Category <input checked="" type="radio"/> Decent Housing <input type="radio"/> Suitable Living Environment <input type="radio"/> Economic Opportunity					
Outcome Categories <input checked="" type="checkbox"/> Availability/Accessibility <input checked="" type="checkbox"/> Affordability <input checked="" type="checkbox"/> Sustainability					
Project-level Accomplishments	09 Organizations ▼	Proposed	1	Accompl. Type: ▼	Proposed
		Underway			Underway
		Complete			Complete
	Accompl. Type: ▼	Proposed		Accompl. Type: ▼	Proposed
		Underway			Underway
		Complete			Complete
	Accompl. Type: ▼	Proposed		Accompl. Type: ▼	Proposed
		Underway			Underway
		Complete			Complete
Proposed Outcome		Performance Measure		Actual Outcome	
14H Rehabilitation Administration 570.202 ▼		Matrix Codes ▼		Matrix Codes ▼	
Matrix Codes ▼		Matrix Codes ▼		Matrix Codes ▼	
Matrix Codes ▼		Matrix Codes ▼		Matrix Codes ▼	
Program Year 1	CDBG ▼	Proposed Amt.	58587	Fund Source: ▼	Proposed Amt.
		Actual Amount			Actual Amount
	HOME ▼	Proposed Amt.	73000	Fund Source: ▼	Proposed Amt.
		Actual Amount			Actual Amount
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units
		Actual Units			Actual Units
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units
		Actual Units			Actual Units

Program Year 2	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 3	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 4	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 5	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	

Project Name: Affordable Homes Development					
Description:	IDIS Project #: 25 UOG Code: IL179163 ST CLAIR COUNTY				
Financing mechanisms for the construction of new homeowner housing affordable to low-moderate income households.					
Location:	Priority Need Category				
Areawide	Select one: Owner Occupied Housing ▼				
Explanation:					
Expected Completion Date:					
9/30/2011					
Objective Category					
<input checked="" type="radio"/> Decent Housing					
<input type="radio"/> Suitable Living Environment					
<input type="radio"/> Economic Opportunity					
Specific Objectives					
Outcome Categories	1, Increase the availability of affordable owner housing ▼				
<input type="checkbox"/> Availability/Accessibility	2, ▼				
<input checked="" type="checkbox"/> Affordability	3, ▼				
<input type="checkbox"/> Sustainability					
Project-level Accomplishments	10 Housing Units ▼	Proposed	1	Accompl. Type: ▼	Proposed
		Underway			Underway
		Complete			Complete
	Accompl. Type: ▼	Proposed		Accompl. Type: ▼	Proposed
		Underway			Underway
		Complete			Complete
	Accompl. Type: ▼	Proposed		Accompl. Type: ▼	Proposed
		Underway			Underway
		Complete			Complete
Proposed Outcome		Performance Measure		Actual Outcome	
12 Construction of Housing 570.201(m) ▼		Matrix Codes ▼		Matrix Codes ▼	
Matrix Codes ▼		Matrix Codes ▼		Matrix Codes ▼	
Matrix Codes ▼		Matrix Codes ▼		Matrix Codes ▼	
Program Year 1	HOME ▼	Proposed Amt.	256523	Fund Source: ▼	Proposed Amt.
		Actual Amount			Actual Amount
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.
		Actual Amount			Actual Amount
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units
		Actual Units			Actual Units
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units
		Actual Units			Actual Units

Program Year 2	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 3	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 4	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 5	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	

Project Name: Homebuyer Assistance Program					
Description:	IDIS Project #: 26 UOG Code: IL179163 ST CLAIR COUNTY Downpayment and closing cost assistance for low-moderate income households for purchase of affordable homes.				
Location: Areawide	Priority Need Category Select one: Owner Occupied Housing				
Expected Completion Date: 9/30/2011	Explanation:				
Objective Category <input checked="" type="radio"/> Decent Housing <input type="radio"/> Suitable Living Environment <input type="radio"/> Economic Opportunity	Specific Objectives				
Outcome Categories <input type="checkbox"/> Availability/Accessibility <input checked="" type="checkbox"/> Affordability <input type="checkbox"/> Sustainability	1. Increase the availability of affordable owner housing				
	2.				
	3.				
Project-level Accomplishments	04 Households	Proposed	20	Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
	Accompl. Type:	Proposed		Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
	Accompl. Type:	Proposed		Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
Proposed Outcome		Performance Measure		Actual Outcome	
13 Direct Homeownership Assistance 570.201(n)		Matrix Codes		Matrix Codes	
Matrix Codes		Matrix Codes		Matrix Codes	
Matrix Codes		Matrix Codes		Matrix Codes	
Program Year 1	HOME	Proposed Amt.	137000	Fund Source:	Proposed Amt.
		Actual Amount			Actual Amount
	Fund Source:	Proposed Amt.		Fund Source:	Proposed Amt.
		Actual Amount			Actual Amount
	Accompl. Type:	Proposed Units		Accompl. Type:	Proposed Units
		Actual Units			Actual Units
	Accompl. Type:	Proposed Units		Accompl. Type:	Proposed Units
		Actual Units			Actual Units

Program Year 2	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 3	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 4	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 5	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	

Project Name: Economic Development Revolving Loan Program					
Description:	IDIS Project #: 27 UOG Code: IL179163 ST CLAIR COUNTY Loans to businesses for job creation and retention activities.				
Location: Areawide	Priority Need Category Select one: Economic Development				
Expected Completion Date: (mm/dd/yyyy)	Explanation:				
Objective Category <input type="radio"/> Decent Housing <input type="radio"/> Suitable Living Environment <input checked="" type="radio"/> Economic Opportunity	Specific Objectives				
Outcome Categories <input checked="" type="checkbox"/> Availability/Accessibility <input type="checkbox"/> Affordability <input type="checkbox"/> Sustainability	1. Improve economic opportunities for low-income persons				
	2.				
	3.				
Project-level Accomplishments	13 Jobs	Proposed	10	Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
	Accompl. Type:	Proposed		Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
	Accompl. Type:	Proposed		Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
Proposed Outcome	Performance Measure	Actual Outcome			
18A ED Direct Financial Assistance to For-Profits 570.203(b)		Matrix Codes			
Matrix Codes		Matrix Codes			
Matrix Codes		Matrix Codes			
Program Year 1	CDBG	Proposed Amt.	164869	Fund Source:	Proposed Amt.
		Actual Amount			Actual Amount
	Fund Source:	Proposed Amt.		Fund Source:	Proposed Amt.
		Actual Amount			Actual Amount
	13 Jobs	Proposed Units		Accompl. Type:	Proposed Units
		Actual Units			Actual Units
	Accompl. Type:	Proposed Units		Accompl. Type:	Proposed Units
		Actual Units			Actual Units

Program Year 2	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 3	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 4	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 5	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	

Project Name: IGD Administration		
Description:	IDIS Project #: 28 UOG Code: IL179163 ST CLAIR COUNTY Planning and Administration of the CDBG and HOME Programs	
Location: St. Clair County Intergovernmental Grants Department-19 Public Square, Suite 200, Belleville, IL 62220-1624	Priority Need Category Select one: Planning/Administration ▼ Explanation:	
Expected Completion Date: 9/30/2011	Specific Objectives 1, Improve economic opportunities for low-income persons ▼ 2, ▼ 3, ▼	
Objective Category <input type="radio"/> Decent Housing <input checked="" type="radio"/> Suitable Living Environment <input type="radio"/> Economic Opportunity		
Outcome Categories <input checked="" type="checkbox"/> Availability/Accessibility <input checked="" type="checkbox"/> Affordability <input checked="" type="checkbox"/> Sustainability		
Project-level Accomplishments	Accompl. Type: ▼ Proposed Underway Complete	Accompl. Type: ▼ Proposed Underway Complete
	Accompl. Type: ▼ Proposed Underway Complete	Accompl. Type: ▼ Proposed Underway Complete
	Accompl. Type: ▼ Proposed Underway Complete	Accompl. Type: ▼ Proposed Underway Complete
	Proposed Outcome	
	Performance Measure	
	Actual Outcome	
	21A General Program Administration 570.206 ▼ Matrix Codes ▼	
	21H HOME Admin/Planning Costs of PJ (subject to 5% cap ▼ Matrix Codes ▼	
	Matrix Codes ▼ Matrix Codes ▼	
Program Year 1	CDBG ▼ Proposed Amt. 570650 Actual Amount	Fund Source: ▼ Proposed Amt. Actual Amount
	HOME ▼ Proposed Amt. 104348 Actual Amount	Fund Source: ▼ Proposed Amt. Actual Amount
	Other ▼ Proposed Units Actual Units	Accompl. Type: ▼ Proposed Units Actual Units
	Other ▼ Proposed Units Actual Units	Accompl. Type: ▼ Proposed Units Actual Units

Program Year 2	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 3	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 4	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 5	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	

Project Name: Housing Counseling and Assistance Center						
Description:	IDIS Project #: 29 UOG Code: IL179163 ST CLAIR COUNTY					
Operates Continuum of Care Programs for the homeless and near homeless and provides fair housing and other housing counseling and education services.						
Location:	Priority Need Category					
St. Clair County Housing Counseling and Assistance Center- 10 Public Square, Belleville, IL 62220-1623	Select one: Public Services ▼					
Explanation:						
Expected Completion Date:						
9/30/2011						
Objective Category <input type="radio"/> Decent Housing <input checked="" type="radio"/> Suitable Living Environment <input type="radio"/> Economic Opportunity						
Specific Objectives						
Outcome Categories <input checked="" type="checkbox"/> Availability/Accessibility <input type="checkbox"/> Affordability <input type="checkbox"/> Sustainability	1, Improve the services for low/mod income persons ▼					
	2, ▼					
	3, ▼					
Project-level Accomplishments	01 People ▼	Proposed	50	Accompl. Type: ▼	Proposed	
		Underway			Underway	
		Complete			Complete	
	Accompl. Type: ▼	Proposed		Accompl. Type: ▼	Proposed	
		Underway			Underway	
		Complete			Complete	
	Accompl. Type: ▼	Proposed		Accompl. Type: ▼	Proposed	
		Underway			Underway	
		Complete			Complete	
Proposed Outcome		Performance Measure		Actual Outcome		
05 Public Services (General) 570.201(e) ▼		Matrix Codes ▼				
05J Fair Housing Activities (if CDBG, then subject to 570.201(e) ▼		Matrix Codes ▼				
Matrix Codes ▼		Matrix Codes ▼				
Program Year 1	CDBG ▼	Proposed Amt.	20000	Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	09 Organizations ▼	Proposed Units	1	Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	

Program Year 2	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 3	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 4	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 5	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	

Project Name: Building Demolition					
Description:	IDIS Project #: 30 UOG Code: IL179163 ST CLAIR COUNTY Demolition of vacant deteriorated structures.				
Location: Areawide	Priority Need Category Select one: Other				
Expected Completion Date: 9/30/2011	Explanation:				
Objective Category <input type="radio"/> Decent Housing <input checked="" type="radio"/> Suitable Living Environment <input type="radio"/> Economic Opportunity	Specific Objectives				
Outcome Categories <input checked="" type="checkbox"/> Availability/Accessibility <input type="checkbox"/> Affordability <input type="checkbox"/> Sustainability	1. Improve the services for low/mod income persons				
	2.				
	3.				
Project-level Accomplishments	10 Housing Units	Proposed	4	Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
	Accompl. Type:	Proposed		Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
	Accompl. Type:	Proposed		Accompl. Type:	Proposed
		Underway			Underway
		Complete			Complete
Proposed Outcome		Performance Measure		Actual Outcome	
04 Clearance and Demolition 570.201(d)		Matrix Codes		Matrix Codes	
Matrix Codes		Matrix Codes		Matrix Codes	
Matrix Codes		Matrix Codes		Matrix Codes	
Program Year 1	CDBG	Proposed Amt.	40000	Fund Source:	Proposed Amt.
		Actual Amount			Actual Amount
	Fund Source:	Proposed Amt.		Fund Source:	Proposed Amt.
		Actual Amount			Actual Amount
	Other	Proposed Units		Accompl. Type:	Proposed Units
		Actual Units			Actual Units
	Accompl. Type:	Proposed Units		Accompl. Type:	Proposed Units
		Actual Units			Actual Units

Program Year 2	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 3	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 4	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
Program Year 5	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	

NON-STATE GRANTEE
CERTIFICATIONS



CPMP Non-State Grantee Certifications

Many elements of this document may be completed electronically, however a signature must be manually applied and the document must be submitted in paper form to the Field Office.

- This certification does not apply.
 This certification is applicable.

NON-STATE GOVERNMENT CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing -- The jurisdiction will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential antidisplacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

Drug Free Workplace -- It will or will continue to provide a drug-free workplace by:

1. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
2. Establishing an ongoing drug-free awareness program to inform employees about –
 - a. The dangers of drug abuse in the workplace;
 - b. The grantee's policy of maintaining a drug-free workplace;
 - c. Any available drug counseling, rehabilitation, and employee assistance programs; and
 - d. The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
3. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph 1;
4. Notifying the employee in the statement required by paragraph 1 that, as a condition of employment under the grant, the employee will –
 - a. Abide by the terms of the statement; and
 - b. Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
5. Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph 4(b) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;
6. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph 4(b), with respect to any employee who is so convicted –
 - a. Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
 - b. Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;
7. Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs 1, 2, 3, 4, 5 and 6.

Jurisdiction

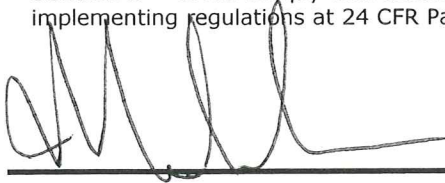
Anti-Lobbying -- To the best of the jurisdiction's knowledge and belief:

8. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
9. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
10. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction -- The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan -- The housing activities to be undertaken with CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.



08/12/10

Signature/Authorized Official

Date

Mark A. Kern

Name

Chairman, St. Clair County Board

Title

#10 Public Square

Address

Belleville, IL 62220

City/State/Zip

618-277-6790

Telephone Number

- | |
|--|
| <input type="checkbox"/> This certification does not apply. |
| <input checked="" type="checkbox"/> This certification is applicable. |

Specific CDBG Certifications

The Entitlement Community certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

Community Development Plan -- Its consolidated housing and community development plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that provide decent housing, expand economic opportunities primarily for persons of low and moderate income. (See CFR 24 570.2 and CFR 24 part 570)

Following a Plan -- It is following a current consolidated plan (or Comprehensive Housing Affordability Strategy) that has been approved by HUD.

Use of Funds -- It has complied with the following criteria:

11. Maximum Feasible Priority - With respect to activities expected to be assisted with CDBG funds, it certifies that it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low and moderate income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available);
12. Overall Benefit - The aggregate use of CDBG funds including section 108 guaranteed loans during program year(s) 2010, 2011, 2012, (a period specified by the grantee consisting of one, two, or three specific consecutive program years), shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period;
13. Special Assessments - It will not attempt to recover any capital costs of public improvements assisted with CDBG funds including Section 108 loan guaranteed funds by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108, unless CDBG funds are used to pay the proportion of fee or assessment attributable to the capital costs of public improvements financed from other revenue sources. In this case, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. Also, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force -- It has adopted and is enforcing:

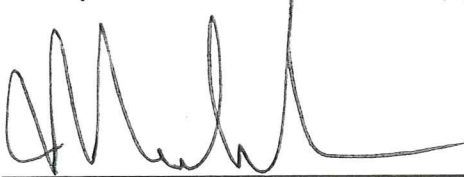
14. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
15. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction;

Jurisdiction

Compliance With Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 USC 2000d), the Fair Housing Act (42 USC 3601-3619), and implementing regulations.

Lead-Based Paint -- Its activities concerning lead-based paint will comply with the requirements of part 35, subparts A, B, J, K and R, of title 24;

Compliance with Laws -- It will comply with applicable laws.



08/12/10

Signature/Authorized Official

Date

Mark A. Kern

Name

Chairman, St. Clair County Board

Title

#10 Public Square

Address

Belleville, IL 62220

City/State/Zip

618-277-6600

Telephone Number

- This certification does not apply.**
 This certification is applicable.

**OPTIONAL CERTIFICATION
CDBG**

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having a particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities, which are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.

08/12/10

Signature/Authorized Official

Date

Mark A. Kern

Name

Chairman, St. Clair County Board

Title

#10 Public Square

Address

Belleville, IL 62220

City/State/Zip

618-277-6600

Telephone Number

- This certification does not apply.
 This certification is applicable.

Specific HOME Certifications

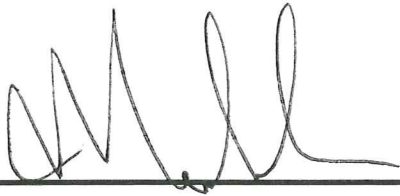
The HOME participating jurisdiction certifies that:

Tenant Based Rental Assistance -- If the participating jurisdiction intends to provide tenant-based rental assistance:

The use of HOME funds for tenant-based rental assistance is an essential element of the participating jurisdiction's consolidated plan for expanding the supply, affordability, and availability of decent, safe, sanitary, and affordable housing.

Eligible Activities and Costs -- it is using and will use HOME funds for eligible activities and costs, as described in 24 CFR § 92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in § 92.214.

Appropriate Financial Assistance -- before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;



08/12/10

Signature/Authorized Official

Date

Mark A. Kern

Name

Chairman, St. Clair County Board

Title

#10 Public Square

Address

Belleville, IL 62220

City/State/Zip

618-277-6600

Telephone Number

- This certification does not apply.
 This certification is applicable.

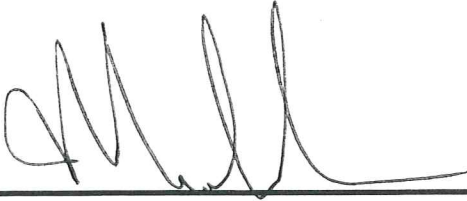
HOPWA Certifications

The HOPWA grantee certifies that:

Activities -- Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

Building -- Any building or structure assisted under that program shall be operated for the purpose specified in the plan:

1. For at least 10 years in the case of assistance involving new construction, substantial rehabilitation, or acquisition of a facility,
2. For at least 3 years in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.



Signature/Authorized Official

08/12/10

Date

Mark A. Kern

Name

Chairman, St. Clair County Board

Title

#10 Public Square

Address

Belleville, IL 62220

City/State/Zip

618-277-6600

Telephone Number

- | |
|--|
| <input checked="" type="checkbox"/> This certification does not apply.
<input type="checkbox"/> This certification is applicable. |
|--|

ESG Certifications

I, _____, Chief Executive Officer of Jurisdiction, certify that the local government will ensure the provision of the matching supplemental funds required by the regulation at 24 *CFR* 576.51. I have attached to this certification a description of the sources and amounts of such supplemental funds.

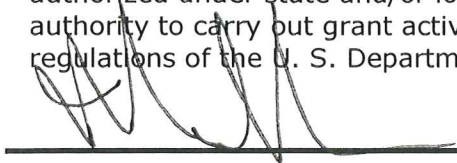
I further certify that the local government will comply with:

1. The requirements of 24 *CFR* 576.53 concerning the continued use of buildings for which Emergency Shelter Grants are used for rehabilitation or conversion of buildings for use as emergency shelters for the homeless; or when funds are used solely for operating costs or essential services.
2. The building standards requirement of 24 *CFR* 576.55.
3. The requirements of 24 *CFR* 576.56, concerning assurances on services and other assistance to the homeless.
4. The requirements of 24 *CFR* 576.57, other appropriate provisions of 24 *CFR* Part 576, and other applicable federal laws concerning nondiscrimination and equal opportunity.
5. The requirements of 24 *CFR* 576.59(b) concerning the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970.
6. The requirement of 24 *CFR* 576.59 concerning minimizing the displacement of persons as a result of a project assisted with these funds.
7. The requirements of 24 *CFR* Part 24 concerning the Drug Free Workplace Act of 1988.
8. The requirements of 24 *CFR* 576.56(a) and 576.65(b) that grantees develop and implement procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted with ESG funds and that the address or location of any family violence shelter project will not be made public, except with written authorization of the person or persons responsible for the operation of such shelter.
9. The requirement that recipients involve themselves, to the maximum extent practicable and where appropriate, homeless individuals and families in policymaking, renovating, maintaining, and operating facilities assisted under the ESG program, and in providing services for occupants of these facilities as provided by 24 *CFR* 76.56.
10. The requirements of 24 *CFR* 576.57(e) dealing with the provisions of, and regulations and procedures applicable with respect to the environmental review responsibilities under the National Environmental Policy Act of 1969 and related

authorities as specified in 24 *CFR* Part 58.

11. The requirements of 24 *CFR* 576.21(a)(4) providing that the funding of homeless prevention activities for families that have received eviction notices or notices of termination of utility services will meet the requirements that: (A) the inability of the family to make the required payments must be the result of a sudden reduction in income; (B) the assistance must be necessary to avoid eviction of the family or termination of the services to the family; (C) there must be a reasonable prospect that the family will be able to resume payments within a reasonable period of time; and (D) the assistance must not supplant funding for preexisting homeless prevention activities from any other source.
12. The new requirement of the McKinney-Vento Act (42 *USC* 11362) to develop and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent such discharge from immediately resulting in homelessness for such persons. I further understand that state and local governments are primarily responsible for the care of these individuals, and that ESG funds are not to be used to assist such persons in place of state and local resources.
13. HUD's standards for participation in a local Homeless Management Information System (HMIS) and the collection and reporting of client-level information.

I further certify that the submission of a completed and approved Consolidated Plan with its certifications, which act as the application for an Emergency Shelter Grant, is authorized under state and/or local law, and that the local government possesses legal authority to carry out grant activities in accordance with the applicable laws and regulations of the U. S. Department of Housing and Urban Development.



08/12/10

Signature/Authorized Official

Date

Mark A. Kern

Name

Chairman, St. Clair County Board

Title

10 Public Square

Address

Belleville, IL 62220

City/State/Zip

618-277-6600

Telephone Number

<input type="checkbox"/> This certification does not apply. <input checked="" type="checkbox"/> This certification is applicable.
--

APPENDIX TO CERTIFICATIONS

Instructions Concerning Lobbying and Drug-Free Workplace Requirements

Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Drug-Free Workplace Certification

1. By signing and/or submitting this application or grant agreement, the grantee is providing the certification.
2. The certification is a material representation of fact upon which reliance is placed when the agency awards the grant. If it is later determined that the grantee knowingly rendered a false certification, or otherwise violates the requirements of the Drug-Free Workplace Act, HUD, in addition to any other remedies available to the Federal Government, may take action authorized under the Drug-Free Workplace Act.
3. Workplaces under grants, for grantees other than individuals, need not be identified on the certification. If known, they may be identified in the grant application. If the grantee does not identify the workplaces at the time of application, or upon award, if there is no application, the grantee must keep the identity of the workplace(s) on file in its office and make the information available for Federal inspection. Failure to identify all known workplaces constitutes a violation of the grantee's drug-free workplace requirements.
4. Workplace identifications must include the actual address of buildings (or parts of buildings) or other sites where work under the grant takes place. Categorical descriptions may be used (e.g., all vehicles of a mass transit authority or State highway department while in operation, State employees in each local unemployment office, performers in concert halls or radio stations).
5. If the workplace identified to the agency changes during the performance of the grant, the grantee shall inform the agency of the change(s), if it previously identified the workplaces in question (see paragraph three).
6. The grantee may insert in the space provided below the site(s) for the performance of work done in connection with the specific grant: Place of Performance (Street address, city, county, state, zip code) Check if there are workplaces on file that are not identified here. The certification with regard to the drug-free workplace is required by 24 CFR part 21.

Place Name	Street	City	County	State	Zip
St. Clair County IGD	#19 Public Square, Suite 200	Belleville	St. Clair	IL	62220

7. Definitions of terms in the Nonprocurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification. Grantees' attention is called, in particular, to the following definitions from these rules: "Controlled substance" means a controlled substance in Schedules I through V of the Controlled Substances Act (21 U.S.C. 812) and as further defined by regulation (21 CFR 1308.11 through 1308.15); "Conviction" means a finding of guilt (including a plea of *nolo contendere*) or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of the Federal or State criminal drug statutes; "Criminal drug statute" means a Federal or non-Federal

Jurisdiction

criminal statute involving the manufacture, distribution, dispensing, use, or possession of any controlled substance; "Employee" means the employee of a grantee directly engaged in the performance of work under a grant, including:

- a. All "direct charge" employees;
- b. all "indirect charge" employees unless their impact or involvement is insignificant to the performance of the grant; and
- c. temporary personnel and consultants who are directly engaged in the performance of work under the grant and who are on the grantee's payroll. This definition does not include workers not on the payroll of the grantee (e.g., volunteers, even if used to meet a matching requirement; consultants or independent contractors not on the grantee's payroll; or employees of subrecipients or subcontractors in covered workplaces).

Note that by signing these certifications, certain documents must be completed, in use, and on file for verification. These documents include:

1. Analysis of Impediments to Fair Housing
2. Citizen Participation Plan
3. Anti-displacement and Relocation Plan



Signature/Authorized Official

08/12/10

Date

Mark A. Kern

Name

Chairman, St. Clair County Board

Title

#10 Public Square

Address

Belleville, IL 62220

City/State/Zip

618-277-6600

Telephone Number

APPENDIX

APPENDIX

Citizen Participation

Public Notice:

NOTICE OF PUBLIC MEETINGS ON PY2010 ANNUAL ACTION PLAN COMMUNITY NEEDS

St. Clair County Intergovernmental Grants Department, Community Development Division is in the process of preparing its **Annual Action Plan** for Program Year 2010. This plan is for the Community Development Block Grant (CDBG), HOME Investment Partnership programs. **We want to hear from you!**

We would like to know what needs you and your community have. In Program Year 2010 (October 1st, 2010 through September 30th, 2011), we expect to receive \$2,130,425.00 for the CDBG program, \$939,636.00 for the HOME program.

The geographic area we serve includes all of St. Clair County, except the City of East St. Louis, Scott Air Force Base, and the City of Collinsville.

Government laws and regulations require the County to spend these funds with the objectives of: benefiting low-moderate income persons; aiding in the prevention or elimination of slums and blight; or meeting other community development needs posing serious and immediate threats to the health and welfare of the community. The goals of the programs are to provide decent housing, establish and maintain stable living environments, and expand economic opportunities. The County is in the process of determining the needs to be addressed in the **Annual Action Plan**. Examples of needs which have been addressed in our previous Annual Action Plans are: improving public infrastructure; conserving and expanding the County's housing stock; and strengthening economic development.

We are interested in your comments on our past performance. We would also appreciate your input as we determine the needs of low and low-moderate income persons, set annual goals, and plan how to best meet these goals with the funds available. Help us to serve you and your community better.

Please come to our PUBLIC MEETINGS at the following times and places:

Tuesday, March 9, 2010
6:30 P.M.
Centreville City Hall
5800 Bond Avenue, Centreville, IL.

Wednesday, March 10, 2010
6:30 P.M.
New Athens Community Center
406 Chester Street, New Athens, IL.

**Monday, March 15, 2010
6:30 P.M.
Lebanon City Hall
312 W. St. Louis Street, Lebanon, IL.**

All are welcome. If you cannot make it to these meetings, please submit your comments to us at:

St. Clair County Intergovernmental Grants Department, Community Development Division, #19 Public Square, Suite 200, Belleville, IL 62220. Phone calls and written comments should be directed to Vince Kwiatkowski, 277-6790 ext. 3211.

The County will seek additional public input as the planning process continues.

**MARK A. KERN
CHAIRMAN, ST. CLAIR COUNTY
BOARD**

Public Hearings:

March 9, 2010 Public Hearing: Consolidated Plan Needs Determination

Thirty-six persons attended this Needs Determination Public Hearing for the PY 2010-2014 Consolidated Plan/PY 2010 Annual Action Plan. A sign-in sheet is available upon request.

The hearing was held at the City Hall in Centreville, an ADA accessible facility. The County received no requests for any special accommodations.

The County staff asked for public input regarding the needs of the area. They used printed hand-outs and a PowerPoint presentation to describe past years funding, programs conducted in the community and the results, how that compared to the other 46 communities in the County's program, and contact names/phone numbers/e-mail addresses/County website information.

Staff also asked for comments on County performance for the current program year to use in the PY 2009 CAPER.

The Hearing lasted for nearly two hours. Staff stayed for about 30 minutes after the Hearing to answer additional questions.

Staff also asked for comments on County performance for the current program year to use in the PY 2009 Consolidated Annual Performance Evaluation Report (CAPER).

Meeting Summary Notes/Comments

- Allow HOME funds for double-wide trailers on a permanent foundation
 - Taxes would decrease from approximately \$6,000 on a newly built home, to approximately \$3,500 for a double-wide trailer

- People are losing their homes due to inability to pay real estate taxes; yet they can afford a mortgage
 - Not related to our program: "County needs a tax reform"
 - City is selling unused land/property to residents for a nominal fee to allow residents to bring in mobile homes and place on a permanent foundation
- Allow CDBG home rehabilitation funds to be spent first on low-income households in low-income communities, before expending funds on households in communities not recognized as low-moderate income
 - Comment: "The need for rehab of a home should be inspected/evaluated so the worst cases are assisted first, rather than depending upon a lottery system"
- Find a better way to let local citizens know when the home rehabilitation program opens as many citizens cannot afford to purchase the local newspaper
 - Advertise on local TV Channel
 - Notify all local churches as they do weekly announcements and more people are involved in church than they are in activities through the local City Hall
 - Advertise in the American Journal, a free paper in the minority community that goes to the churches
- Questions pertaining to NSP
 - When are funds available?
 - Does NSP include demolition?
 - Homes need demolished but without a new one being built in its place, as taxes on new homes are greater than low-income persons can afford
- Stimulus Funds
 - Can the County request more stimulus funds?
 - HUD formula was explained to resident
- LINC program generated a lot of interest
 - How to apply?
 - What does it include?
 - Is program currently open?
- Weatherization program generated a lot of interest
 - How to apply?
 - What does it include?
 - Is program currently open?
 - What is cost for work to be completed?

- How are contractors selected to perform the work?
 - How does IGD know if the contractor has performed the work per plans/specs?
 - Voicemail is needed so messages may be left for a return call
- Resident referenced problem w/water back up in their yard
 - IGD referred resident to make their city administration aware of the problem so it might be addressed in their next public facilities application
 - Another resident referred them to monthly meetings at Common fields of Cahokia who maintain the water/sewer district portion of Centreville
- Resident noted that Public Facility work was poorly done on Tudor Ave. and Tulane Ave.
 - Explanation provided that this is a PY 2009 project that has not yet been performed; engineer is preparing plans/specs; project has yet to go out for bid
 - Resident questioned how work is monitored
 - Explanation provided how engineer and IGD representative monitor work
 - Explanation provided as to community's approval of work needed before payment to contractor is released
- Resident asked if all funds are expended in each of the programs, and if not, are excess funds rolled over to other programs
 - Explanation provided that all funds are fully expended
- Residents were encouraged to not be solely dependent upon IGD representatives memorizing all comments made at the meeting and were asked to submit comments in writing
 - Brochures/Handouts with phone numbers, addresses, provided at meeting
 - Residents notified that a "draft" of plan would be available mid-July 2010 and the final Consolidated Plan/Annual Action Plan must be submitted to the U.S. Department of Housing and Urban Development (HUD) by August 15, 2010.
- Alderman Williams asked if staff could assist Ms. Audry Lacey with Housing Rehabilitation. He said she applied for some assistance but had no response. Staff promised a response the next morning. The next morning, staff found that IGD sent an application to Ms. Lacey 3 months ago (early December, 2009), but received no response from Ms. Lacey. The Program Manager of the IGD Community Development Division called Alderman Williams that morning with this information. He was also given a phone number and contact person at Living Independently Now Center (LINC) and was told that Ms. Lacey could either find and fill out the application or contact LINC for help. Alderman Williams was very thankful.

March 10, 2010 Public Hearing: Consolidated Plan Needs Determination

Nineteen persons attended this Needs Determination Public Hearing for the PY 2010-2014 Consolidated Plan/PY 2010 Annual Action Plan. A sign-in sheet is available upon request.

The hearing was held at the Community Center in New Athens, an ADA accessible facility. The meeting was hosted by New Athens Township and the Village of New Athens. The County received no requests for any special accommodations.

The County staff asked for public input regarding the needs of the area. They used printed hand-outs and a PowerPoint presentation to describe past years funding, programs conducted in the community and the results, how that compared to the other 46 communities in the County's program, and contact names/phone numbers/e-mail addresses/County website information.

Staff also asked for comments on County performance for the current program year to use in the PY 2009 CAPER.

The Hearing lasted for 90 minutes. Staff stayed for about 30 minutes after the Hearing to answer additional questions.

Staff also asked for comments on County performance for the current program year to use in the PY 2009 Consolidate Annual Performance Evaluation Report (CAPER).

Meeting Summary Notes/Comments

- How is an entitlement area determined?
 - Explanation provided
- If a Fire District extends into another county, may it apply for public facility funds?
 - Explanation provided as to how entire fire district must meet LMA requirements
 - Funds other than CDBG funds through St. Clair County IGD would be necessary for any portion of work not located in St. Clair County
- How is the low-moderate area of a project determined?
 - Explanation provided explaining how the census data is calculated to determine an area has a low-moderate income population that is 51% or greater
 - Information about mail surveys, low-moderate clientele, and low-moderate job benefit was also briefly explained
- Are grants for homes decided by the individual or by the community where they live?
 - Provided explanation that public facilities are the only grant determined by community
 - Homebuyer, rehab, weather, etc. determined by individual

- Does Weatherization allow the grant to be forgivable after 5 years, like rehab?
 - Explanation provided that they are the same
- What happens if owner of home dies in less than the 5 year period where a grant was provided for weatherization or rehab?
 - Explanation provided as to how the balance would be prorated
- Staff met with attendees afterward answering questions, comments, etc.
 - How do they find out census information for their proposed public facility project?
 - How long can a community use their current HUD approved mail survey with the Census 2010 about to start?
 - Do any of our programs provide assistance to persons with a disability if their income is above the amount specified in the income guidelines
 - St. Libory commented they were going to start putting IGD information in their local paper; in the past they have simply posted information at a few locations around town
 - Provided additional explanation as to what is an eligible public facility project
 - Explained there are other funding resources that may be sought and even used in combination with CDBG funds

March 15, 2010 Public Hearing: Consolidated Plan Needs Determination

Twenty-two persons attended this Needs Determination Public Hearing for the PY 2010-2014 Consolidated Plan/PY 2010 Annual Action Plan. A sign-in sheet is available upon request.

The hearing was held at the City Hall in Lebanon, an ADA accessible facility. The County received no requests for any special accommodations.

The meeting was originally scheduled to begin at 6:30 p.m., just prior to a meeting of the Lebanon Aldermanic Board. The County and City intended to increase attendance for both meetings by holding them consecutively. The start time was delayed by approximately 40 minutes (starting at approximately 7:10 p.m.) because of special meeting between City Leaders and the Police Union and members. This also increased attendance.

The County staff asked for public input regarding the housing-related needs of the area. They used printed hand-outs and a PowerPoint presentation to describe past years funding, programs conducted in the community and the results, how that compared to the other 46 communities in the County's program, which programs are accepting applications and which are closed, and contact names/phone numbers/e-mail addresses/County website information.

Staff also asked for comments on County performance in the administration of each program described for the current program year to use in the PY 2009 Consolidate Annual Performance Evaluation Report (CAPER).

The Hearing lasted for 45 minutes, delaying the start of the City Board of Alderman meeting. Staff then stayed for about 30 minutes after the Hearing to answer additional questions, leaving at about 8:30.

Meeting Summary Notes/Comments

County staff addressed the following questions:

- Are there income restrictions for the different programs offered?
 - Staff showed a slide of income guidelines and described which programs were covered by each amount.
 - Because of the large turnout, there were not enough printed copies of the PowerPoint presentation. The City of Lebanon City Administrator asked if a copy of the PowerPoint handout and large print income guidelines could be mailed to their office. A copy was e-mailed to Parke Smith, City Administrator.
- How does the County seek new-construction builders, and are County funds available for approved contractors who have homes already built?
 - The County said it used an annual RFP process to secure projects. Only that project would receive funds for that year. They said that because of current economic conditions, new construction funds may be used in another housing program, such as housing rehabilitation. The County also explained the process of becoming a contractor for housing rehabilitation.
- A citizen said that a friend was interested in the new single-family homes that the County built in Lebanon. However the friend reportedly received different prices for homes and different eligibility requirements each time he contacted the builder the County used. The County presenter met the citizen after the meeting to discuss the issue. The citizen said this was only 2nd hand information and did not want to pursue the issue.
- How the County prevent the builder/developer from discriminating as to who purchases the house?
 - The County stated that it must approve all buyers submitted by builder/developer. In some cases this is a not for profit entity called a Community Housing Development Organization (CHDO).
- What do the different levels of income mean?
 - Explanation provided to explain which income levels apply to which programs.
- Can ADA be requested for the Township portion of a building or for the Police Station?
 - Explanation provided to explain how CDBG funds may be use for ADA public facilities projects.
 - Participants were reminded that the PY 2010 Public Facilities application is due to IGD by 5:00 PM on Friday, March 26.

May 6, 2010 Public Hearing: Draft Consolidated Plan

The meeting was held at the St. Clair County Courthouse, 10 Public Square, Belleville, Illinois, in the County Board Assembly Room – 5th Floor at 9:30 a.m. on May 6, 2010.

Representing the Grants department were Vince Kwiatkowski, Chris Anderson, Patrice Costello, Ken Kimball, Diana Little, Donna Loeffler, and Rick Stubblefield, Employment & Training.

Three people attended the public hearing. A sign-in sheet is available upon request.

Judge Milton Wharton asked to address the group prior to the presentation. He started by saying he did not know exactly what the Grants Department programs are or how the programs worked however, the announcement of the meeting asked for input on community needs. He said as an African American and a member of Old St. Joseph's Catholic Church he has an opportunity to see firsthand some of the problems that are being experienced by African Americans in low income areas. Their group has a Soup Bus and they make rounds on the weekends to feed the children in the neighborhood. He explained these children do not have food. Many of these families may be receiving assistance with Medical and Housing but with a zero income and no food the next step often leads to crime. Crime itself can escalate and result in prison. People who have been imprisoned are changed and when they re-enter society they often bring the bad habits and attitude with them. These attitudes and bad habits influence the children in our communities. He stated that only 14% of the population of St. Clair County is African American. However, they are the highest percentage in our prison system so our systems are not working.

He said the second largest employer in the State is the Prison System and it has been suggested that we build more prisons. He wants to see fewer young people going to prison because we have come up with a way to educate and protect them. He wants to see a coordinated effort with the Education System, Agency addressing Hunger, the Community, Churches, Families, and the Prison System to come up with a plan to assist these young people. The test scores for African American students are still the lowest and the High Schools are failing. He said it is not acceptable for children to go hungry in this country and for us not to be shocked at the lack of education.

Leighann Jones works with the Health Department. She said she had dealt with the Grants Department and had some questions. She said they had referred a client to the Grants department and they were denied services unfairly. The client then went for assistance to LINC in Fairview. The LINC office contacted us and the services were supplied. The services were through Community Services but no details were given.

Ms. Jones wanted to know who to address complaints or concerns. Although her comments were addressed to Community Services which was not represented at the meeting she was given the following information. She was given Cassandra Williams' name and extension. She requested who she would talk to if she was unsatisfied with Ms. Williams' answers. She was advised she could write a letter to the Executive Director. Ms. Jones wanted to know where Nina Ghatan and Beverly

Evansco worked. She was advised that Nina is with CSBG and Beverly is with Homeless programs.

She then questioned if Beverly would be spending the balance of the Homelessness Prevention Rapid Re-Housing Program by October since the slide presentation showed they had spent \$22,820. Chris Anderson's addresses the question. The HPRP grant is a two year grant and we can spend the entire amount in one year however, at this time we will go into the second year on this grant. The second item the \$22,820 on the slide presentation reflects the amount of the Grant that was spent in the Belleville area not the amount spent in St. Clair County. All the slides in the presentation reflect the area where the presentation is being made in this case Belleville. There has been money spent from that grant within St. Clair County.

Ms. Jones wanted to know if we made computers available to clients for internet use. Although, her comments were addressed to Employment & Training Division not Community Development Rick Stubblefield responded to the question. He advised that computer access is one of the services at the One Stops in a combination of services to educate, retrain, and employment that leads to self-sufficiency. She also wanted to know about the Grant to AmeriCorps. Ken Kimball responded to her question – the AmeriCorps Grant for \$15,000 is used for Tutoring.

Ms Jones asked where the plan is available for review. Ken Kimball gave a short list and advised that a full listing is in the Executive Summary she received.

Brenda Sanders wanted information on the Home Rehab Program and Weatherization. The information she requested was given during the presentation. Chris Anderson advised that the current program was closed and she should call in September 2010 to find out the lottery date. A lottery is used because we normally have funding to Rehab approximately 40 homes but we can have as many as 300 requests for assistance.

Citizen Comments:

An unsigned, undated letter was received on August 5th, 2010. It expressed concerns about the contractor selection process for the Neighborhood Stabilization Program (NSP). NSP is a Housing and Economic Recovery Act (HERA) Stimulus Grant received in Program Year 2009.



CITIZEN PARTICIPATION PLAN

April 2010

Table of Contents

	Page
Introduction	1
Encouraging Citizen Participation	1
Citizen Comment on the Citizen Participation Plan and Amendments	2
Development of the Consolidated Plan	2
Anti-Displacement and Relocation Assistance Plan	3
Substantial Amendments	4
The Consolidated Annual Performance Evaluation Report (CAPER)	4
Public Hearings	5
Meetings	6
Availability to the Public	6
Access to Records	6
Technical Assistance	7
Complaints and Grievances	7
Amendments to the Consolidated Plan	7
Criteria for Substantial Amendments to the Consolidated Plan	7
Annual Action Plan Timeline	8
CAPER Timeline	9
Appendix A	10
St. Clair County Anti-Displacement, Real Property Acquisition and Relocation Assistance Plan	

Introduction

St. Clair County, as a “Federal Entitlement Community,” is the recipient of funds through the U.S. Department of Housing and Urban Development (“HUD”) under two Federal Entitlement programs—the Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) programs. These two Federal Entitlement programs are operated under one "Consolidated Plan" that is adopted by the County and submitted to HUD every five years. The County's next Consolidated Plan will cover the period running from October 1, 2010 through September 30, 2015. In addition, each year the County adopts and submits to HUD an Annual Action Plan (Annual Plan) that describes the activities that will be funded through these two Federal Entitlement programs in the coming Program

Year. St. Clair County's Program Year is October 1 through September 30.

The Consolidated Plan Rule (24 CFR Part 91) requires all Entitlement Communities to adopt a Citizen Participation Plan that sets forth the jurisdiction's policies and procedures for citizen participation. This Citizen Participation Plan must provide for and encourage citizens to participate in the development of the Five-Year Consolidated Plan, Annual Plans, any Substantial Amendments to Annual Plans, and the County's Consolidated Annual Performance Evaluation Report (CAPER). This Citizen Participation Plan is available to the public upon request.

Encouraging Citizen Participation

St. Clair County encourages its citizens to participate in the development of the Consolidated Plan, Annual Plans, any Substantial Amendments to Annual Plans and Consolidated Annual Performance Evaluation Reports. The County especially encourages participation by low-moderate income persons where the County has plans to use CDBG and HOME funds. In addition, St. Clair County takes whatever actions are appropriate to encourage the participation of all its citizens, including minorities and non-English speaking persons, as well as persons with disabilities.

The primary purposes of the programs covered by this Citizen Participation Plan are to improve communities by providing decent housing, a suitable living environment, and growing economic opportunities – all principally for the benefit of low- and moderate income people. Therefore, St. Clair County believes that low income people must be genuinely involved at all stages of the Consolidated Planning process, including:

- Identifying needs;
- Setting priorities among these needs, deciding how much money should be allocated to each high-priority need and suggesting the types of programs to meet high-priority needs; and
- Overseeing the way in which programs are carried out, including citizen review and comment on current year activities.

In consultation with the St. Clair County Housing Authority, the County also encourages the participation of residents of public and assisted housing developments in developing and implementing the Consolidated Plan. St. Clair County provides information to the Housing Authority about Consolidated Plan activities related to its developments and surrounding communities so the Housing Authority can make this information available at its annual public hearing required under the Comprehensive Grant program.

Citizen Comment on the Citizen Participation Plan and Amendments

St. Clair County provides citizens with a reasonable opportunity to comment on its Citizen Participation Plan and on Substantial Amendments to its Citizen Participation Plan. The County makes the Citizen Participation Plan public and available in a format that is accessible to persons with disabilities upon request.

Development of the Consolidated Plan

1. Identification of housing and community development **needs**.
2. Preparation of a draft use of funds for the upcoming year, and every five years, for a strategic plan for the next five years, called the **proposed Annual Action Plan** and the **proposed Five-Year Consolidated Plan**.
3. Formal approval by elected officials of a **final Annual Action Plan** and/or **Five-Year Consolidated Plan**.
4. On occasion during the year, it might be necessary to change the use of the money already budgeted in an Annual Action Plan, or to change the priorities established in the Five-Year Strategic Plan. In that case an **Amendment**, and sometimes a **Substantial Amendment**, will be proposed, considered and acted upon.
5. After a Program Year is complete, a **Consolidated Annual Performance Evaluation Report (CAPER)** must be submitted to HUD.

Before St. Clair County adopts a Consolidated Plan, it makes available to citizens, public agencies, and other interested parties, information that includes the amount of assistance the County expects to receive (including grant funds and program income) and the range of activities that are eligible for funding through these programs, including the estimated amount that will benefit persons of low- and moderate-income.

A summary describing the contents and purpose of the Consolidated Plan, and a list of the locations where copies of the proposed Consolidated Plan may be examined, is published at least 30 days in advance of its submission to HUD on the St. Clair County website (www.co.st-clair.il.us), in the Belleville News Democrat (the newspaper having the largest circulation in St. Clair County), and in one local minority newspaper to afford citizens, public agencies, and other interested parties a reasonable opportunity to examine its contents and to submit comments. Copies of the proposed Consolidated Plan are also made available at libraries, government offices, and other public places. In addition, the County provides a reasonable number of free copies of the Plan to citizens and groups that request it.

St. Clair County holds at least one public hearing each year to obtain residents' opinions about community development and housing needs and what priority should be given to those needs. In order to encourage public involvement, the County historically holds multiple hearings in various communities to determine the specific needs and priorities identified by low and moderate income people. The County holds these public hearings at least 30 days prior to publishing a Proposed Annual Plan or Five-Year Consolidated Plan for comment. This allows the County to consider needs identified by citizens when drafting the Annual Plan and Five-Year Consolidated Plan.

Between thirty and sixty days after the last housing and community development needs public hearing, the County provides notice of a public hearing to review and comment on the Proposed Annual Plan and/or Consolidated Plan. This public hearing is held at least thirty days prior to the County's submission of the Annual Plan or Consolidated Plan to HUD for final approval (by July 17) so that low- and moderate-income people have an opportunity to examine it and submit comments. The Annual Plan or Consolidated Plan is submitted to HUD no less than 45 days prior to the beginning of the Program Year (by August 17).

The County considers any comments or views of citizens received in writing, by e-mail, or orally at the public hearings, in preparing the final Consolidated Plan. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons therefore, are attached to the final Consolidated Plan.

Copies of the Annual Plan and Five-Year Consolidated Plan as submitted to HUD, and a summary of the submission are made available to the public for free. Free copies are available on the County website (www.co.st-clair.il.us), at the St. Clair County Intergovernmental Grants Department (IGD), the County Courthouse and various public libraries, senior/community centers, and village/city halls throughout the County.

Anti-Displacement, Real Property Acquisition and Relocation Assistance Plan

St. Clair County does not intend to fund any activities that will cause the displacement of any persons and it is the policy of the County to take all necessary and appropriate steps to minimize displacement of persons as a result of activities assisted through its Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), and other federally funded programs for which the County may be a recipient. The County takes the following steps to minimize displacement:

1. The County encourages developers participating in the County's development programs to build on vacant lots, rehabilitate vacant rather than occupied buildings, and/or rehabilitate occupied or partly occupied buildings in stages to minimize displacement.
2. The County encourages developers participating in the County's development programs to undertake housing developments with a mix of different levels of affordability, thereby ensuring an adequate supply of low and moderately priced housing units.

3. As funds are available, the County will continue to fund home repair programs that provide funds to eligible homeowners, including those required to correct building code-related deficiencies, thereby assisting residents to remain within their current homes and avoid to displacement due to inability to maintain their residences.

St. Clair County requires that all developments financed with CDBG and/or HOME funds comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (the “Uniform Act”), its implementing regulations at 49 CFR Part 24 (the Uniform Act Regulations), and the requirements of 24 CFR 570.606 (the CDBG Regulations) and/or 24 CFR 92.353 (the HOME Regulations). For more information regarding the County’s policy, please see Appendix A, *St. Clair County Anti-Displacement, Real Property Acquisition and Relocation Assistance Plan*.

Substantial Amendments

Whenever the County proposes to make a Substantial Amendment to the Consolidated Plan, it publishes a detailed description of the amendment as a “display advertisement” in the Belleville News Democrat in a non-legal section of the newspaper. Notices are also published, as funds and time allow, in neighborhood and community newspapers. Public notices of the proposed Amendment are also posted in city and village halls and public libraries throughout the County. In addition, notices are sent to any person or organization requesting to be put on the mailing list. Notices are sent to neighborhood organizations, public housing resident groups, and religious organizations in low-moderate income neighborhoods and to agencies providing services to lower income persons upon request. No Substantial Amendment will be submitted to HUD until the public has had at least 30 days to review and comment on it.

The County will consider any comments or views of citizens received by e-mail, in writing, or orally at public hearings, in preparing the proposed Substantial Amendment for submission to HUD. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons therefore, are attached to the Substantial Amendment submitted to HUD.

The Consolidated Annual Performance and Evaluation Report (CAPER)

Every year, within 90 days after the close of the Program Year (by December 29), St. Clair County must submit a performance and evaluation report (the “CAPER”) to HUD. This report describes how funds were actually used and the extent to which these funds were used for activities that benefited low- and moderate-income people.

The County holds public hearings on the CAPER concurrently with hearings on the Annual Plan and/or the Five-Year Consolidated Plan and another public hearing dedicated solely to review of the CAPER within 15 work-days before or after the end of the Program Year. This hearing is dedicated to securing public comment on programs and activities conducted during that Program Year.

A draft of the CAPER is made available to the public for review and comment on the County website (www.co.st-clair.il.us), at the IGD office and at various advertised locations at least 15 days prior to its submission to HUD (by December 14).

In preparing its annual performance report the County considers any comments or views of citizens received by e-mail, in writing, or orally at the public hearings, and a summary of these comments or views is attached to the performance report.

Public Hearings

St. Clair County holds public hearings at all stages of the Consolidated Plan process, including at least one hearing about community needs, hearings to review proposed available funding amounts (including grant and program income amounts) and proposed uses of funds, and hearings to allow the public to assess how funds were spent during the previous program year.

The County has historically held multiple hearings in order to secure public participation from its geographically and culturally diverse population and plans to continue this practice.

St. Clair County gives notice the public at least 15 days in advance of any public hearing or review and comment period provided for in this Citizen Participation Plan. Specific time periods for citizen notice and comment for certain actions are explained in other sections of this Plan that describe those actions. The content of these notices gives citizens sufficient information about the subject of the hearing to permit informed comment.

Hearings to secure public comment on current year performance as reported in the CAPER are combined with the Annual Plan/Consolidated Plan hearings. These hearings are held approximately half-way (March –April) and three-quarters of the way (June-July) through the Program Year. By conducting CAPER hearings with the Consolidated Plan hearings, citizens have the advantage of commenting on the performance of recent programs and activities while they are reviewing and commenting on planned activities.

Public hearings are held at various times of day to allow for the greatest convenience to potential or actual beneficiaries. Hearings are held in communities where CDBG and HOME-funded activities are being carried out or where there are plans to undertake CDBG or HOME-funded activities. All public hearings are held at locations that are accessible to people with disabilities and comply with the Americans with Disabilities Act (ADA). Specific accommodations will be made for people with disabilities when requests are made at least five working days prior to a public hearing. Translation for persons with hearing impairments will be provided when requests are made at least five working days prior to a public hearing.

In the case of public hearings where a significant number of non-English speaking residents can reasonably be expected to participate, the County will provide translation services for the expected language.

Meetings

Public Notices are published in the Belleville News Democrat. Public notices for public hearings on the identification of housing and community development needs and the development of proposed activities to be included in the Annual Plan, and for review and comment on the Five-Year Consolidated Plan and CAPER are done as “display advertisements” in a non-legal section of the newspaper. Notices are also published, as funds and time allow, in neighborhood and community newspapers.

Public Notices are also provided to communities throughout the County, with a request that copies should be placed in village halls and public libraries. In addition, notices are sent to any person or organization requesting to be put on the mailing list. Notices are sent to neighborhood organizations, public housing resident groups, and religious organizations in low-moderate income neighborhoods and to agencies providing services to lower income persons upon request.

All public meetings are held at times and places convenient to people that might benefit from the use of funds. The times and places of meetings to review the County’s needs assessment, the preliminary Annual Plan, preliminary Five-Year Consolidated Plan and CAPER may vary from year to year in order to attempt to provide information to, and an opportunity to be heard by, a demographically diverse population. Public meetings on the Annual Plan and Five-Year Consolidated Plan being submitted to HUD are also held at the St. Clair County Courthouse.

Availability to the Public

Copies of the Consolidated Plan as adopted, Substantial Amendments, and the CAPER (the annual performance report) are available to the public on the County website (www.co.st-clair.il.us) and at the offices of the St. Clair County Intergovernmental Grants Department (IGD) at cost within a reasonable time after a request is made. These materials are made available in a form that is accessible to persons with disabilities when requested by coordinating with agencies working with disabled people, such as LINC (Living Independently Now Center), to provide planning and reporting information in an appropriate format.

Access to Records

Citizens, public agencies and other interested parties are given reasonable and timely access to information and records relating to the Consolidated Plan and the actual use of funds covered by the Citizen Participation Plan at the offices of the St. Clair County IGD. Access to records for the past use of funds is limited to uses of funds during the past five years.

Technical Assistance

The staff of the St. Clair County IGD will work with municipalities, townships, organizations and individuals who represent low and moderate-income people who are interested in

submitting proposals to obtain funding for eligible activities. All potential funding applicants are encouraged to contact County staff for technical assistance before completing a proposal form.

Complaints and Grievances

Citizen complaints related to the Consolidated Plan, any amendments to the Plan, and the Consolidated Annual Performance Evaluation Report (CAPER) should direct comments by e-mail, in writing, or by phone to:

Debra H. Moore, Ph.D., Executive Director
St. Clair County Intergovernmental Grants Department
#19 Public Square, Suite 200
Belleville, IL 62220
(618) 277-6790 x3203
dmoore@co.st-clair.il.us

St. Clair County will provide timely written responses to all written complains and grievances within 15 working days of the receipt of the complaint, where practicable.

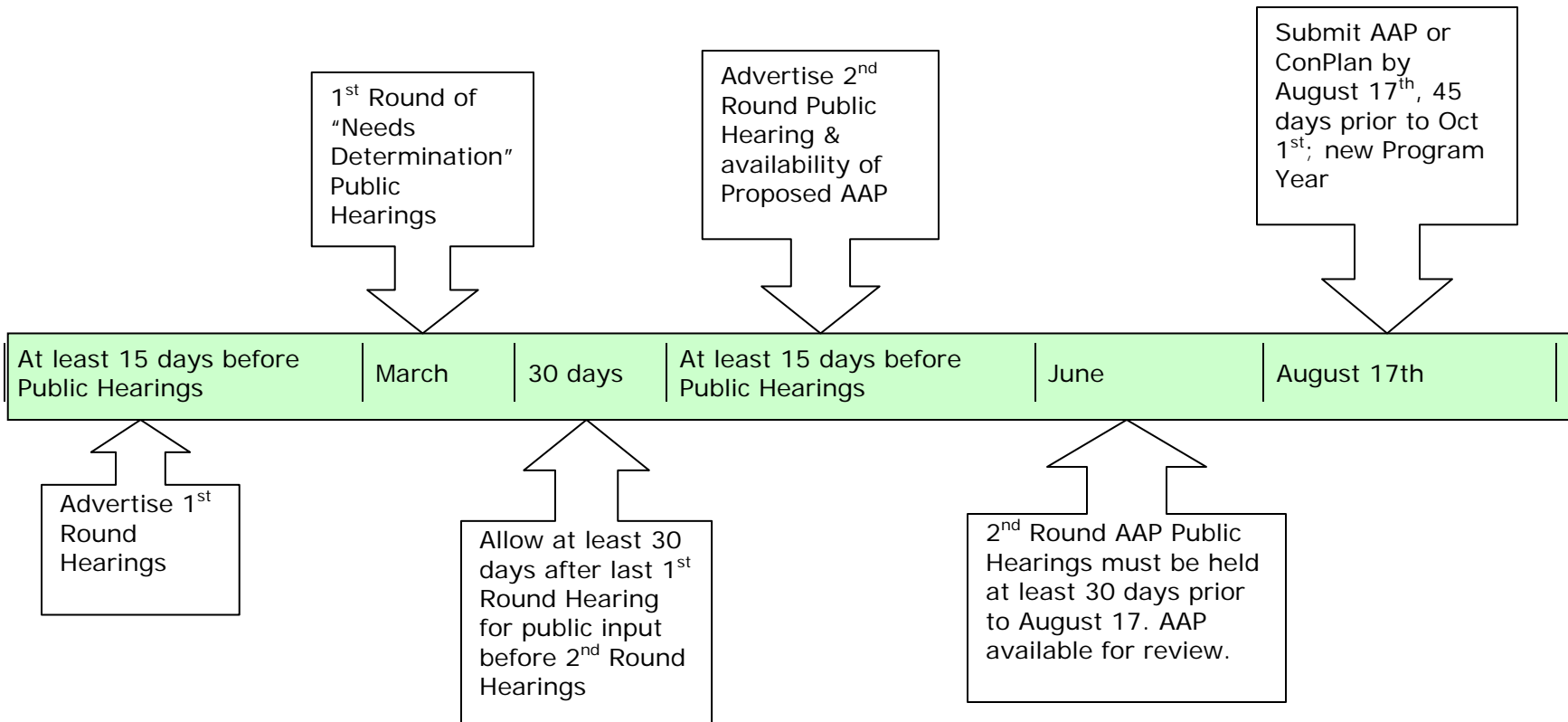
Amendments to the Consolidated Plan

St. Clair County will amend its Annual Plan any time there is (1) a change in one of the priorities listed in the Priority Tables of the Five-Year Consolidated Plan; (2) a substantial change in the use of funds to an activity not mentioned in the Annual Plan or Five-Year Consolidated Plan; or (3) a substantial change in the purpose, location, scope, or beneficiaries of an activity in the Annual Plan or Five-Year Consolidated Plan.

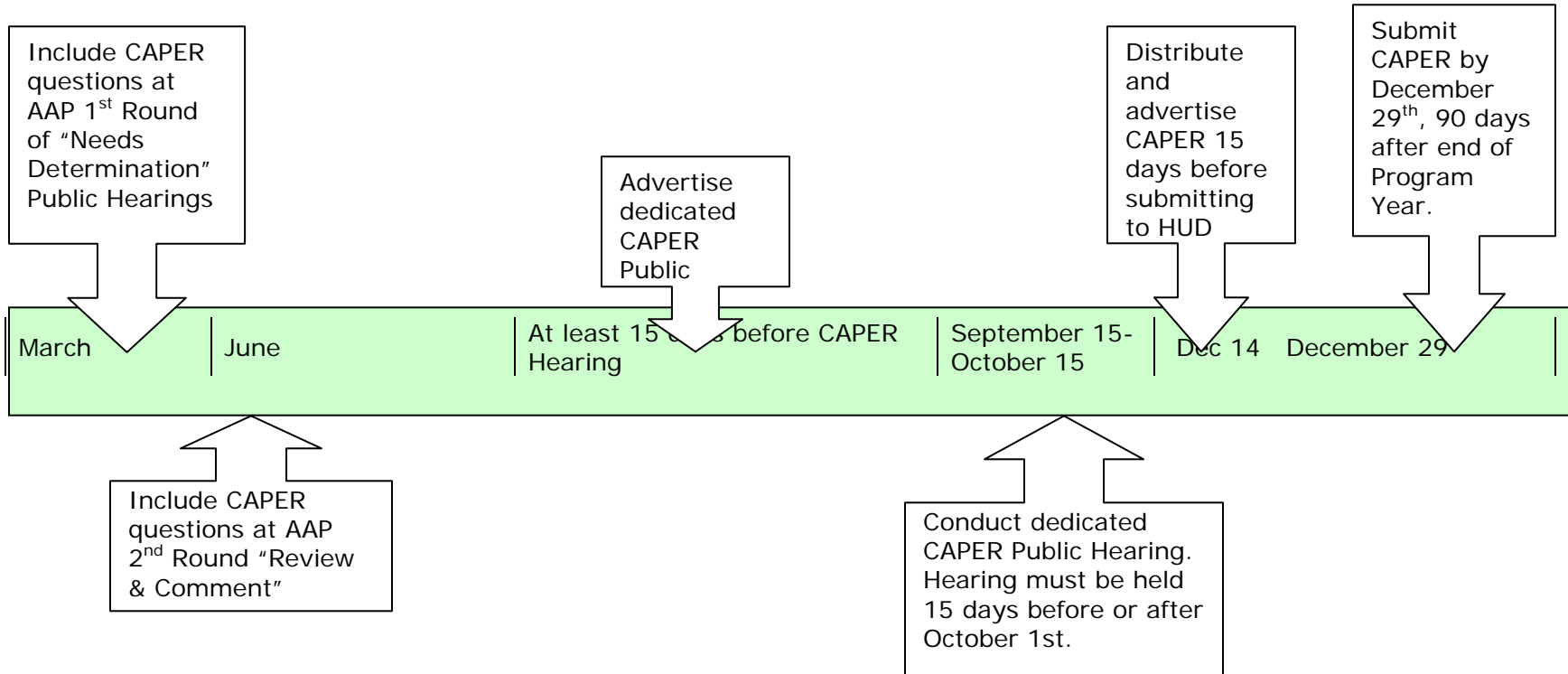
Criteria for Substantial Amendments to the Consolidated Plan

A Substantial Amendment is defined as a change in the use of CDBG or HOME funds from one eligible activity to another, if the change involves an amount greater than five percent of the total County CDBG grant for the year in which the change is being made, if there is a meaningful change in the geographic location, or if the change in location would result in a substantial decrease in the number of low or moderate-income persons benefiting from the activity.

Annual Action Plan Timeline



CAPER Timeline





**ANTI-DISPLACEMENT,
REAL PROPERTY ACQUISITION AND
RELOCATION ASSISTANCE PLAN**

April 2010

St. Clair County Intergovernmental Grants Department

Table of Contents

	Page
Introduction	1
Real Property Acquisition	1
Basic Acquisition Policies	2
Appraisals for Federally-Assisted Programs	5
Acquisition of Tenant-Owned Improvements	6
Expenses Incidental to Transfer of Title to the County	7
Certain Litigation Expenses	7
Donations	8
General Relocation Requirements	9
Relocation Notices	9
Notice of Intent to Acquire	10
Availability of Comparable Replacement Dwelling Before Displacement	11
Relocation Assistance Advisory Services	11
Coordination of Relocation Activities	14
Eligibility for Relocation Payments	14
Claims for Relocations Payments	14
Notice of Denial of Claim	15
No Waiver of Relocation Assistance	15
Aliens Not lawfully Present in the United States	15
Payments for Moving and Related Expenses	17
Payment for Actual Reasonable Moving and Related Expenses	17
Fixed Payment for Moving Expenses—Residential Moves	23

Table of Contents

	Page
Related Nonresidential Eligible Expenses	23
Reestablishment Expenses—Nonresidential Moves	23
Fixed Payment for Moving Expenses—Nonresidential Moves	24
Discretionary Utility Relocation Payments	26
Replacement Housing Payments	27
Replacement Housing Payment for 180-Day Homeowner Occupants	27
Replacement Housing Payment for 90-Day Occupants	31
Replacement Housing Payments for Persons Displaced by Community Development Block Grant (CDBG) Funded Programs or Projects	33
Additional Rules Governing Replacement Housing Payments	34
Replacement Housing of Last Resort	36
Mobile Homes	38
Applicability	38
Replacement Housing Payment for 180-Day Mobile Homeowner Displaced from a Mobile Home and/or from the Acquired Mobile Home Site	38
Replacement Housing Payment for 90-Day Mobile Home Occupants	40
Definitions	40

A. INTRODUCTION

It is the policy of the St. Clair County to take all necessary and appropriate steps to minimize displacement of persons as a result of activities assisted through its Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), and other federally funded programs for which the County may be a recipient. The County takes the following steps to minimize displacement:

1. The County encourages developers participating in the County's development programs to build on vacant lots, rehabilitate vacant rather than occupied buildings, and/or rehabilitate occupied or partly occupied buildings in stages to minimize displacement.
2. The County encourages developers participating in the County's development programs to undertake housing developments with a mix of different levels of affordability, thereby ensuring an adequate supply of low and moderately priced housing units.
3. The County will continue to fund home repair programs that provide funds to eligible homeowners, including those required to correct building code-related deficiencies, thereby assisting residents to remain within their current homes and avoid to displacement due to inability to maintain their residences.

St. Clair County requires that all developments financed with CDBG and/or HOME funds to comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (the "Uniform Act"), its implementing regulations at 49 CFR Part 24 (the Uniform Act Regulations), and the requirements of Section 104(d) of the Housing and Community Development Act of 1974, as amended (Section 104(d)), 24 CFR 570.606 (the CDBG Regulations) and/or 24 CFR 92.353 (the HOME Regulations).

B. REAL PROPERTY ACQUISITION

This section describes the policies and procedures the County will follow when it acquires real property for programs and projects where there is federal financial assistance in any part of the project costs. The relocation assistance provisions in this part are applicable to any tenants that must move as a result of an acquisition described below. Such tenants are considered displaced persons.

This section does not apply to acquisitions that meet **all** of the following conditions:

1. No specific site or property needs to be acquired, although the County may limit its search for alternative sites to a general geographic area (where the County wishes to purchase more than one site within a general geographic area on this basis, all owners will be treated similarly);

2. The property to be acquired is not part of an intended, planned, or designated project area where all or substantially all of the property within the area is to be acquired within specific time limits;
3. The County will not acquire the property if negotiations fail to result in an amicable agreement, and the owner is so informed in writing;
4. The County will inform the owner in writing of what it believes to be the market value of the property.

The County will not apply the requirements of this section to acquisitions for programs or projects undertaken by the County:

5. Without the authority to acquire property by eminent domain, provided that the County, (a) prior to making an offer for the property, clearly advises the owner that it is unable to acquire the property if negotiations fail to result in an agreement; and (b) informs the owner in writing of what it believes to be the market value of the property.
6. Acquisitions of real property from a Federal Agency, State, or State Agency, if the County does not have authority to acquire the property through condemnation.
7. The acquisition of real property by a cooperative from a person who, as a condition of membership in the cooperative, has agreed to provide without charge any real property that is needed by the cooperative.

The County will apply the requirements of this section when acquiring fee title subject to retention of a life estate or a life use; to acquisition by leasing where the lease term, including any option for extension is 50 years or more; and to the acquisition of permanent and/or temporary easements necessary for the project. However, the County may apply these requirements to any less-than-full fee acquisition that, in its judgment, should be covered.

The County will not apply these requirements to temporary easements or permits needed solely to perform work intended exclusively for the benefit of the property owner, which work may not be done if agreement cannot be reached.

8. Basic Acquisition Policies

Expeditious acquisition. The County will make every reasonable effort to acquire the real property expeditiously by negotiation. As soon as feasible, the County will notify the owner in writing of the County's interest in acquiring the real property and the basic protections provided to the owner by law and regulation. Before the initiation of negotiations the real property to be acquired will be appraised and the owner, or the owner's designated representative, will be given an opportunity to accompany the appraiser during the appraiser's inspection of the property. An appraisal will not be required if: (a) the owner is donating the property and releases the County from

its obligation to appraise the property; or (b) the County determines that an appraisal is unnecessary because the valuation problem is uncomplicated and the anticipated value of the proposed acquisition is estimated at \$10,000 or less, based on a review of available data. When an appraisal is determined to be unnecessary, the County will prepare a waiver valuation. The person performing the waiver valuation must have sufficient understanding of the local real estate market to be qualified to make the waiver valuation. The County may request that the Federal funding agency approve exceeding the \$10,000 threshold, up to a maximum of \$25,000, if the County offers the property owner the option of having the Federal funding agency appraise the property. If the property owner elects to have the Federal funding agency appraise the property, the agency will obtain an appraisal and not use the procedures described in this section.

Before the initiation of negotiations, the County will establish an amount which it believes is just compensation for the real property. The amount will not be less than the approved appraisal of the market value of the property, taking into account the value of allowable damages or benefits to any remaining property. The Manager of the Community Development Division of the County Intergovernmental Grants Department (IGD) will establish the amount believed to be just compensation. Promptly thereafter, the County will make a written offer to the owner to acquire the property for the full amount believed to be just compensation.

Along with the initial written purchase offer, the owner will be given a written statement of the basis for the offer of just compensation, which will include:

- a. A statement of the amount offered as just compensation. In the case of a partial acquisition, the compensation for the real property to be acquired and the compensation for damages, if any, to the remaining real property will be separately stated.
- b. A description and location identification of the real property and the interest in the real property to be acquired.
- c. An identification of the buildings, structures, and other improvements (including removable building equipment and trade fixtures) which are included as part of the offer of just compensation. Where appropriate, the statement will identify any other separately held ownership interest in the property, e.g., a tenant-owned improvement, and indicate that such interest is not covered by this offer.

The County will make all reasonable efforts to contact the owner or the owner's representative and discuss its offer to purchase the property, including the basis for the offer of just compensation and explain its acquisition policies and procedures, including its payment of incidental expenses. The owner will be given reasonable opportunity to consider the offer and present material which the owner believes is relevant to determining the value of the property and to suggest modification in the

proposed terms and conditions of the purchase. The County will consider the owner's presentation.

If the information presented by the owner, or a material change in the character or condition of the property, indicates the need for new appraisal information, or if a significant delay has occurred since the time of the appraisal(s) of the property, the County will have the appraisal(s) updated or obtain a new appraisal(s). If the latest appraisal information indicates that a change in the purchase offer is warranted, the County will promptly reestablish just compensation and offer that amount to the owner in writing.

The County will not advance the time of condemnation, or defer negotiations or condemnation or the deposit of funds with the court, or take any other coercive action in order to induce an agreement on the price to be paid for the property.

The purchase price for the property may exceed the amount offered as just compensation when reasonable efforts to negotiate an agreement at that amount have failed and an authorized County official approves such administrative settlement as being reasonable, prudent, and in the public interest. When Federal funds pay for or participate in acquisition costs, a written justification will be prepared, which states what available information, including trial risks, supports such a settlement.

Before requiring the owner to surrender possession of the real property, the County will pay the agreed purchase price to the owner, or in the case of a condemnation, deposit with the court, for the benefit of the owner, an amount not less than the County's approved appraisal of the market value of such property, or the court award of compensation in the condemnation proceeding for the property. In exceptional circumstances, with the prior approval of the owner, the County may obtain a right-of-entry for construction purposes before making payment available to an owner.

If the acquisition of only a portion of a property would leave the owner with an uneconomic remnant, the County will offer to acquire the uneconomic remnant along with the portion of the property needed for the project.

If the County intends to acquire any interest in real property by exercise of the power of eminent domain, it will institute formal condemnation proceedings and not intentionally make it necessary for the owner to institute legal proceedings to prove the fact of the taking of the real property.

If the County permits a former owner or tenant to occupy the real property after acquisition for a short term, or a period subject to termination by the County on short notice, the rent will not exceed the fair market rent for such occupancy.

The appraiser, review appraiser or person performing the waiver valuation will not have any interest, direct or indirect, in the real property being valued for the County. Compensation for making an appraisal or waiver valuation will not be based on the amount of the valuation estimate.

No person will attempt to unduly influence or coerce an appraiser, review appraiser, or waiver valuation preparer regarding any valuation or other aspect of an appraisal, review or waiver valuation. Persons functioning as negotiators will not supervise or formally evaluate the performance of any appraiser or review appraiser performing appraisal or appraisal review work, except that, the Federal funding agency may waive this requirement if it determines it would create a hardship for the County.

An appraiser, review appraiser, or waiver valuation preparer making an appraisal, appraisal review or waiver valuation may be authorized by the County to act as a negotiator for real property for which that person has made an appraisal, appraisal review or waiver valuation only if the offer to acquire the property is \$10,000, or less.

9. Appraisals for Federally-Assisted Programs

This section sets forth the requirements for real property acquisition appraisals for federally assisted programs. The County will have appraisals prepared according to these requirements, which are intended to be consistent with the Uniform Standards of Professional Appraisal Practice (USPAP) published by The Appraisal Foundation.

Owner Retention of Improvements. If the County permits an owner of a property improvement to retain it for removal from the project site, the County will offer the owner an amount for the real property to be acquired at least equal to the difference between the amount determined to be just compensation for the owner's entire interest in the real property and the salvage value of the retained improvement.

The County will establish criteria for determining the minimum qualifications and competency of appraisers and review appraisers. Qualifications will be consistent with the scope of work for the assignment. The County will review the experience, education, training, certification/licensing, designation(s) and other qualifications of appraisers, and review appraisers, and use only those determined by the County to be qualified.

If the County uses a contract (fee) appraiser to perform the appraisal, the appraiser will be State licensed or certified in accordance with Title XI of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989 (FIRREA) (12 U.S.C. 3331 et seq.).

The County will have an appraisal review process and, at a minimum:

- a. A qualified review appraiser will examine the presentation and analysis of market information in all appraisals to assure that they meet the definition of appraisal found in the Uniform Act Regulations and other applicable requirements and support the appraiser's opinion of value. The level of review analysis will depend on the complexity of the appraisal problem. As needed, the review appraiser will, prior to acceptance, seek necessary corrections or revisions. The review appraiser will identify each appraisal report as recommended (as the basis for the establishment of the amount believed to be just compensation), accepted (meets all requirements, but not selected as recommended or approved), or not accepted. If authorized by the County to do so, the staff review appraiser will also approve the appraisal (as the basis for the establishment of the amount believed to be just compensation), and, if also authorized to do so, develop and report the amount believed to be just compensation.
- b. If the review appraiser is unable to recommend (or approve) an appraisal as an adequate basis for the establishment of the offer of just compensation, and it is determined by the County that it is not practical to obtain an additional appraisal, the review appraiser may, as part of the review, present and analyze market information in conformance with the Uniform Act Regulations to support a recommended (or approved) value.
- c. The review appraiser will prepare a written report that identifies the appraisal reports reviewed and documents the findings and conclusions arrived at during the review of the appraisal(s). Any damages or benefits to any remaining property will be identified in the review appraiser's report. The review appraiser will also prepare a signed certification that states the parameters of the review. The certification will state the approved value, and, if the review appraiser is authorized to do so, the amount believed to be just compensation for the acquisition.

10. Acquisition of Tenant-Owned Improvements

When acquiring any interest in real property, the County will offer to acquire at least an equal interest in all buildings, structures, or other improvements located upon the real property to be acquired, which it requires to be removed or which it determines will be adversely affected by the use to which the real property will be put. This will include any improvement of a tenant-owner who has the right or obligation to remove the improvement at the expiration of the lease term.

Improvements Considered To Be Real Property. Any building, structure, or other improvement, which would be considered to be real property if owned by the owner of the real property on which it is located, will be considered to be real property for purposes of the County's Real Property Acquisition Policy.

Appraisal and Establishment of Just Compensation for a Tenant-Owned Improvement. Just compensation for a tenant-owned improvement is the amount which the improvement contributes to the market value of the whole property, or its salvage value, whichever is greater.

Special Conditions for Tenant-Owned Improvements. No payment will be made to a tenant-owner for any real property improvement unless:

- a. The tenant-owner, in consideration for the payment, assigns, transfers, and releases to the County all of the tenant-owner's right, title, and interest in the improvement;
- b. The owner of the real property on which the improvement is located disclaims all interest in the improvement; and
- c. The payment does not result in the duplication of any compensation otherwise authorized by law.

11. Expenses Incidental to Transfer of Title to the County

The County will reimburse the owner of the real property for all reasonable expenses the owner necessarily incurred for:

- a. Recording fees, transfer taxes, documentary stamps, evidence of title, boundary surveys, legal descriptions of the real property, and similar expenses incidental to conveying the real property to the County. However, the County will not pay costs solely required to perfect the owner's title to the real property;
- b. Penalty costs and other charges for prepayment of any preexisting recorded mortgage entered into in good faith encumbering the real property; and
- c. The pro rata portion of any prepaid real property taxes which are allocable to the period after the County obtains title to the property or effective possession of it, whichever is earlier.

Whenever feasible, the County will pay these costs directly to the billing agent so that the owner will not have to pay such costs and then seek reimbursement from the County.

12. Certain Litigation Expenses

The County will reimburse the owner of the real property for any reasonable expenses, including reasonable attorney, appraisal, and engineering fees, which the owner actually incurred because of a condemnation proceeding, if:

- a. The final judgment of the court is that the County cannot acquire the real property by condemnation;

- b. The condemnation proceeding is abandoned by the County other than under an agreed-upon settlement; or
- c. The court having jurisdiction renders a judgment in favor of the owner in an inverse condemnation proceeding or the County effects a settlement of such proceeding.

13. Donations

An owner whose real property is being acquired may, after being fully informed by the County of the right to receive just compensation for the property, donate the property or any part thereof, any interest therein, or any compensation paid therefore, to the County as the owner shall determine. The County will be responsible for ensuring that an appraisal of the real property is obtained unless the owner releases the County from the obligation to do so.

Each notice the County provides to a property owner or occupant will be sent by registered first-class mail, return receipt requested, and documented in Agency files. Each notice will be written in plain, understandable language. Persons who are unable to read and understand the notice will be provided with appropriate translation and counseling. Each notice will indicate the name and telephone number of a person who may be contacted for answers to questions or other needed help.

The County will maintain adequate records of its acquisition and displacement activities in sufficient detail to demonstrate compliance with the applicable Federal laws and regulations. These records will be retained for at least 3 years after each owner of a property and each person displaced from the property receives the final payment to which he or she is entitled, or in accordance with the applicable regulations of the Federal funding Agency, whichever is later.

Records maintained by the County are confidential regarding their use as public information, unless applicable law provides otherwise.

The County will promptly review appeals in accordance with the requirements of the applicable laws and regulations. Any aggrieved person may file a written appeal with the County in any case in which the person believes that the County has failed to properly consider the person's application for relocation assistance. Such assistance may include, but is not limited to, the person's eligibility for, or the amount of, a payment required under the regulations. The County will consider a written appeal regardless of form.

The County may limit the time for a person to file an appeal to not less than 60 days after the person receives written notification of the County's determination on the person's claim.

A person has a right to be represented by legal counsel or other representative in connection with his or her appeal, but solely at the person's own expense.

The County will permit a person to inspect and copy all materials pertinent to his or her appeal, except materials which are classified as confidential by the County. The County may, however, impose reasonable conditions on the person's right to inspect, consistent with applicable laws.

In deciding an appeal, the County will consider all pertinent justification and other material submitted by the person, and all other available information that is needed to ensure a fair and full review of the appeal.

Promptly after receipt of all information submitted by a person in support of an appeal, the County will make a written determination on the appeal, including an explanation of the basis on which the decision was made, and furnish the person a copy. If the full relief requested is not granted, the County will advise the person of his or her right to seek judicial review of the County's decision.

The County official conducting the review of the appeal will be the Executive Director of the Intergovernmental Grants Department or his or her authorized designee.

C. GENERAL RELOCATION REQUIREMENTS

This section describes the policies and procedures the County will follow when providing relocation payments and other relocation assistance. These policies apply to the relocation of any displaced person as defined above. The County will fully inform any person who qualifies as a displaced person of his or her rights and entitlements to relocation assistance and payments provided by the Uniform Act, the Uniform Act Regulations, Section 104(d), the CDBG Regulations and/or the HOME Regulations, as applicable.

1. Relocation Notices

As soon as feasible, the County will furnish a person scheduled to be displaced with a general written description of the County's relocation program which:

- a. Informs the person that he or she may be displaced for the project and generally describes the relocation payment(s) for which the person may be eligible, the basic conditions of eligibility, and the procedures for obtaining the payment(s);
- b. Informs the displaced person that he or she will be given reasonable relocation advisory services, including referrals to replacement properties, help in filing payment claims, and other necessary assistance to help the displaced person successfully relocate;

- c. Informs the displaced person that he or she will not be required to move without at least 90 days advance written notice, and informs any person to be displaced from a dwelling that he or she cannot be required to move permanently unless at least one comparable replacement dwelling has been made available;
- d. Informs the displaced person that any person who is an alien not lawfully present in the United States is ineligible for relocation advisory services and relocation payments, unless such ineligibility would result in exceptional and extremely unusual hardship to a qualifying spouse, parent, or child; and
- e. Describes the displaced person's right to appeal the County's determination as to a person's application for assistance for which a person may be eligible.

Eligibility for relocation assistance will begin on the date of a "notice of intent to acquire," the initiation of negotiations, or actual acquisition, whichever occurs first. When this occurs, the County will promptly notify all occupants in writing of their eligibility for applicable relocation assistance.

St. Clair County will not require any lawful occupant to move unless he or she has received at least 90 days advance written notice of the earliest date by which he or she may be required to move. The 90-day notice will either state a specific date as the earliest date by which the occupant may be required to move, or state that the occupant will receive a further notice indicating, at least 30 days in advance, the specific date by which he or she must move. If the 90-day notice is issued before a comparable replacement dwelling is made available, the notice will state clearly that the occupant will not have to move earlier than 90 days after such a dwelling is made available.

In unusual circumstances, an occupant may be required to vacate the property on less than 90 days advance written notice if the County determines that a 90-day notice is impracticable, such as when the person's continued occupancy of the property would constitute a substantial danger to health or safety. In such a case, a copy of the County's determination will be included in the applicable case file.

2. Notice of Intent to Acquire

The notice of intent to acquire is the written communication the County provides to a person to be displaced (including those to be displaced by rehabilitation or demolition activities from property acquired prior to the commitment of federal financial assistance to the activity), which clearly sets forth that the County intends to acquire the property. A notice of intent to acquire establishes eligibility for relocation assistance prior to the initiation of negotiations and/or prior to the commitment of federal financial assistance.

3. Availability of Comparable Replacement Dwelling Before Displacement

The County will not require any person to be displaced to move from his or her dwelling unless at least one comparable replacement dwelling has been made available to the person. When possible, three or more comparable replacement dwellings will be made available. A comparable replacement dwelling will be considered to have been made available to a person, if:

- a. The person is informed of its location;
- b. The person has sufficient time to negotiate and enter into a purchase agreement or lease for the property; and
- c. Subject to reasonable safeguards, the person is assured of receiving the relocation assistance and acquisition payment to which the person is entitled in sufficient time to complete the purchase or lease of the property.

Exceptions may be made when a person must move because of:

- d. A major disaster;
- e. A presidentially declared national emergency; or
- f. Another emergency which requires immediate vacation of the real property, such as when continued occupancy of the displacement dwelling constitutes a substantial danger to the health or safety of the occupants or the public.

Whenever a person to be displaced is required to relocate from the displacement dwelling for a temporary period because of an emergency as described above, the County will:

- g. Take whatever steps are necessary to assure that the person is temporarily relocated to a decent, safe, and sanitary dwelling;
- h. Pay the actual reasonable out-of-pocket moving expenses and any reasonable increase in rent and utility costs incurred in connection with the temporary relocation; and
- i. Make available to the displaced person as soon as feasible, at least one comparable replacement dwelling. (For purposes of filing a claim and meeting the eligibility requirements for a relocation payment, the date of displacement is the date the person moves from the temporarily occupied dwelling.)

4. Relocation Assistance Advisory Services

The County will carry out a relocation assistance advisory program which satisfies the requirements of Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d *et seq.*), Title VIII of the Civil Rights Act of 1968 (42 U.S.C. 3601 *et seq.*), and Executive Order 11063 (27 FR 11527, November 24, 1962), and offer the services described here. If the County determines that a person occupying property adjacent to the real property

acquired for the project is caused substantial economic injury because of such acquisition, it may offer advisory services to such person.

The advisory program will include such measures, facilities, and services as may be necessary or appropriate in order to:

- a. Determine, for nonresidential (businesses, farm and nonprofit organizations) displacements, the relocation needs and preferences of each business, farm and nonprofit organization to be displaced and explain the relocation payments and other assistance for which the business may be eligible, the related eligibility requirements, and the procedures for obtaining such assistance. This will include a personal interview with each business. At a minimum, interviews with displaced business owners and operators will include the following items:
 - (i) The business's replacement site requirements, current lease terms and other contractual obligations and the financial capacity of the business to accomplish the move.
 - (ii) Determination of the need for outside specialists in accordance with the Uniform Act Regulations that will be required to assist in planning the move, assistance in the actual move, and in the reinstallation of machinery and/or other personal property.
 - (iii) For businesses, an identification and resolution of personalty/realty issues. Every effort will be made to identify and resolve realty/personalty issues prior to, or at the time of, the appraisal of the property.
 - (iv) An estimate of the time required for the business to vacate the site.
 - (v) An estimate of the anticipated difficulty in locating a replacement property.
 - (vi) An identification of any advance relocation payments required for the move, and the County's legal capacity to provide them.
- b. Determine, for residential displacements, the relocation needs and preferences of each person to be displaced and explain the relocation payments and other assistance for which the person may be eligible, the related eligibility requirements, and the procedures for obtaining such assistance. This will include a personal interview with each residential displaced person.
 - (i) Provide current and continuing information on the availability, purchase prices, and rental costs of comparable replacement dwellings, and explain that the person cannot be required to move unless at least one comparable replacement dwelling is made available.

- (ii) As soon as feasible, the County will inform the person in writing of the specific comparable replacement dwelling and the price or rent used for establishing the upper limit of the replacement housing payment and the basis for the determination, so that the person is aware of the maximum replacement housing payment for which he or she may qualify.
 - (iii) Where feasible, housing will be inspected prior to being made available to assure that it meets applicable standards. If such an inspection is not made, the County will notify the person to be displaced that a replacement housing payment may not be made unless the replacement dwelling is subsequently inspected and determined to be decent, safe, and sanitary.
 - (iv) Whenever possible, minority persons will be given reasonable opportunities to relocate to decent, safe, and sanitary replacement dwellings, not located in an area of minority concentration, that are within their financial means. This does not mean, however, that the County will provide a person a larger payment than is necessary to enable a person to relocate to a comparable replacement dwelling.
 - (v) The County will offer all persons transportation to inspect housing to which they are referred.
 - (vi) Any displaced person that may be eligible for government housing assistance at the replacement dwelling will be advised of any requirements of such government housing assistance program that would limit the size of the replacement dwelling, as well as of the long term nature of such rent subsidy, and the limited (42 month) duration of the relocation rental assistance payment.
- c. Provide, for nonresidential moves, current and continuing information on the availability, purchase prices, and rental costs of suitable commercial and farm properties and locations. Assist any person displaced from a business or farm operation to obtain and become established in a suitable replacement location.
 - d. Minimize hardships to persons in adjusting to relocation by providing counseling, advice as to other sources of assistance that may be available, and such other help as may be appropriate.
 - e. Supply persons to be displaced with appropriate information concerning Federal and State housing programs, disaster loan and other programs administered by the Small Business Administration, and other Federal and State programs offering assistance to displaced persons, and technical help to persons applying for such assistance.

5. Coordination of Relocation Activities

The County will coordinate its relocation activities with project work and other displacement-causing activities to ensure that, to the extent feasible, persons displaced receive consistent treatment and the duplication of functions is minimized.

Any person who occupies property acquired by the County, when such occupancy began subsequent to the acquisition of the property, and the occupancy is permitted by a short term rental agreement or an agreement subject to termination when the property is needed for a program or project, will be eligible for advisory services, as determined by the County.

6. Eligibility for Relocation Payments

Any person who occupies a real property and is not in unlawful occupancy on the date of the initiation of negotiations, will be presumed to be entitled to relocation payments and other assistance set forth in this policy unless the County determines that:

- a. The person received an eviction notice prior to the initiation of negotiations and, as a result of that notice is later evicted; or
- b. The person is evicted after the initiation of negotiations for serious or repeated violation of material terms of the lease or occupancy agreement; and
- c. In either case the eviction was not undertaken for the purpose of evading the obligation to make available the payments and other assistance set forth in this policy.

For purposes of determining eligibility for relocation payments, the date of displacement is the date the person moves, or if later, the date a comparable replacement dwelling is made available. This section applies only to persons who would otherwise have been displaced by the project.

7. Claims for Relocation Payments

Any claim for a relocation payment must be supported by such documentation as may be reasonably required to support expenses incurred, such as bills, certified prices, appraisals, or other evidence of such expenses. The County will provide reasonable assistance to displaced persons necessary to complete and file any required claim for payment.

The County will review claims in an expeditious manner. The claimant will be promptly notified as to any additional documentation that is required to support the claim. Payment for a claim will be made as soon as feasible following receipt of sufficient documentation to support the claim.

If a person demonstrates the need for an advanced relocation payment in order to avoid or reduce a hardship, the County will issue the payment, subject to such safeguards as are appropriate to ensure that the objective of the payment is accomplished.

All claims for a relocation payment must be filed with the County no later than 18 months after:

- a. For tenants, the date of displacement.
- b. For owners, the date of displacement or the date of the final payment for the acquisition of the real property, whichever is later.

The County will waive this time period for good cause.

8. Notice of Denial of Claim

If the County disapproves all or part of a payment claimed or refuses to consider the claim on its merits because of untimely filing or other grounds, it will promptly notify the claimant in writing of its determination, the basis for its determination, and the procedures for appealing that determination.

9. No Waiver of Relocation Assistance

The County will not propose or request that a displaced person waive his or her rights or entitlements to relocation assistance and benefits provided by the Uniform Act, the Uniform Act Regulations, the requirements of the CDBG Regulations and/or the HOME Regulations, as applicable.

10. Aliens Not Lawfully Present in the United States

- a. Each person seeking relocation payments or relocation advisory assistance shall, as a condition of eligibility, certify:
 - (i) In the case of an individual, that he or she is either a citizen or national of the United States, or an alien who is lawfully present in the United States.
 - (ii) In the case of a family, that each family member is either a citizen or national of the United States, or an alien who is lawfully present in the United States. The certification may be made by the head of the household on behalf of other family members.
 - (iii) In the case of an unincorporated business, farm, or nonprofit organization, that each owner is either a citizen or national of the United States, or an alien who is lawfully present in the United States. The certification may be made by the principal owner,

manager, or operating officer on behalf of other persons with an ownership interest.

- (iv) In the case of an incorporated business, farm, or nonprofit organization, that the corporation is authorized to conduct business within the United States.
- b. The certification provided pursuant to paragraphs (a)(i), (ii and (iii) immediately above shall indicate whether such person is either a citizen or national of the United States, or an alien who is lawfully present in the United States.
- c. In computing relocation payments under the Uniform Act, if any member(s) of a household or owner(s) of an unincorporated business, farm, or nonprofit organization is (are) determined to be ineligible because of a failure to be legally present in the United States, no relocation payments will be made to him or her. Any payment(s) for which such household, unincorporated business, farm, or nonprofit organization would otherwise be eligible will be computed for the household, based on the number of eligible household members and for the unincorporated business, farm, or nonprofit organization, based on the ratio of ownership between eligible and ineligible owners.
- d. The County will consider the certification provided pursuant to paragraph 1 of this section to be valid, unless the County determines in accordance with paragraph 6 of this section that it is invalid based on a review of an alien's documentation or other information that the County considers reliable and appropriate.
- e. Any review by the County of the certifications provided pursuant to paragraph 1 of this section will be conducted in a nondiscriminatory fashion. The County will apply the same standard of review to all such certifications it receives, except that such standard may be revised periodically.
- f. If, based on a review of an alien's documentation or other credible evidence, the County has reason to believe that a person's certification is invalid (for example a document reviewed does not on its face reasonably appear to be genuine), and that, as a result, such person may be an alien not lawfully present in the United States, it shall obtain the following information before making a final determination:
 - (i) If the County has reason to believe that the certification of a person who has certified that he or she is an alien lawfully present in the United States is invalid, the County will obtain verification of the alien's status from the local Bureau of Citizenship and Immigration Service (BCIS) Office. Any request for BCIS verification will include the alien's full name, date of birth and alien number, and a copy of the alien's documentation. (If the County is unable to contact the

BCIS, it may contact the FHWA in Washington, DC, Office of Real Estate Services or Office of Chief Counsel for a referral to the BCIS.)

- (ii) If the County has reason to believe that the certification of a person who has certified that he or she is a citizen or national is invalid, the County will request evidence of United States citizenship or nationality from such person and, if considered necessary, verify the accuracy of such evidence with the issuer.
- g. No relocation payments or relocation advisory assistance will be provided to a person who has not provided the certification described in this section or who has been determined to be not lawfully present in the United States, unless such person can demonstrate to the County's satisfaction that the denial of relocation assistance will result in an exceptional and extremely unusual hardship to such person's spouse, parent, or child who is a citizen of the United States, or is an alien lawfully admitted for permanent residence in the United States.
- h. For purposes of paragraph 7 of this section, "exceptional and extremely unusual hardship" to such spouse, parent, or child of the person not lawfully present in the United States means that the denial of relocation payments and advisory assistance to such person will directly result in:
 - (i) A significant and demonstrable adverse impact on the health or safety of such spouse, parent, or child;
 - (ii) A significant and demonstrable adverse impact on the continued existence of the family unit of which such spouse, parent, or child is a member; or
 - (iii) Any other impact that the County determines will have a significant and demonstrable adverse impact on such spouse, parent, or child.

D. PAYMENTS FOR MOVING AND RELATED EXPENSES

1. Payment for Actual Reasonable Moving and Related Expenses

a. General

- (i) Any owner-occupant or tenant who qualifies as a displaced person and who moves from a dwelling (including a mobile home) or who moves from a business, farm or nonprofit organization is entitled to payment of his or her actual moving and related expenses, as the County determines to be reasonable and necessary.
- (ii) A non-occupant owner of a rented mobile home is eligible for actual cost reimbursement to relocate the mobile home. If the mobile home is not acquired as real estate, but the homeowner-occupant obtains a replacement housing payment, the home-owner occupant is not

eligible for payment for moving the mobile home, but may be eligible for a payment for moving personal property from the mobile home.

b. Moves from a dwelling.

- (i) A displaced person's actual, reasonable and necessary moving expenses for moving personal property from a dwelling may be determined based on the cost of one, or a combination of the following methods: (self-moves based on the lower of two bids or estimates are not eligible for reimbursement under this section)
 - (A) Commercial move—moves performed by a professional mover.
 - (B) Self-move—moves that may be performed by the displaced person in one or a combination of the following methods:
 - (AA) Fixed Residential Moving Cost Schedule.
 - (BB) Actual cost move, supported by receipted bills for labor and equipment. Hourly labor rates should not exceed the cost paid by a commercial mover. Equipment rental fees should be based on the actual cost of renting the equipment but not exceed the cost paid by a commercial mover.
 - (C) Moves from a mobile home. A displaced person's actual, reasonable and necessary moving expenses for moving personal property from a mobile home may be determined based on the cost of one, or a combination of the following methods: (self-moves based on the lower of two bids or estimates are not eligible for reimbursement under this section.

c. Moves from a business, farm or nonprofit organization.

Personal property as determined by an inventory from a business, farm or nonprofit organization may be moved by one or a combination of the following methods:

- (i) Commercial move—based on the lower of two bids or estimates prepared by a commercial mover. At the County's discretion, payment for a low cost or uncomplicated move may be based on a single bid or estimate.
- (ii) Self-move—a self-move payment may be based on one or a combination of the following:
 - (A) The lower of two bids or estimates prepared by a commercial mover or qualified County staff person. At the County's discretion, payment for a low cost or

uncomplicated move may be based on a single bid or estimate; or

- (B) Supported by receipted bills for labor and equipment. Hourly labor rates should not exceed the rates paid by a commercial mover to employees performing the same activity and, equipment rental fees should be based on the actual rental cost of the equipment but not to exceed the cost paid by a commercial mover.

- d. Personal property only. Eligible expenses for a person who is required to move personal property from real property but is not required to move from a dwelling (including a mobile home), business, farm or nonprofit organization
- e. Advertising signs. The amount of a payment for direct loss of an advertising sign, which is personal property shall be the lesser of:
 - (i) The depreciated reproduction cost of the sign, as determined by the County, less the proceeds from its sale; or
 - (ii) The estimated cost of moving the sign, but with no allowance for storage.
- f. Eligible actual moving expenses.
 - (i) Transportation of the displaced person and personal property. Transportation costs for a distance beyond 50 miles are not eligible, unless the County determines that relocation beyond 50 miles is justified.
 - (ii) Packing, crating, unpacking, and uncrating of the personal property.
 - (iii) Disconnecting, dismantling, removing, reassembling, and reinstalling relocated household appliances and other personal property. For businesses, farms or nonprofit organizations this includes machinery, equipment, substitute personal property, and connections to utilities available within the building; it also includes modifications to the personal property, including those mandated by Federal, State or local law, code or ordinance, necessary to adapt it to the replacement structure, the replacement site, or the utilities at the replacement site, and modifications necessary to adapt the utilities at the replacement site to the personal property.
 - (iv) Storage of the personal property for a period not to exceed 12 months, unless the County determines that a longer period is necessary.
 - (v) Insurance for the replacement value of the property in connection with the move and necessary storage.

- (vi) The replacement value of property lost, stolen, or damaged in the process of moving (not through the fault or negligence of the displaced person, his or her agent, or employee) where insurance covering such loss, theft, or damage is not reasonably available.
- (vii) Other moving-related expenses that are not listed as ineligible under the Uniform Act Regulations as the County determines to be reasonable and necessary.
- (viii) The reasonable cost of disassembling, moving, and reassembling any appurtenances attached to a mobile home, such as porches, decks, skirting, and awnings, which were not acquired, anchoring of the unit, and utility “hookup” charges.
- (ix) The reasonable cost of repairs and/or modifications so that a mobile home can be moved and/or made decent, safe and sanitary.
- (x) The cost of a nonrefundable mobile home park entrance fee, to the extent it does not exceed the fee at a comparable mobile home park, if the person is displaced from a mobile home park or the County determines that payment of the fee is necessary to effect relocation.
- (xi) Any license, permit, fees or certification required of the displaced person at the replacement location. However, the payment may be based on the remaining useful life of the existing license, permit, fees or certification.
- (xii) Professional services as the County determines to be actual, reasonable and necessary for:
 - (A) Planning the move of the personal property;
 - (B) Moving the personal property; and
 - (C) Installing the relocated personal property at the replacement location.
- (xiii) Relettering signs and replacing stationery on hand at the time of displacement that are made obsolete as a result of the move.
- (xiv) Actual direct loss of tangible personal property incurred as a result of moving or discontinuing the business or farm operation. The payment shall consist of the lesser of:
 - (A) The fair market value in place of the item, as is for continued use, less the proceeds from its sale. (To be eligible for payment, the claimant must make a good faith effort to sell the personal property, unless the County determines that such effort is not necessary. When payment for property loss is claimed for goods held for sale, the market value shall

be based on the cost of the goods to the business, not the potential selling prices.); or

- (B) The estimated cost of moving the item as is, but not including any allowance for storage; or for reconnecting a piece of equipment if the equipment is in storage or not being used at the acquired site. If the business or farm operation is discontinued, the estimated cost of moving the item shall be based on a moving distance of 50 miles.
- (xv) The reasonable cost incurred in attempting to sell an item that is not to be relocated.
- (xvi) Purchase of substitute personal property. If an item of personal property, which is used as part of a business or farm operation is not moved but is promptly replaced with a substitute item that performs a comparable function at the replacement site, the displaced person is entitled to payment of the lesser of:
- (A) The cost of the substitute item, including installation costs of the replacement site, minus any proceeds from the sale or trade-in of the replaced item; or
 - (B) The estimated cost of moving and reinstalling the replaced item but with no allowance for storage. At the County's discretion, the estimated cost for a low cost or uncomplicated move may be based on a single bid or estimate.
- (xvii) Searching for a replacement location. A business or farm operation is entitled to reimbursement for actual expenses, not to exceed \$2,500, as the County determines to be reasonable, which are incurred in searching for a replacement location, including:
- (A) Transportation;
 - (B) Meals and lodging away from home;
 - (C) Time spent searching, based on reasonable salary or earnings;
 - (D) Fees paid to a real estate agent or broker to locate a replacement site, exclusive of any fees or commissions related to the purchase of such sites;
 - (E) Time spent in obtaining permits and attending zoning hearings; and
 - (F) Time spent negotiating the purchase of a replacement site based on a reasonable salary or earnings.

- (xviii) Low value/high bulk. When the personal property to be moved is of low value and high bulk, and the cost of moving the property would be disproportionate to its value in the judgment of the County, the allowable moving cost payment shall not exceed the lesser of: the amount which would be received if the property were sold at the site or the replacement cost of a comparable quantity delivered to the new business location. Examples of personal property covered by this provision include, but are not limited to, stockpiled sand, gravel, minerals, metals and other similar items of personal property as determined by the County.
- g. Ineligible moving and related expenses. A displaced person is not entitled to payment for:
 - (i) The cost of moving any structure or other real property improvement in which the displaced person reserved ownership.;
 - (ii) Interest on a loan to cover moving expenses;
 - (iii) Loss of goodwill;
 - (iv) Loss of profits;
 - (v) Loss of trained employees;
 - (vi) Any additional operating expenses of a business or farm operation incurred because of operating in a new location;
 - (vii) Personal injury;
 - (viii) Any legal fee or other cost for preparing a claim for a relocation payment or for representing the claimant before the County;
 - (ix) Expenses for searching for a replacement dwelling;
 - (x) Physical changes to the real property at the replacement location of a business or farm operation;
 - (xi) Costs for storage of personal property on real property already owned or leased by the displaced person, and
 - (xii) Refundable security and utility deposits.
- h. Notification and inspection (nonresidential). The County will inform the displaced person, in writing, of the requirements of this section as soon as possible after the initiation of negotiations. To be eligible for payments under this section the displaced person must:
 - (i) Provide the County reasonable advance notice of the approximate date of the start of the move or disposition of the personal property and an inventory of the items to be moved. However, the County may waive this notice requirement after documenting its file accordingly.

- (ii) Permit the County to make reasonable and timely inspections of the personal property at both the displacement and replacement sites and to monitor the move.
- i. Transfer of ownership (nonresidential). Upon request and in accordance with applicable law, the claimant shall transfer to the County ownership of any personal property that has not been moved, sold, or traded in.

2. Fixed Payment for Moving Expenses—Residential Moves

Any person displaced from a dwelling or a seasonal residence or a dormitory style room is entitled to receive a fixed moving cost payment as an alternative to a payment for actual moving and related expenses. This payment shall be determined according to the most recent edition of the Fixed Residential Moving Cost Schedule 3 approved by the Federal Highway Administration and published in the Federal Register on a periodic basis. The payment to a person with minimal personal possessions who is in occupancy of a dormitory style room or a person whose residential move is performed by the County at no cost to the person shall be limited to the amount stated in the most recent edition of the Fixed Residential Moving Cost Schedule.

3. Related Nonresidential Eligible Expenses

The following expenses, in addition to those provided for moving personal property, shall be provided if the County determines that they are actual, reasonable and necessary:

- a. Connection to available nearby utilities from the right-of-way to improvements at the replacement site.
- b. Professional services performed prior to the purchase or lease of a replacement site to determine its suitability for the displaced person's business operation including but not limited to, soil testing, feasibility and marketing studies (excluding any fees or commissions directly related to the purchase or lease of such site). At the discretion of the County a reasonable pre-approved hourly rate may be established.
- c. Impact fees or one time assessments for anticipated heavy utility usage, as determined necessary by the County.

4. Reestablishment Expenses—Nonresidential Moves

A small business, farm or nonprofit organization is entitled to receive a payment, not to exceed \$10,000, for expenses actually incurred in relocating and reestablishing such small business, farm or nonprofit organization at a replacement site.

- a. Eligible expenses. Reestablishment expenses must be reasonable and necessary, as determined by the County. They include, but are not limited to, the following:
 - (i) Repairs or improvements to the replacement real property as required by Federal, State or local law, code or ordinance.
 - (ii) Modifications to the replacement property to accommodate the business operation or make replacement structures suitable for conducting the business.
 - (iii) Construction and installation costs for exterior signing to advertise the business.
 - (iv) Redecoration or replacement of soiled or worn surfaces at the replacement site, such as paint, paneling, or carpeting.
 - (v) Advertisement of replacement location.
 - (vi) Estimated increased costs of operation during the first 2 years at the replacement site for such items as:
 - (A) Lease or rental charges;
 - (B) Personal or real property taxes;
 - (C) Insurance premiums; and
 - (D) Utility charges, excluding impact fees.
 - (vii) Other items that the County considers essential to the reestablishment of the business.
- b. Ineligible expenses. The following is a nonexclusive listing of reestablishment expenditures not considered to be reasonable, necessary, or otherwise eligible:
 - (i) Purchase of capital assets, such as, office furniture, filing cabinets, machinery, or trade fixtures.
 - (ii) Purchase of manufacturing materials, production supplies, product inventory, or other items used in the normal course of the business operation.
 - (iii) Interest on money borrowed to make the move or purchase the replacement property.
 - (iv) Payment to a part-time business in the home which does not contribute materially to the household income.

5. Fixed Payment for Moving Expenses—Nonresidential Moves

- a. Business. A displaced business may be eligible to choose a fixed payment in lieu of the payments for actual moving and related expenses, and actual

reasonable reestablishment expenses. Such fixed payment, except for payment to a nonprofit organization, shall equal the average annual net earnings of the business, as computed in accordance with paragraph 5 of this section, but not less than \$1,000 nor more than \$20,000. The displaced business is eligible for the payment if the County determines that:

- (i) The business owns or rents personal property which must be moved in connection with such displacement and for which an expense would be incurred in such move and, the business vacates or relocates from its displacement site;
 - (ii) The business cannot be relocated without a substantial loss of its existing patronage (clientele or net earnings). A business is assumed to meet this test unless the County determines that it will not suffer a substantial loss of its existing patronage;
 - (iii) The business is not part of a commercial enterprise having more than three other entities which are not being acquired by the County, and which are under the same ownership and engaged in the same or similar business activities.
 - (iv) The business is not operated at a displacement dwelling solely for the purpose of renting such dwelling to others;
 - (v) The business is not operated at the displacement site solely for the purpose of renting the site to others; and
 - (vi) The business contributed materially to the income of the displaced person during the 2 taxable years prior to displacement.
- b. Determining the number of businesses. In determining whether two or more displaced legal entities constitute a single business, which is entitled to only one fixed payment, all pertinent factors shall be considered, including the extent to which:
- (i) The same premises and equipment are shared;
 - (ii) Substantially identical or interrelated business functions are carried out and business and financial affairs are commingled;
 - (iii) The entities are held out to the public, and to those customarily dealing with them, as one business; and
 - (iv) The same person or closely related persons own, control, or manage the affairs of the entities.
- c. Farm operation. A displaced farm operation may choose a fixed payment, in lieu of the payments for actual moving and related expenses and actual reasonable reestablishment expenses, in an amount equal to its average annual net earnings as computed in accordance with paragraph e of this section, but not less than \$1,000 nor more than \$20,000. In the case of a

partial acquisition of land, which was a farm operation before the acquisition, the fixed payment shall be made only if the County determines that:

- (i) The acquisition of part of the land caused the operator to be displaced from the farm operation on the remaining land; or
 - (ii) The partial acquisition caused a substantial change in the nature of the farm operation.
- d. Nonprofit organization. A displaced nonprofit organization may choose a fixed payment of \$1,000 to \$20,000, in lieu of the payments for actual moving and related expenses and actual reasonable reestablishment expenses, if the County determines that it cannot be relocated without a substantial loss of existing patronage (membership or clientele). A nonprofit organization is assumed to meet this test, unless the County demonstrates otherwise. Any payment in excess of \$1,000 must be supported with financial statements for the two 12-month periods prior to the acquisition. The amount to be used for the payment is the average of 2 years annual gross revenues less administrative expenses.
- e. Average annual net earnings of a business or farm operation. The average annual net earnings of a business or farm operation are one-half of its net earnings before Federal, State, and local income taxes during the 2 taxable years immediately prior to the taxable year in which it was displaced. If the business or farm was not in operation for the full 2 taxable years prior to displacement, net earnings shall be based on the actual period of operation at the displacement site during the 2 taxable years prior to displacement, projected to an annual rate. Average annual net earnings may be based upon a different period of time when the County determines it to be more equitable. Net earnings include any compensation obtained from the business or farm operation by its owner, the owner's spouse, and dependents. The displaced person shall furnish the County proof of net earnings through income tax returns, certified financial statements, or other reasonable evidence, which the County determines is satisfactory.

6. Discretionary Utility Relocation Payments

- a. Whenever a program or project undertaken by the County causes the relocation of a utility facility and the relocation of the facility creates extraordinary expenses for its owner, the County may, at its option, make a relocation payment to the owner for all or part of such expenses, if the following criteria are met:
- (i) The utility facility legally occupies State or local government property, or property over which the State or local government has an easement or right-of-way;

- (ii) The utility facility's right of occupancy thereon is pursuant to State law or local ordinance specifically authorizing such use, or where such use and occupancy has been granted through a franchise, use and occupancy permit, or other similar agreement;
 - (iii) Relocation of the utility facility is required by and is incidental to the primary purpose of the project or program undertaken by the County;
 - (iv) There is no Federal law, other than the Uniform Act, which clearly establishes a policy for the payment of utility moving costs that is applicable to the County's program or project; and
 - (v) State or local government reimbursement for utility moving costs or payment of such costs by the County is in accordance with State law.
- b. For the purposes of this section, the term extraordinary expenses means those expenses which, in the opinion of the County, are not routine or predictable expenses relating to the utility's occupancy of rights-of-way, and are not ordinarily budgeted as operating expenses, unless the owner of the utility facility has explicitly and knowingly agreed to bear such expenses as a condition for use of the property, or has voluntarily agreed to be responsible for such expenses.
- c. A relocation payment to a utility facility owner for moving costs under this section may not exceed the cost to functionally restore the service disrupted by the federally-assisted program or project, less any increase in value of the new facility and salvage value of the old facility. The County and the utility facility owner shall reach prior agreement on the nature of the utility relocation work to be accomplished, the eligibility of the work for reimbursement, the responsibilities for financing and accomplishing the work, and the method of accumulating costs and making payment.

E. REPLACEMENT HOUSING PAYMENTS

1. Replacement Housing Payment for 180-Day Homeowner-Occupants

- a. Eligibility. A displaced person is eligible for the replacement housing payment for a 180-day homeowner-occupant if the person:
- (i) Has actually owned and occupied the displacement dwelling for not less than 180 days immediately prior to the initiation of negotiations; and
 - (ii) Purchases and occupies a decent, safe, and sanitary replacement dwelling within one year after the later of the following dates (except that the County may extend such one year period for good cause):

- (A) The date the displaced person receives final payment for the displacement dwelling or, in the case of condemnation, the date the full amount of the estimate of just compensation is deposited in the court; or
 - (B) The date the County obligation is met.
- b. Amount of payment. The replacement housing payment for an eligible 180-day homeowner-occupant may not exceed \$22,500. The payment under this subpart is limited to the amount necessary to relocate to a comparable replacement dwelling within one year from the date the displaced homeowner-occupant is paid for the displacement dwelling, or the date a comparable replacement dwelling is made available to such person, whichever is later. The payment shall be the sum of:
 - (i) The amount by which the cost of a replacement dwelling exceeds the acquisition cost of the displacement dwelling, as determined in accordance with paragraph c of this section;
 - (ii) The increased interest costs and other debt service costs which are incurred in connection with the mortgage(s) on the replacement dwelling, as determined in accordance with paragraph d of this section; and
 - (iii) The reasonable expenses incidental to the purchase of the replacement dwelling, as determined in accordance with paragraph e of this section.
- c. Price differential.
 - (i) Basic computation. The price differential to be paid under paragraph b(i) of this section is the amount which must be added to the acquisition cost of the displacement dwelling and site to provide a total amount equal to the lesser of:
 - (A) The reasonable cost of a comparable replacement dwelling; or
 - (B) The purchase price of the decent, safe, and sanitary replacement dwelling actually purchased and occupied by the displaced person.
 - (ii) Owner retention of displacement dwelling. If the owner retains ownership of his or her dwelling, moves it from the displacement site, and reoccupies it on a replacement site, the purchase price of the replacement dwelling shall be the sum of:
 - (A) The cost of moving and restoring the dwelling to a condition comparable to that prior to the move;

- (B) The cost of making the unit a decent, safe, and sanitary replacement dwelling; and
 - (C) The current market value for residential use of the replacement dwelling site, unless the claimant rented the displacement site and there is a reasonable opportunity for the claimant to rent a suitable replacement site; and
 - (D) The retention value of the dwelling, if such retention value is reflected in the “acquisition cost” used when computing the replacement housing payment.
- d. Increased mortgage interest costs. The County shall determine the factors to be used in computing the amount to be paid to a displaced person under paragraph b(ii) of this section. The payment for increased mortgage interest cost shall be the amount which will reduce the mortgage balance on a new mortgage to an amount which could be amortized with the same monthly payment for principal and interest as that for the mortgage(s) on the displacement dwelling. In addition, payments shall include other debt service costs, if not paid as incidental costs, and shall be based only on bona fide mortgages that were valid liens on the displacement dwelling for at least 180 days prior to the initiation of negotiations. Paragraphs d(i) through d(v) of this section shall apply to the computation of the increased mortgage interest costs payment, which payment shall be contingent upon a mortgage being placed on the replacement dwelling.
 - (i) The payment shall be based on the unpaid mortgage balance(s) on the displacement dwelling; however, in the event the displaced person obtains a smaller mortgage than the mortgage balance(s) computed in the buydown determination, the payment will be prorated and reduced accordingly. In the case of a home equity loan the unpaid balance shall be that balance which existed 180 days prior to the initiation of negotiations or the balance on the date of acquisition, whichever is less.
 - (ii) The payment shall be based on the remaining term of the mortgage(s) on the displacement dwelling or the term of the new mortgage, whichever is shorter.
 - (iii) The interest rate on the new mortgage used in determining the amount of the payment shall not exceed the prevailing fixed interest rate for conventional mortgages currently charged by mortgage lending institutions in the area in which the replacement dwelling is located.
 - (iv) Purchaser’s points and loan origination or assumption fees, but not seller’s points, shall be paid to the extent:

- (A) They are not paid as incidental expenses;
 - (B) They do not exceed rates normal to similar real estate transactions in the area;
 - (C) The County determines them to be necessary; and
 - (D) The computation of such points and fees shall be based on the unpaid mortgage balance on the displacement dwelling, less the amount determined for the reduction of the mortgage balance under this section.
- (v) The displaced person shall be advised of the approximate amount of this payment and the conditions that must be met to receive the payment as soon as the facts relative to the person's current mortgage(s) are known and the payment shall be made available at or near the time of closing on the replacement dwelling in order to reduce the new mortgage as intended.
- e. Incidental expenses. The incidental expenses to be paid under paragraph b(iii) of this section are those necessary and reasonable costs actually incurred by the displaced person incident to the purchase of a replacement dwelling, and customarily paid by the buyer, including:
- (i) Legal, closing, and related costs, including those for title search, preparing conveyance instruments, notary fees, preparing surveys and plats, and recording fees.
 - (ii) Lender, FHA, or VA application and appraisal fees.
 - (iii) Loan origination or assumption fees that do not represent prepaid interest.
 - (iv) Professional home inspection, certification of structural soundness, and termite inspection.
 - (v) Credit report.
 - (vi) Owner's and mortgagee's evidence of title, e.g., title insurance, not to exceed the costs for a comparable replacement dwelling.
 - (vii) Escrow agent's fee.
 - (viii) State revenue or documentary stamps, sales or transfer taxes (not to exceed the costs for a comparable replacement dwelling).
 - (ix) Such other costs as the County determines to be incidental to the purchase.
- f. Rental assistance payment for 180-day homeowner. A 180-day homeowner-occupant, who could be eligible for a replacement housing payment under paragraph 1 of this section but elects to rent a replacement dwelling, is eligible for a rental assistance payment. The amount of the rental assistance payment

is based on a determination of market rent for the acquired dwelling compared to a comparable rental dwelling available on the market. Under no circumstances would the rental assistance payment exceed the amount that could have been received had the 180-day homeowner elected to purchase and occupy a comparable replacement dwelling.

2. Replacement Housing Payment for 90-Day Occupants

a. Eligibility. A tenant or owner-occupant displaced from a dwelling is entitled to a payment not to exceed \$5,250 for rental assistance, as computed in accordance with paragraph b of this section, or downpayment assistance, as computed in accordance with paragraph c of this section, if such displaced person:

- (i) Has actually and lawfully occupied the displacement dwelling for at least 90 days immediately prior to the initiation of negotiations; and
- (ii) Has rented, or purchased, and occupied a decent, safe, and sanitary replacement dwelling within 1 year (unless the County extends this period for good cause) after:

- (A) For a tenant, the date he or she moves from the displacement dwelling; or

- (B) For an owner-occupant, the later of:

- (AA) The date he or she receives final payment for the displacement dwelling, or in the case of condemnation, the date the full amount of the estimate of just compensation is deposited with the court; or

- (BB) The date he or she moves from the displacement dwelling.

b. Rental assistance payment.

- (i) Amount of payment. An eligible displaced person who rents a replacement dwelling is entitled to a payment not to exceed \$5,250 for rental assistance. Such payment shall be 42 times the amount obtained by subtracting the base monthly rental for the displacement dwelling from the lesser of:

- (A) The monthly rent and estimated average monthly cost of utilities for a comparable replacement dwelling; or

- (B) The monthly rent and estimated average monthly cost of utilities for the decent, safe, and sanitary replacement dwelling actually occupied by the displaced person.

- (ii) Base monthly rental for displacement dwelling. The base monthly rental for the displacement dwelling is the lesser of:
 - (A) The average monthly cost for rent and utilities at the displacement dwelling for a reasonable period prior to displacement, as determined by the County (for an owner-occupant, the County will use the fair market rent for the displacement dwelling. For a tenant who paid little or no rent for the displacement dwelling, the County will use the fair market rent, unless its use would result in a hardship because of the person's income or other circumstances);
 - (B) Thirty (30) percent of the displaced person's average monthly gross household income if the amount is classified as "low income" by the U.S. Department of Housing and Urban Development's Annual Survey of Income Limits for the Public Housing and Section 8 Programs. The base monthly rental shall be established solely on the criteria in paragraph b(ii)(A) of this section for persons with income exceeding the survey's "low income" limits, for persons refusing to provide appropriate evidence of income, and for persons who are dependents. A full time student or resident of an institution may be assumed to be a dependent, unless the person demonstrates otherwise; or,
 - (C) The total of the amounts designated for shelter and utilities if the displaced person is receiving a welfare assistance payment from a program that designates the amounts for shelter and utilities.
- (iii) Manner of disbursement. A rental assistance payment may, at the County's discretion, be disbursed in either a lump sum or in installments. However, the full amount vests immediately, whether or not there is any later change in the person's income or rent, or in the condition or location of the person's housing.
- c. Downpayment assistance payment
 - (i) Amount of payment. An eligible displaced person who purchases a replacement dwelling is entitled to a downpayment assistance payment in the amount the person would receive under paragraph 2 of this section if the person rented a comparable replacement dwelling. At the County's discretion, a downpayment assistance payment that is less than \$5,250 may be increased to any amount not to exceed \$5,250. However, the payment to a displaced homeowner shall not exceed the amount the owner would receive if he or she met the 180-day occupancy requirement. If the County elects to

provide the maximum payment of \$5,250 as a downpayment, the County will apply this discretion in a uniform and consistent manner, so that eligible displaced persons in like circumstances are treated equally. A displaced person eligible to receive a payment as a 180-day owner-occupant is not eligible for this payment.

- (ii) Application of payment. The full amount of the replacement housing payment for downpayment assistance must be applied to the purchase price of the replacement dwelling and related incidental expenses.

3. Replacement Housing Payments for Persons Displaced by Community Development Block Grant (CDBG) Funded Programs or Projects

- a. Relocation benefits will be provided for all low or moderate income persons who occupied housing demolished or converted to a use other than for low or moderate income housing by a program or project assisted with CDBG funds, including:
 - (i) Compensation sufficient to ensure that, for a 5-year period, the displaced families shall not bear, after relocation, a ratio of shelter costs to income that exceeds 30 percent; or
 - (ii) If elected by a family, a lump-sum payment equal to the capitalized value of the benefits available under paragraph (i) above to permit the household to secure participation in a housing cooperative or mutual housing association; and
- b. Persons displaced will be relocated into comparable replacement housing that is—
 - (i) Decent, safe and sanitary;
 - (ii) Adequate in size to accommodate the occupants;
 - (iii) Functionally equivalent; and
 - (iv) In an area not subject to unreasonably adverse environmental conditions.
- c. Persons displaced will have the right to elect, as an alternative to the benefits under this section, to receive benefits under the Uniform Act if such persons determine that it is in their best interest to do so; and
- d. Where the County denies a claim for assistance under this section, the claimant may appeal to the Secretary of Housing and Urban Development (the Secretary) and the decision of the Secretary will be final unless a court determines the decision was arbitrary and capricious.

4. Additional Rules Governing Replacement Housing Payments

- a. Determining cost of comparable replacement dwelling. The upper limit of a replacement housing payment shall be based on the cost of a comparable replacement dwelling.
 - (i) If available, at least three comparable replacement dwellings shall be examined and the payment computed on the basis of the dwelling most nearly representative of, and equal to, or better than, the displacement dwelling.
 - (ii) If the site of the comparable replacement dwelling lacks a major exterior attribute of the displacement dwelling site, (e.g., the site is significantly smaller or does not contain a swimming pool), the value of such attribute shall be subtracted from the acquisition cost of the displacement dwelling for purposes of computing the payment.
 - (iii) If the acquisition of a portion of a typical residential property causes the displacement of the owner from the dwelling and the remainder is a buildable residential lot, the County may offer to purchase the entire property. If the owner refuses to sell the remainder to the County, the market value of the remainder may be added to the acquisition cost of the displacement dwelling for purposes of computing the replacement housing payment.
 - (iv) To the extent feasible, comparable replacement dwellings shall be selected from the neighborhood in which the displacement dwelling was located or, if that is not possible, in nearby or similar neighborhoods where housing costs are generally the same or higher.
 - (v) Multiple occupants of one displacement dwelling. If two or more occupants of the displacement dwelling move to separate replacement dwellings, each occupant is entitled to a reasonable prorated share, as determined by the County, of any relocation payments that would have been made if the occupants moved together to a comparable replacement dwelling. However, if the County determines that two or more occupants maintained separate households within the same dwelling, such occupants have separate entitlements to relocation payments.
 - (vi) Deductions from relocation payments. The County will deduct the amount of any advance relocation payment from the relocation payment(s) to which a displaced person is otherwise entitled. The County will not withhold any part of a relocation payment to a displaced person to satisfy an obligation to any other creditor.

- (vii) Mixed-use and multifamily properties. If the displacement dwelling was part of a property that contained another dwelling unit and/or space used for nonresidential purposes, and/or is located on a lot larger than typical for residential purposes, only that portion of the acquisition payment which is actually attributable to the displacement dwelling will be considered the acquisition cost when computing the replacement housing payment.
- b. Inspection of replacement dwelling. Before making a replacement housing payment or releasing the initial payment from escrow, the County or its designated representative will inspect the replacement dwelling and determine whether it is a decent, safe, and sanitary dwelling.
- c. Purchase of replacement dwelling. A displaced person is considered to have met the requirement to purchase a replacement dwelling, if the person:
 - (i) Purchases a dwelling;
 - (ii) Purchases and rehabilitates a substandard dwelling;
 - (iii) Relocates a dwelling which he or she owns or purchases;
 - (iv) Constructs a dwelling on a site he or she owns or purchases;
 - (v) Contracts for the purchase or construction of a dwelling on a site provided by a builder or on a site the person owns or purchases; or
 - (vi) Currently owns a previously purchased dwelling and site, valuation of which shall be on the basis of current market value.
- d. Occupancy requirements for displacement or replacement dwelling. No person shall be denied eligibility for a replacement housing payment solely because the person is unable to meet the occupancy requirements set forth herein for a reason beyond his or her control, including:
 - (i) A disaster, an emergency, or an imminent threat to the public health or welfare, as determined by the President, the Federal Agency funding the project, or the County; or
 - (ii) Another reason, such as a delay in the construction of the replacement dwelling, military duty, or hospital stay, as determined by the County.
- e. Conversion of payment. A displaced person who initially rents a replacement dwelling and receives a rental assistance payment is eligible to receive a replacement housing payment if he or she meets the eligibility criteria for such payments, including purchase and occupancy within the prescribed 1-year period. Any portion of the rental assistance payment that has been disbursed shall be deducted from the replacement housing payment computed.

- f. Payment after death. A replacement housing payment is personal to the displaced person and upon his or her death the undisbursed portion of any such payment shall not be paid to the heirs or assigns, except that:
 - (i) The amount attributable to the displaced person's period of actual occupancy of the replacement housing shall be paid.
 - (ii) Any remaining payment shall be disbursed to the remaining family members of the displaced household in any case in which a member of a displaced family dies.
 - (iii) Any portion of a replacement housing payment necessary to satisfy the legal obligation of an estate in connection with the selection of a replacement dwelling by or on behalf of a deceased person shall be disbursed to the estate.
- g. Insurance proceeds. To the extent necessary to avoid duplicate compensation, the amount of any insurance proceeds received by a person in connection with a loss to the displacement dwelling due to a catastrophic occurrence (fire, flood, etc.) shall be included in the acquisition cost of the displacement dwelling when computing the price differential.

5. Replacement Housing of Last Resort

- a. Determination to provide replacement housing of last resort. Whenever a program or project cannot proceed on a timely basis because comparable replacement dwellings are not available within the monetary limits for owners or tenants, the County shall provide additional or alternative assistance under the provisions of this subpart. Any decision to provide last resort housing assistance must be adequately justified either:
 - (i) On a case-by-case basis, for good cause, which means that appropriate consideration has been given to:
 - (A) The availability of comparable replacement housing in the program or project area;
 - (B) The resources available to provide comparable replacement housing; and
 - (C) The individual circumstances of the displaced person, or
 - (ii) By a determination that:
 - (A) There is little, if any, comparable replacement housing available to displaced persons within an entire program or project area; and, therefore, last resort housing assistance is necessary for the area as a whole;
 - (B) A program or project cannot be advanced to completion in a timely manner without last resort housing assistance; and

- (C) The method selected for providing last resort housing assistance is cost effective, considering all elements, which contribute to total program or project costs.
- b. Basic rights of persons to be displaced. Notwithstanding any provision of this subpart, no person shall be required to move from a displacement dwelling unless comparable replacement housing is available to such person. No person may be deprived of any rights the person may have under the Uniform Act or the Uniform Act Regulations. The County will not require any displaced person to accept a dwelling provided by the County under these procedures (unless the County and the displaced person have entered into a contract to do so) in lieu of any acquisition payment or any relocation payment for which the person may otherwise be eligible.
- c. Methods of providing comparable replacement housing. The County will have broad latitude in implementing this subpart, but implementation shall be for reasonable cost, on a case-by-case basis unless an exception to case-by-case analysis is justified for an entire project.
 - (i) The methods of providing replacement housing of last resort include, but are not limited to:
 - (A) A replacement housing payment in excess of the limits. A replacement housing payment under this section may be provided in installments or in a lump sum at the County's discretion.
 - (B) Rehabilitation of and/or additions to an existing replacement dwelling.
 - (C) The construction of a new replacement dwelling.
 - (D) The provision of a direct loan, which requires regular amortization or deferred repayment. The loan may be unsecured or secured by the real property. The loan may bear interest or be interest-free.
 - (E) The relocation and, if necessary, rehabilitation of a dwelling.
 - (F) The purchase of land and/or a replacement dwelling by the County and subsequent sale or lease to, or exchange with a displaced person.
 - (G) The removal of barriers for persons with disabilities.
 - (i) Under special circumstances, consistent with the definition of a comparable replacement dwelling, modified methods of providing replacement housing of last resort permit consideration of replacement housing based on space and physical characteristics different from those in the displacement dwelling, including

upgraded, but smaller replacement housing that is decent, safe, and sanitary and adequate to accommodate individuals or families displaced from marginal or substandard housing with probable functional obsolescence. In no event, however, shall a displaced person be required to move into a dwelling that is not functionally equivalent.

- (ii) The County will provide assistance under this subpart to a displaced person who is not eligible to receive a replacement housing payment because of failure to meet the length of occupancy requirement when comparable replacement rental housing is not available at rental rates within the displaced person's financial means. Such assistance shall cover a period of 42 months.

F. MOBILE HOMES

1. Applicability

- a. General. This subpart describes the requirements governing the provision of replacement housing payments to a person displaced from a mobile home and/or mobile home site who meets the basic eligibility requirements of the Uniform Act Regulations. Except as modified by this subpart, such a displaced person is entitled to a moving expense payment in accordance with Section D herein and a replacement housing payment in accordance with Section E herein to the same extent and subject to the same requirements as persons displaced from conventional dwellings. Moving cost payments to persons occupying mobile homes are covered in Section D(1)(f)(i) through D(1)(f)(x).
- b. Partial acquisition of mobile home park. The acquisition of a portion of a mobile home park property may leave a remaining part of the property that is not adequate to continue the operation of the park. If the County determines that a mobile home located in the remaining part of the property must be moved as a direct result of the project, the occupant of the mobile home shall be considered to be a displaced person who is entitled to relocation payments and other assistance under the Uniform Act Regulations.

2. Replacement Housing Payment for 180-Day Mobile Homeowner Displaced from a Mobile Home, and/or from the Acquired Mobile Home Site

- a. Eligibility. An owner-occupant displaced from a mobile home or site is entitled to a replacement housing payment, not to exceed \$22,500 if:
 - (i) The person occupied the mobile home on the displacement site for at least 180 days immediately before:
 - (A) The initiation of negotiations to acquire the mobile home, if the person owned the mobile home and the mobile home is real property;

- (B) The initiation of negotiations to acquire the mobile home site if the mobile home is personal property, but the person owns the mobile home site; or
 - (C) The date of the County's written notification to the owner-occupant that the owner is determined to be displaced from the mobile.
 - (ii) The person meets the other basic eligibility requirements at Section E(1)(a)(ii); and
 - (iii) The County acquires the mobile home as real estate, or acquires the mobile home site from the displaced owner, or the mobile home is personal property but the owner is displaced from the mobile home because the County determines that the mobile home:
 - (A) Is not, and cannot economically be made decent, safe, and sanitary;
 - (B) Cannot be relocated without substantial damage or unreasonable cost;
 - (C) Cannot be relocated because there is no available comparable replacement site; or
 - (D) Cannot be relocated because it does not meet mobile home park entrance requirements.
- b. Replacement housing payment computation for a 180-day owner that is displaced from a mobile home. The replacement housing payment for an eligible displaced 180-day owner is computed as follows, as applicable:
 - (i) If the Agency acquires the mobile home as real estate and/or acquires the owned site, the acquisition cost used to compute the price differential payment is the actual amount paid to the owner as just compensation for the acquisition of the mobile home, and/or site, if owned by the displaced mobile homeowner.
 - (ii) If the Agency does not purchase the mobile home as real estate but the owner is determined to be displaced from the mobile home and eligible for a replacement housing payment, the eligible price differential payment for the purchase of a comparable replacement mobile home, is the lesser of the displaced mobile homeowner's net cost to purchase a replacement mobile home (i.e., purchase price of the replacement mobile home less trade-in or sale proceeds of the displacement mobile home); or, the cost of the County's selected comparable mobile home less the County's estimate of the salvage or trade-in value for the mobile home from which the person is displaced.

- (iii) If a comparable replacement mobile home site is not available, the price differential payment shall be computed on the basis of the reasonable cost of a conventional comparable replacement dwelling.
- c. Rental assistance payment for a 180-day owner-occupant that is displaced from a leased or rented mobile home site. If the displacement mobile home site is leased or rented, a displaced 180-day owner-occupant is entitled to a rental assistance payment computed as described in Section E(2)(b). This rental assistance payment may be used to lease a replacement site; may be applied to the purchase price of a replacement site; or may be applied, with any replacement housing payment attributable to the mobile home, to the purchase of a replacement mobile home or conventional decent, safe and sanitary dwelling.
- d. Owner-occupant not displaced from the mobile home. If the County determines that a mobile home is personal property and may be relocated to a comparable replacement site, but the owner-occupant elects not to do so, the owner is not entitled to a replacement housing payment for the purchase of a replacement mobile home. However, the owner is eligible for moving costs described at Section D and any replacement housing payment for the purchase or rental of a comparable site as described in this paragraph 2 or in paragraph 3 below.

3. Replacement Housing Payment for 90-Day Mobile Home Occupants

A displaced tenant or owner-occupant of a mobile home and/or site is eligible for a replacement housing payment, not to exceed \$5,250 if:

- a. The person actually occupied the displacement mobile home on the displacement site for at least 90 days immediately prior to the initiation of negotiations;
- b. The person meets the other basic eligibility requirements at Section E(1); and
- c. The County acquires the mobile home and/or mobile home site, or the mobile home is not acquired by the County but the County determines that the occupant is displaced from the mobile home because of one of the circumstances described at Section F(2).

G. DEFINITIONS

Comparable Replacement Dwelling. The requirement that a comparable replacement dwelling be “functionally equivalent” to the displacement dwelling means that it must perform the same function, and provide the same utility. While it need not possess every feature of the displacement dwelling, the principal features must be present. For example, if the displacement dwelling contains a pantry and a similar dwelling is not available, a replacement dwelling with ample kitchen cupboards may be acceptable. Insulated and heated space in a garage might prove an adequate substitute for basement workshop

space. A dining area may substitute for a separate dining room. Under some circumstances, attic space could substitute for basement space for storage purposes, and vice versa. Only in unusual circumstances may a comparable replacement dwelling contain fewer rooms or, consequentially, less living space than the displacement dwelling. Such may be the case when a decent, safe, and sanitary replacement dwelling (which by definition is “adequate to accommodate” the displaced person) may be found to be “functionally equivalent” to a larger but very run-down substandard displacement dwelling. Another example is when a displaced person accepts an offer of government housing assistance and the applicable requirements of such housing assistance program require that the displaced person occupy a dwelling that has fewer rooms or less living space than the displacement dwelling. The definition of comparable replacement dwelling requires that a comparable replacement dwelling for a person who is not receiving assistance under any government housing program before displacement must be currently available on the private market without any subsidy under a government housing program. A public housing unit may qualify as a comparable replacement dwelling only for a person displaced from a public housing unit. A privately owned dwelling with a housing program subsidy tied to the unit may qualify as a comparable replacement dwelling only for a person displaced from a similarly subsidized unit or public housing. A housing program subsidy that is paid to a person (not tied to the building), such as a HUD Section 8 Housing Voucher Program, may be reflected in an offer of a comparable replacement dwelling to a person receiving a similar subsidy or occupying a privately owned subsidized unit or public housing unit before displacement. However, nothing in this part prohibits the County from offering, or precludes a person from accepting, assistance under a government housing program, even if the person did not receive similar assistance before displacement. However, the County is obligated to inform the person of his or her options under this part. (If a person accepts assistance under a government housing assistance program, the rules of that program governing the size of the dwelling apply, and the rental assistance payment under ___ would be computed on the basis of the person’s actual out-of-pocket cost for the replacement housing.)

Decent, Safe and Sanitary. Many local housing and occupancy codes require the abatement of deteriorating paint, including lead-based paint and lead-based paint dust, in protecting the public health and safety. Where such standards exist, they must be honored. Even where local law does not mandate adherence to such standards, they will be considered as a matter of public policy.

Dwelling Site. This definition ensures that the computation of replacement housing payments are accurate and realistic (a) when the dwelling is located on a larger than normal site, (b) when mixed use properties are acquired, (c) when more than one dwelling is located on the acquired property, or (d) when the replacement dwelling is retained by an owner and moved to another site.

Household Income (exclusions). Household income for purposes of this policy does not include program benefits that are not considered income by Federal law such as food stamps and the Women Infants and Children (WIC) program.

Initiation of Negotiations (Tenants). Tenants who occupy property that may be acquired amicably, without recourse to the use of the power of eminent domain, must be fully informed as to their eligibility for relocation assistance. This includes notifying such tenants of their potential eligibility when negotiations are initiated, notifying them if they become fully eligible, and, in the event the purchase of the property will not occur, notifying them that they are no longer eligible for relocation benefits. If a tenant is not readily accessible, as the result of a disaster or emergency, the County will make a good faith effort to provide these notifications and document its efforts in writing.

Mobile Home. The following examples provide additional guidance on the types of mobile homes and manufactured housing that can be found acceptable as comparable replacement dwellings for persons displaced from mobile homes. A recreational vehicle that is capable of providing living accommodations may be considered a replacement dwelling if the following criteria are met: the recreational vehicle is purchased and occupied as the “primary” place of residence; it is located on a purchased or leased site and connected to or have available all necessary utilities for functioning as a housing unit on the date of the County’s inspection; and, the dwelling, as sited, meets all local, State, and Federal requirements for a decent, safe and sanitary dwelling. (The regulations of some local jurisdictions will not permit the consideration of these vehicles as decent, safe and sanitary dwellings. In those cases, the recreational vehicle will not qualify as a replacement dwelling.) For HUD programs, mobile home is defined as “a structure, transportable in one or more sections, which, in the traveling mode, is eight body feet or more in width or forty body feet or more in length, or, when erected on site, is three hundred or more square feet, and which is built on a permanent chassis and designed to be used as a dwelling with or without a permanent foundation when connected to the required utilities and includes the plumbing, heating, air-conditioning, and electrical systems contained therein; except that such terms shall include any structure which meets all the requirements of this paragraph except the size requirements and with respect to which the manufacturer voluntarily files a certification required by the Secretary of HUD and complies with the standards established under the National Manufactured Housing Construction and Safety Standards Act, provided by Congress in the original 1974 Manufactured Housing Act.” In 1979 the term “mobile home” was changed to “manufactured home.” For purposes of this policy, the terms mobile home and manufactured home are synonymous. When assembled, manufactured homes built after 1976 contain no less than 320 square feet. They may be single or multi-sectioned units when installed. Their designation as personalty or realty will be determined by State law. When determined to be realty, most are eligible for conventional mortgage financing. The 1976 HUD standards distinguish manufactured homes from factory-built “modular homes” as well as conventional or “stick-built” homes. Both of these types of housing are required to meet State and local construction codes.

Persons not Displaced. There are circumstances where the acquisition, rehabilitation or demolition of real property takes place without the intent or necessity that an occupant of the property be permanently displaced. Because such occupants are not considered

“displaced persons” under this part, great care will be exercised to ensure that they are treated fairly and equitably. For example, if the tenant occupant of a dwelling will not be displaced, but is required to relocate temporarily in connection with the project, the temporarily occupied housing must be decent, safe, and sanitary and the tenant will be reimbursed for all reasonable out-of-pocket expenses incurred in connection with the temporary relocation. These expenses may include moving expenses and increased housing costs during the temporary relocation. Temporary relocation will not extend beyond one year before the person is returned to his or her previous unit or location. The County will contact any residential tenant who has been temporarily relocated for a period beyond one year and offer all permanent relocation assistance. This assistance would be in addition to any assistance the person has already received for temporary relocation, and will not be reduced by the amount of any temporary relocation assistance. Similarly, if a business will be shut-down for any length of time due to rehabilitation of a site, it may be temporarily relocated and reimbursed for all reasonable out of pocket expenses or must be determined to be displaced at the County’s option. Any person who disagrees with the County’s determination that he or she is not a displaced person under this part may file an appeal.

Persons with a Disability. Reasonable accommodation of a displaced person with a disability at the replacement dwelling means the County is required to address persons with a physical impairment that substantially limits one or more of the major life activities. In these situations, reasonable accommodation will include the following at a minimum: doors of adequate width; ramps or other assistance devices to traverse stairs and access bathtubs, shower stalls, toilets and sinks; storage cabinets, vanities, sink and mirrors at appropriate heights. Kitchen accommodations will include sinks and storage cabinets built at appropriate heights for access. The County will also consider other items that may be necessary, such as physical modification to a unit, based on the displaced person’s needs.

AN AFFIRMATIVE ACTION EQUAL OPPORTUNITY EMPLOYER



MARK A. KERN, Chairman
St. Clair County Board
Intergovernmental Grants Department
#19 Public Square, Suite 200
Belleville, IL 62220
www.co.st-clair.il.us

(618) 277-6790
(618) 236-1190 (fax)
ENGLISH
(800)-526-0844—TTY/ITRC
(800) 526-0857—voice/ITRC
SPANISH
(800)-501-0864 –TTY/ITRC
(800)-501-0865 –voice/ITRC