



ST. LOUIS
HOUSING
AUTHORITY

BOARD OF COMMISSIONERS

REGULAR MEETING

JUNE 27

2024





TO THE COMMISSIONERS OF THE ST. LOUIS HOUSING AUTHORITY
ST. LOUIS, MISSOURI

PUBLIC NOTICE OF MEETING

Take notice that the **regular meeting** of the commissioners of the St. Louis Housing Authority will be held via **Zoom*** on Thursday, June 27, 2024, commencing at 4:30 p.m., to consider and act upon items shown on the attached agenda. An Executive Session may be convened to discuss legal actions, causes of actions, communications with attorneys, personnel matters, leasing, purchase or sale of real estate and bid specifications.

DATED: June 21, 2024

ST. LOUIS HOUSING AUTHORITY

Attachment

***Instructions For Joining Zoom**

Meeting ID: 939 278 0715

Via Smart Phone or Computer:

<https://bit.ly/41J3uLI>

Via Phone:

1-312-626-6799

Meeting ID: 939 278 0715

Passcode:536879

BOARD OF COMMISSIONERS, ST. LOUIS HOUSING AUTHORITY
REGULAR MEETING, JUNE 27, 2024, 4:30 P.M.
ST. LOUIS HOUSING AUTHORITY, 3520 PAGE BOULEVARD
ST. LOUIS, MISSOURI 63106
AGENDA

ROLL CALL

CONSENT AGENDA

1. Approval of Minutes, Regular Meeting, May 23, 2024

RESIDENTS' COMMENTS ON AGENDA ITEMS

ITEMS FOR INDIVIDUAL CONSIDERATION

2. **Resolution No. 3007**
Approving and Authorizing the St. Louis Housing Authority Capital Fund Five-Year Plan and the FFY 2024 Capital Fund Annual Statement
3. **Resolution No. 3008**
Approving and Authorizing the Submission of the Agency Plan Annual Submission for Fiscal Year 2024
4. **Resolution No. 3009**
Authorizing and Approving Revisions to the St. Louis Housing Authority's Admissions and Continued Occupancy Policy (ACOP)
5. **Resolution No. 3010**
Authorizing and Approving the Allowances for Tenant-Furnished Utilities and Other Services for the Public Housing Program
6. **Resolution No. 3011**
Authorizing and Approving the Flat Rent Schedule for the Public Housing Program
7. **Resolution No. 3012**
Authorizing and Approving the St. Louis Housing Authority to Submit a Section 18 Disposition Application for Hodiamont Apartments

CHAIRMAN'S REPORT

DIRECTOR'S REPORT

RESIDENTS' CONCERNS

COMMISSIONERS' CONCERNS

SPEAKERS TO ADDRESS THE BOARD

EXECUTIVE SESSION

The Executive Session may be convened pursuant to Section 610.021 of the Missouri Revised Statutes, to discuss legal actions, causes of actions or litigation, personnel matters relating to the hiring, firing, disciplining and promoting of employees, negotiations with our employees, leasing, purchase or sale of real estate and specifications for competitive bidding.

ADJOURNMENT

Please note that this is not a public hearing or forum. Anyone wishing to address the Board must follow the St. Louis Housing Authority's Speaker's Policy. (Contact the Executive Division at Central Office for a copy of the policy.)

**APPROVAL OF MINUTES
MAY 23, 2024**

BOARD OF COMMISSIONERS
ST. LOUIS HOUSING AUTHORITY
REGULAR MEETING
MAY 23, 2024
4:30 p.m.

CALL TO ORDER

The Board of Commissioners of the St. Louis Housing Authority held a Regular Meeting via Zoom on Thursday, May 23, 2024. Chairman Sal Martinez called the meeting to order at approximately 4:43 p.m.

Present: Annetta Booth
Margaret English
Regina Fowler
Benita Jones
Sal Martinez

Absent: Constantino Ochoa, Jr. (excused)
Shelby Watson

CONSENT AGENDA

Approval of Minutes

Commissioner Fowler moved to approve the minutes of April 23, 2024. Commissioner Jones seconded the motion. The motion passed with Commissioners English, Fowler, Jones and Martinez voting aye.

ITEMS FOR INDIVIDUAL CONSIDERATION

Resolution No. 3005

Authorizing and Approving an Amended Trespass/Bar and Ban Policy for the St. Louis Housing Authority.

Presenting Resolution No. 3005, Latasha Barnes, Acting Executive Director, stated that the over past several months, the St. Louis Housing Authority's (SLHA) Asset Management Department, under the leadership of Paul Werner, Director of Operations for Public Housing, had been working to revise SLHA's Trespass/Bar and Ban Policy following feedback received from residents, the property management staff, the St. Louis Metropolitan Police Department's Housing Unit and other community stakeholders. She noted that the proposed policy includes a number of important updates designed to minimize administrative burdens, enhance operational efficiencies, and minimize disruptions at SLHA developments by bad actors. She said once approved, the Asset Management Department plans to host several training sessions for the property management staff at both SLHA and the mixed-finance sites. She stated that Mr. Werner was available to answer any specific questions and/or address any concerns regarding the amended policy.

Commissioner Fowler asked if the ban will be for all SLHA properties or just the property that the person was on.

Mr. Werner stated that it would depend on what is requested, but typically the ban would be for an individual property, although there are a couple of clusters; for example, if someone is banned from Renaissance, they would be banned from Renaissance and Renaissance Senior, or somebody banned from Clinton-Peabody would be banned from Clinton-Peabody and the Fox Grove properties.

Commissioner Fowler asked if the individual could potentially get put back on the waiting list or go to another property and then be the same problem.

Mr. Werner stated that this policy only applies to non-residents. He said if the person is a guest of a resident, then the resident will get a notification that somebody associated with them was put on the list and if they continue to welcome that guest back, they could potentially get a lease violation.

Commissioner Fowler stated that her concern was about a resident being banned. She asked how would that be handled.

Mr. Werner stated that if a resident commits an offense to be banned, they would be in violation of their lease and would get a lease violation notice.

Commissioner Martinez asked if there were any additional questions and/or comments regarding Resolution No. 3005.

There were none.

Commissioner Fowler moved to approve Resolution No. 3005. Commissioner Jones seconded the motion. The motion passed with all commissioners voting aye.

Resolution No. 3006

Approving and Authorizing the St. Louis Housing Authority to Execute a Street Vacation Request with the City of St. Louis Department of Streets.

Presenting Resolution No. 3006, Ms. Barnes stated that as a part of SLHA's Clinton-Peabody redevelopment effort, the development team, under the leadership of Jason Hensley, Director of Real Estate Development, has been engaged in regular meetings with the residents to reimagine Clinton-Peabody. She said as a part of the planning process, the new design plan created with the residents requires that a portion of LaSalle, specifically between Dillon Court and St. Ange Avenue, be moved south to better align with the existing street grid. Therefore, board approval was being requested to submit the required street vacation request to the City of St. Louis for consideration. She noted that Mr. Hensley was available to answer any specific questions and/or address concerns.

Commissioner Jones asked for more details about the street vacation request.

Mr. Hensley stated that the map attached to the resolution shows the section of LaSalle that the redevelopment plan would like to move to align with the area to the east and the area to the west. He said the Streets Department's process requires board approval for Ms. Barnes to sign the street vacation request. He noted that the street would be vacated by the City of St. Louis who owns it, and they will essentially transfer responsibility to the Clinton-Peabody development team, and when the road is replaced, SLHA will give the street back to the City of St. Louis.

Commissioner Martinez asked if there were any additional questions and/or comments regarding Resolution No. 3006.

There were none.

Commissioner Fowler moved to approve Resolution No. 3006. Commissioner Booth seconded the motion. The motion passed with all commissioners voting aye.

CHAIRMAN'S REPORT

Commissioner Martinez stated that the executive director hiring panel has been very active in the process of identifying a new full-time executive director for SLHA. He commended the hiring panel for their hard work and noted that he completed one-on-one interviews with the three finalists. He said they were all outstanding and he would be reporting back to the hiring panel on his reflection of those interviews. He stated that afterwards, they would reconvene and decide who they want to make an offer to.

DIRECTOR'S REPORT

Presenting some of the agency highlights, Ms. Barnes stated that SLHA is still in the process of completing its 2024 Agency Plan. She noted that the draft plan is available online and is still within its 45-day comment period. She said SLHA has been actively soliciting feedback from SLHA families and community stakeholders. She noted that the plan was presented to the City-Wide TAB on May 15, 2024 and a virtual

town hall meeting was held on May 22, 2024 to collect feedback from the community at-large. She said the comment period will end with a public hearing on June 17, 2024 and everyone is welcome to participate in that process.

Ms. Barnes stated that SLHA underwent an audit of its Voucher Management System April 16-18, 2024 by HUD and no findings were identified thanks to the hard work of the Finance Department under the leadership of Bridgette Harvey and the Housing Choice Voucher Department under the leadership of Carla Matthews. She said this audit was important because the data that is housed in the Voucher Management System is what HUD uses to fund and distribute resources to support SLHA's Housing Choice Voucher program. She noted that the report was received back from HUD on May 22, 2024, but some corrections need to be made. She said once the corrections are made, the full report will be shared with the board.

Ms. Barnes stated that SLHA was awarded 100 new Tenant Protection Vouchers in an effort to preserve housing for families at Paul Brown Lofts who are currently at risk of homelessness. She noted that SLHA also got a HUD waiver to apply more flexible payment standards under PIH Notice 2023-29. She said through both of these efforts, SLHA will be able to assist more families in need.

Ms. Barnes stated that SLHA opened its public housing waitlist April 23-29, 2024 for select units at several developments. She noted that over 3,400 online applications and approximately 200 paper applications were received during that period of time and SLHA had over 600 interested applicants to show up at the office. She congratulated the Asset Management Department for their hard work and for their effort in leading the initiative. Ms. Barnes stated that as of April 30, 2024 there were a little over 25,000 individuals on SLHA's public housing waitlist. She said there is a lot of work to be done and SLHA's Property Management Department is working hard to make units available for families in need.

Ms. Barnes stated that SLHA, in partnership with its master developer, POAH, is continuing the work to advance its redevelopment efforts at Clinton Peabody. She said they are engaging with stakeholders and actively collecting data in support of their Choice Neighborhood grant application. She shared that SLHA and POAH submitted a joint request to Congress on April 26, 2024 for an additional \$3 million in Community Project Funding. She said these funds, if awarded, will be important in launching the first phase of the redevelopment effort, allowing SLHA to replace current distressed apartments with approximately 89 new, high-quality and sustainable affordable homes.

Updating the board on some recent grants and funding requests submitted on behalf of the agency, Ms. Barnes stated that SLHA submitted a funding request to HUD on April 17, 2024 for additional administrative fees in response to a recent PIH Notice. She said if awarded, SLHA will be able to use these funds to house more veterans and have more funding to support the day-to-day operational activities as it pertains to SLHA's Veterans Affairs Supportive Housing program, as well as roll out new supportive activities designed to help those families have the best housing opportunities.

Ms. Barnes stated that SLHA also submitted a joint grant request in partnership with Better Family Life to Regions Bank for additional funds to help support Section 8 families who are interested in homeownership opportunities. She said under this particular grant, it would fund up to 30 families to receive credit repair or financial planning services to help in their rental journey and ultimately in their homeownership and self-sufficiency journey.

Ms. Barnes stated that SLHA also applied for a Youth Violence Prevention grant to the St. Louis Area Violence Prevention Commission in partnership with the LaSalle Park residents. She noted that a resident meeting was held at LaSalle Park and the residents worked with staff and team members to brainstorm around ways to build a stronger sense of community and to engage the young people in hopes to reduce some of the violence seen at the development. She said SLHA took the ideas and put them in a grant application for submission. She said if awarded, SLHA will have additional funds to provide more

community-based activities for the young people there. Ms. Barnes stated that SLHA is looking to host a youth festival at LaSalle Park whereby it can create an inclusive and safe environment, and SLHA is looking forward to partnering with the neighboring homeowners in that area through planning efforts, if awarded the funds.

Ms. Barnes stated that SLHA's Development and Modernization team submitted an application for security enhancements at California Gardens. She said SLHA had already been working to enhance security at California Gardens and had been working on fence replacements, new entryways, and an access control system, but through the Emergency Safety and Security Grant funds, if awarded, SLHA will be able to install a new security camera system throughout the complex, which is believed will make the development safer, enhance the security and minimize some of the existing crime that is spilling over into the community.

Concluding her report, Ms. Barnes deferred to Officer Kelly from the St. Louis Metropolitan Police Department (SLMPD) to address the board.

Officer Kelly stated that she did not have anything to share at the moment.

Commissioner Booth recalled that a report was not given by the police department at the last meeting and she noted that this was the second consecutive month without a report. She said it is imperative that the board have a report from SLMPD.

Commissioners Martinez and Fowler concurred, and Commissioner Martinez asked if there was an explanation as to why a report was not available.

Officer Kelly stated that she was filling in at the last minute and did not have anything prepared. She said if given a chance, she would prepare a report and email it.

Commissioner Martinez recalled SLHA recently having a meeting with representatives of SLMPD about the relationship SLHA has with SLMPD. He said perhaps SLHA needs to reach back out to SLMPD because the board does not want this to happen again, as SLHA has an expectation due to its long-term relationship with SLMPD that reports would be given at all of its meetings.

Ms. Barnes stated that she would reach out to SLMPD and copy Commissioner Martinez on the correspondence.

Commissioner Martinez asked if there were any additional questions and/or comments regarding the Director's Report.

There were none.

ADJOURNMENT

Commissioner Booth moved to adjourn the meeting. Commissioner Fowler seconded the motion. The vote was in favor of passing the motion with all commissioners voting aye. The meeting thereupon adjourned at 5:06 p.m.

Sal Martinez, Chairman
Board of Commissioners
St. Louis Housing Authority

Latasha Barnes, Acting Secretary
Board of Commissioners
St. Louis Housing Authority

(SEAL)

RESOLUTION No. 3007

MEMORANDUM

To: Board of Commissioners

Through: Latasha K. Barnes, Acting Executive Director

From: Jason W. Hensley, Director of Real Estate Development

Date: June 12, 2024

Subject: Resolution No. 3007
Approving and Authorizing the St. Louis Housing Authority Capital Fund Five-Year Plan and the FFY 2024 Capital Fund Annual Statement

In 2013, HUD published the Capital Fund Final rule, which decoupled the Capital Fund Submissions from the Agency Plan. The rule requires housing authorities to develop a separate Capital Fund submission. Housing authorities are required to hold a public hearing, consult with the tenant affairs board (TAB) and submit any comments received from these hearings and the consultations for the Capital Fund submission. HUD guidance suggests that this process be held concurrent with the Agency Plan process.

The St. Louis Housing Authority (SLHA) prepared a revised Capital Fund Five-Year Plan in conjunction with the 2024-2028 Agency Five-Year Plan and Annual Plan. SLHA provided a 45-day comment period and conducted a public hearing on June 17, 2024. The Capital Fund Five-Year Plan was available to residents and the St. Louis TAB (City-Wide TAB) prior to the hearing. The comments to the Capital Fund Five-Year Plan and the responses are attached.

In addition, HUD revised the process for accepting annual Capital Fund grants. The ACC amendments are now deemed executed when the first funds are drawn from the grant. Board approval of individual ACC amendments is no longer required. Additionally, HUD no longer provides Replacement Housing Factor Capital Fund grants. SLHA was notified on May 21, 2024 that its FFY 2024 Capital Fund allocation is \$9,227,900. SLHA completed the FFY 2024 Capital Fund Annual Statement in accordance with the latest approved Capital Fund Five-Year Plan.

A Physical Needs Assessment (PNA) has been finalized and accepted by SLHA and the data has been used to realign the capital fund for the five-year 2024-2028 planning period.

Board approval of the SLHA Capital Fund Five-Year Plan, FFY 2024 Capital Fund Annual Statement and the definition of a significant amendment or modification to the plan are requested. All supporting documents are attached.

**Approving and Authorizing the St. Louis Housing Authority Capital Fund Five-Year Plan
and the FFY 2024 Capital Fund Annual Statement**

WHEREAS, the St. Louis Housing Authority (SLHA) has prepared the Capital Fund Five-Year Plan and the FFY 2024 Capital Fund Annual Statement in accordance with 24 CFR § 903.7(g) and the guidance provided by HUD; and

WHEREAS, SLHA has worked in collaboration with the St. Louis Tenant Affairs Board and conducted planning meetings to obtain comments on the proposed Capital Fund Five-Year Plan and FFY 2024 Capital Fund Annual Statement; and

WHEREAS, SLHA has published notices and made the proposed Capital Fund Five-Year Plan and FFY 2024 Capital Fund Annual Statement available for inspection and public comment for a period of 45 days prior to the Public Hearing; and

WHEREAS, SLHA has developed a definition of a significant amendment or modification to the plan regarding the proposed Capital Fund Five-Year Plan; and

WHEREAS, SLHA conducted a Public Hearing on June 17, 2024 to obtain public comments regarding the proposed Capital Fund Five-Year Plan; and

WHEREAS, SLHA has considered all comments and recommendations received and has incorporated all relevant changes in the proposed Capital Fund Five-Year Plan.

NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF COMMISSIONERS OF THE ST. LOUIS HOUSING AUTHORITY THAT:

1. The Acting Executive Director of the St. Louis Housing Authority is authorized and directed to take all actions necessary to obtain HUD approval and implement the Capital Fund Five-Year Plan and the FFY 2024 Capital Fund.

**AGENCY PLAN FY 2024
CAPITAL FUND BUDGETS**

Capital Fund Program
Form HUD-50075.2

**Five Year Action Plan
FY 2024 - FY 2028**

Capital Fund Program—Five-Year Action Plan

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
Expires 8/30/2011

PHA Name/Number		Locality: (City/County & State)			Revision No:		
St. Louis Housing Authority		St. Louis, MO					
A. Development Number/Name	Work Stmt. for Year 1 2024	Work Statement for Year 2 FFY: 2025	Work Statement for Year 3 FFY: 2026	Work Statement for Year 4 FFY: 2027	Work Statement for Year 5 FFY: 2028		
MO001000002 Clinton-Peabody	See Annual Statement						
MO001000010 James House							
MO001000013 Euclid Plaza						\$1,991,064	
MO001000017 West Pine			\$2,000,000	\$1,141,450	\$70,955	\$250,000	
MO001000019 Parkview				\$52,440	\$250,000		
MO001000028 Badenfest						\$199,588	
MO001000028 Badenhaus						\$400,000	
MO001000034 LaSalle Park							
MO001000037 Cochran Plaza					\$50,934	\$225,000	
MO001000038 Armand & Ohio				\$31,395			
MO001000038 California Gardens						\$500,000	
MO001000038 Folsom			\$115,581	\$136,069			
MO001000038 Lafayette Apartments				\$72,086	\$18,478		
MO001000038 Lafayette Townhomes			\$34,500		\$218,500		
MO001000038 Marie Fanger			\$58,783				
MO001000038 South Broadway			\$71,071				
MO001000038 Tiffany Turnkey			\$5,686		\$717,247		
MO001000038 Walnut Park			\$89,712		\$76,245		
MO001000041 Cupples							
MO001000041 Hodiamont							
MO001000041 Lookaway						\$150,000	
MO001000041 McMillan Manor					\$44,281		
MO001000041 McMillan Manor II			\$58,650		\$24,840		
MO001000041 Page Manor			\$51,290		\$176,768		
MO001000041 Samuel Shepard				\$640,491	\$175,260		
MO001000052 King Louis III			\$474,720				
PHA Wide Unit Repairs		\$1,213,867	\$2,154,155	\$2,790,631	\$937,154		
B. Physical Improvements Subtotal		\$3,699,140	\$4,702,806	\$4,614,139	\$4,652,806		
C. Management Improvements							
D. HA-Wide Nondwelling Structures and Equipment		\$0	\$0	\$0	\$0		
E. Administration		\$831,201	\$831,201	\$831,201	\$831,201		
F. Other		\$581,316	\$620,000	\$708,667	\$670,000		
G. Operations		\$2,078,002	\$2,078,002	\$2,078,002	\$2,078,002		
H. Demolition		\$0	\$0	\$0	\$0		
I. Development		\$80,000	\$80,000	\$80,000	\$80,000		
J. Capital Fund Financing - Debt Service		\$1,042,350	\$0	\$0	\$0		
K. Total CGP Funds		\$8,312,009	\$8,312,009	\$8,312,009	\$8,312,009		
L. Total Non-CGP Funds		\$0	\$0	\$0	\$0		
M. Grand Total		\$8,312,009	\$8,312,009	\$8,312,009	\$8,312,009		

Signature of Executive Director and Date:

Signature of Public Housing Director/Office of Native American Programs Administrator and Date:

X

X

\$0

Five Year Action Plan
Part II: Supporting Pages
 Physical Needs Work Statement(s)
 Capital Fund Program (CFP)

U. S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 Expires 4/30/2011

Work Statement for Year 1 2024	Work Statement for Year 2 FFY: 2025			Work Statement for Year 3 FFY: 2026			
	Development Number/Name/General Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name/General Description of Major Work Categories	Quantity	Estimated Cost	
See Annual Atatement	MO001000017 West Pine Plumbing System Supply & Sanitary Replacements		\$2,000,000.00	MO001000017 West Pine Diesel Generator Replacement, Automatic Transfer Switch Replacement, & Exterior Lighting Fixture Replacements		\$141,450.00	
	MO001000038 Folsom Exterior Door Replacements, Interior Painting, Electrical Panel Replacements		\$115,581.00	MO001000017 West Pine Capital Elevator Replacement		\$1,000,000.00	
	MO001000038 Lafayette Townhomes Exterior Painting		\$34,500.00	MO001000019 Parkview Elderly Exterior Lighting Replacements		\$52,440.00	
	MO001000038 Marie Fanger Window Replacements, Roofing Repairs, Parking Lot Reseal & Exterior Lighting Replacements		\$58,783.00	MO001000038 Armand & Ohio Window Replacements		\$31,395.00	
	MO001000038 South Broadway Window Replacements & Exterior Painting		\$71,071.00	MO001000038 Folsom Exterior Painting, Window Replacements, Roofing Replacement, Interior Renovations, & Exterior Lighting Replacements		\$136,069.00	
	MO001000038 Tiffany Turnkey Water Heater Replacements		\$5,686.00	MO001000038 Lafayette Apartments Security Upgrades and Replacements		\$72,086.00	
	MO001000038 Walnut Park Flooring Replacement		\$89,712.00	MO001000041 Samuel Shepard Interior & Exterior Painting		\$14,950.00	
	MO001000041 McMillan Manor II Exterior Lighting Fixture Replacements		\$58,650.00	MO001000041 Samuel Shepard Interior Painting, Exhaust Fans, & Lighting Fixture Upgrades		\$55,821.00	
	MO001000041 Page Manor Water Heater Replacements		\$51,290.00	MO001000041 Samuel Shepard Window Replacements		\$95,000.00	
	PHA Wide Unit Repairs		\$1,213,867.00	MO001000041 Samuel Shepard Condensing Unit/Heat Pump Replacements		\$474,720.00	
				MO001000052 King Louis III Exterior Painting, Roofing Replacment, Gutter & Downspout Replacement, Solar Panel Replacement, Playground & Exterior Lighting Replacements		\$474,720.00	
				PHA Wide Unit Repairs		\$2,154,155.00	
		Subtotal of Estimated Cost		\$3,699,140.00	Subtotal of Estimated Cost		\$4,702,806.00

Five Year Action Plan
Part III: Supporting Pages
 Management Needs Work Statement(s)
 Capital Fund Program (CFP)

U. S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 Expires 4/30/2011

Work Statement for Year 1 2024	Work Statement for Year 2 FFY: 2025			Work Statement for Year 3 FFY: 2026			
	Development Number/Name/General Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name/General Description of Major Work Categories	Quantity	Estimated Cost	
See Annual Statement	Management Improvement	1 Year	\$0.00	Management Improvement	1 Year	\$0.00	
	TOTAL		\$0.00	TOTAL		\$0.00	
	Other:	1 Year		Other:	1 Year		
	Fees & Cost		\$500,000.00	Fees & Cost		\$500,000.00	
	Dwelling Equipment		\$11,316.00	Dwelling Equipment		\$50,000.00	
	Non-Dwelling Equipment		\$0.00	Non-Dwelling Equipment		\$0.00	
	Relocation		\$70,000.00	Relocation		\$70,000.00	
	Debt Service		\$1,042,350.00	Debt Service		\$0.00	
	TOTAL		\$1,623,666.00	TOTAL		\$620,000.00	
	Operations	1 Year		Operations	1 Year		
Adequacy and Efficacy Operations and Development security		\$2,078,002.25	Adequacy and Efficacy Operations and Development security		\$2,078,002.25		
TOTAL		\$2,078,002.25	TOTAL		\$2,078,002.25		
Subtotal of Estimated Cost			\$3,701,668.25	Subtotal of Estimated Cost			\$2,698,002.25

Five Year Action Plan
Part III: Supporting Pages
 Management Needs Work Statement(s)
 Capital Fund Program (CFP)

U. S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 Expires 4/30/2011

Work Statement for Year 1 2024	Work Statement for Year 4 FFY: 2027			Work Statement for Year 5 FFY: 2028			
	Development Number/Name/General Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name/General Description of Major Work Categories	Quantity	Estimated Cost	
See Annual Statement	Management Improvement	1 Year	\$0.00	Management Improvement	1 Year	\$0.00	
	TOTAL		\$0.00	TOTAL		\$0.00	
	Other:			Other:			
	Fees & Cost	1 Year	\$500,000.00	Fees & Cost	1 Year	\$500,000.00	
	Dwelling Equipment		\$138,667.00	Dwelling Equipment		\$100,000.00	
	Non-Dwelling Equipment		\$0.00	Non-Dwelling Equipment		\$0.00	
	Relocation		\$70,000.00	Relocation		\$70,000.00	
	Debt Service		\$0.00	Debt Service		\$0.00	
	TOTAL		\$708,667.00	TOTAL		\$670,000.00	
	Operations	1 Year		Operations	1 Year		
Adequacy and Efficacy Operations and Development security		\$2,078,002.25	Adequacy and Efficacy Operations and Development security		\$2,078,002.25		
TOTAL		\$2,078,002.25	TOTAL		\$2,078,002.25		
Subtotal of Estimated Cost			\$2,786,669.25	Subtotal of Estimated Cost			\$2,748,002.25

ANNUAL STATEMENT FOR FY 2024
CFP: MO36P00150124

Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0157
 Expires 11/30/2023

“Public reporting burden for this collection of information is estimated to average 2.2 hours. This includes the time for collecting, reviewing, and reporting the data. The information requested is required to obtain a benefit. This form is used to verify allowable and reasonableness of grant expenses. There are no assurances of confidentiality. HUD may not conduct or sponsor, and an applicant is not required to respond to a collection of information unless it displays a currently valid OMB control number.

PHA Name	Grant Type and Number Capital Fund Program Grant No: Replacement Housing Factor Grant No: Date of CFFP:	FFY of Grant: FFY of Grant Approval:
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- Type of Grant
- Original Annual Statement
 Reserve for Disasters/Emergencies
 Revised Annual Statement (revision no:
- Performance and Evaluation Report for Period Ending:
 Final Performance and Evaluation Report

Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹	
		Original	Revised ²	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 15) ³				
3	1408 Management Improvements				
4	1410 Administration (may not exceed 10% of line 15)				
5	1480 General Capital Activity				
6	1492 Moving to Work Demonstration				
7	1501 Collateralization Expense / Debt Service Paid by PHA				
8	1503 RAD-CFP				
9	1504 RAD Investment Activity				
10	1505 RAD-CPT				
11	9000 Debt Reserves				
12	9001 Bond Debt Obligation paid Via System of Direct Payment				
13	9002 Loan Debt Obligation paid Via System of Direct Payment				
14	9900 Post Audit Adjustment				

¹ To be completed for the Performance and Evaluation Report.
² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
³ PHAs with under 250 units in management may use 100% of CFP Grants for operations.

Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0157
 Expires 11/30/2023

Part I: Summary					
PHA Name:		Grant Type and Number Capital Fund Program Grant No: Replacement Housing Factor Grant No: Date of CFFP:		FFY of Grant: FFY of Grant Approval:	
Type of Grant <input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no: <input type="checkbox"/> Performance and Evaluation Report for Period Ending: <input type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹	
		Original	Revised ²	Obligated	Expended
15	Amount of Annual Grant:: (sum of lines 2 - 14)				
16	Amount of line 15 Related to LBP Activities				
17	Amount of line 15 Related Sect. 504, ADA, and Fair Housing Act Activities.				
18	Amount of line 15 Related to Security - Soft Costs				
19	Amount of line 15 Related to Security - Hard Costs				
20	Amount of line 15 Related to Energy Conservation Measures				
Signature of Executive Director *		Date		Signature of Public Housing Director	
				Date	

* I certify that the information provided on this form and in any accompanying documentation is true and accurate. I acknowledge that making, presenting, or submitting a false, fictitious, or fraudulent statement, representation, or certification may result in criminal, civil, and/or administrative sanctions, including fines, penalties, and imprisonment.

¹ To be completed for the Performance and Evaluation Report.

² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

³ PHAs with under 250 units in management may use 100% of CFP Grants for operations.

Part II: Supporting Pages								
PHA Name:			Grant Type and Number Capital Fund Program Grant No: CFFP (Yes/ No): Replacement Housing Factor Grant No:			Federal FFY of Grant:		
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised ¹	Funds Obligated ²	Funds Expended ²	

¹ To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
² To be completed for the Performance and Evaluation Report.

Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0157
 Expires 11/30/2023

Part II: Supporting Pages								
PHA Name:			Grant Type and Number Capital Fund Program Grant No: CFFP (Yes/ No): Replacement Housing Factor Grant No:			Federal FFY of Grant:		
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised ¹	Funds Obligated ²	Funds Expended ²	

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Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0157
 Expires 11/30/2023

Part III: Implementation Schedule for Capital Fund Financing Program					
PHA Name:					Federal FFY of Grant:
Development Number Name/PHA-Wide Activities	All Fund Obligated (Quarter Ending Date)		All Funds Expended (Quarter Ending Date)		Reasons for Revised Target Dates ¹
	Original Obligation End Date	Actual Obligation End Date	Original Expenditure End Date	Actual Expenditure End Date	

¹ Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.

Part III: Implementation Schedule for Capital Fund Financing Program					
PHA Name:					Federal FFY of Grant:
Development Number Name/PHA-Wide Activities	All Fund Obligated (Quarter Ending Date)		All Funds Expended (Quarter Ending Date)		Reasons for Revised Target Dates ¹
	Original Obligation End Date	Actual Obligation End Date	Original Expenditure End Date	Actual Expenditure End Date	

¹ Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.

**STATEMENT DEFINING
SIGNIFICANT AMENDMENT OR
MODIFICATION TO THE CAPITAL
FUND FIVE-YEAR PLAN**



Statement Defining Significant Amendment or Modification to the Capital Fund Five-Year Plan

The St. Louis Housing will amend or modify its Capital Fund Five-Year Plan upon the occurrence of any of the following events:

- A proposed demolition, disposition, homeownership, Capital Fund Financing, development, or mixed-finance proposal that is not incorporated in an approved Agency Plan.
- A federal statutory or regulatory change is made effective and, in the opinion of the St. Louis Housing Authority, has either a substantial programmatic or financial effect on the Capital Fund program.

St. Louis Housing Authority (SLHA)
Public Hearing Comments and Responses
Capital Fund Program FY 2024

The St. Louis Housing Authority issued the proposed Agency Plan for public comments on May 3, 2024 for a 45-day comment period. Speakers' comments were formally recorded at the Public Hearing held on June 17, 2024. A summary of the comments and the Agency's responses to the comments are listed below.

COMMENTS TO THE CAPITAL FUND PROGRAM - 5 YEAR ACTION PLAN:

On May 22, 2024, Mr. Jason W. Hensley, Director of Real Estate Development of St. Louis Housing Authority (SLHA), provided the FY 2024 Annual Statement incorporating the funding SLHA received in its 2024 ACC Amendment. The comment and response are as follows:

Comment #1:

The St. Louis Housing Authority's (SLHA) draft Five-Year Capital Fund Program budgets presented for public comment on May 3, 2024 did not contain the Annual Statement for FY 2024 because SLHA had not received notification from HUD of its Capital Fund Program grant award. SLHA was notified on May 21, 2024 of its FFY 2024 Capital Fund allocation in the amount of \$9,227,900 and completed the FFY 2024 Capital Fund Annual Statement in accordance with the latest approved Capital Fund Five-Year Plan.

SLHA Response:

The Annual Statement has been incorporated into the Agency Plan as proposed.

RESOLUTION No. 3008



MEMORANDUM

To: Board of Commissioners

From: Latasha K. Barnes, Acting Executive Director

Date: June 12, 2024

Subject: Resolution No. 3008
Approving and Authorizing the Submission of the Agency Plan Annual Submission for Fiscal Year 2024

Board approval is requested to authorize the St. Louis Housing Authority to submit the Agency Plan Annual Submission for fiscal year 2024.

The St. Louis Housing Authority has prepared the Agency Plan Annual Plan Submission in accordance with the regulations and requirements of 24 CFR 903.

Resident planning meetings were conducted to encourage meaningful participation in the planning and development process of the annual submission.

The proposed Agency Plan Annual Submission includes the following exhibits for your review:

1. Comments and Response Summary from Public Hearing
 - Comments and Responses to Agency Plan Section C.1
2. Flyers for the Town Hall Meeting and Public Hearing
3. Certification of Compliance
4. Civil Rights Certification
5. Certification by State or Local Official of PHA Plans Consistency with the Consolidated Plan or State Consolidated Plan

**Approving and Authorizing the Submission of the Agency Plan
Annual Submission for Fiscal Year 2024**

WHEREAS, the St. Louis Housing Authority (SLHA) desires to submit the Agency Plan Annual Submission for fiscal year 2024; and

WHEREAS, the Agency Plan Annual Submission has been prepared in accordance with 24 CFR Part 903 regulations and requirements for submission to HUD; and

WHEREAS, SLHA has worked in collaboration with the St. Louis Tenant Affairs Board and conducted planning meetings to obtain recommendations in the development of the proposed Annual Submission; and

WHEREAS, SLHA has published notices and made the proposed Agency Plan Annual Submission available for inspection and public comment for a period of 45 days prior to the Public Hearing; and

WHEREAS, SLHA has obtained certification from local government officials that the proposed Agency Plan Annual Submission is consistent with the jurisdiction consolidated plan; and

WHEREAS, SLHA conducted a Public Hearing on June 17, 2024 to obtain public comments regarding the proposed Annual Submission; and

WHEREAS, SLHA has considered all comments and recommendations received, and has incorporated all relevant changes in the proposed Agency Plan Annual Submission.

NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF COMMISSIONERS OF THE ST. LOUIS HOUSING AUTHORITY THAT:

1. The Acting Executive Director of the St. Louis Housing Authority is authorized and directed to submit the Agency Plan Annual Submission for fiscal year 2024 to the U.S. Department of Housing and Urban Development.

Public Hearing Comments and Responses

St. Louis Housing Authority
Public Hearing Comments and Responses
Annual Plan FFY 2024

The St. Louis Housing Authority (SLHA) issued the proposed Agency Plan for public comments on May 3, 2024 for a 45-day comment period. On June 17, 2024, the Public Hearing was held. There were no attendees besides the SLHA staff. SLHA received four (4) written comments.

I. COMMENTS TO THE AGENCY PLAN:

On May 22, 2024, Mr. Jason W. Hensley, Director of Real Estate Development of St. Louis Housing Authority (SLHA), provided the FY 2024 Annual Statement incorporating the funding SLHA received in its 2024 ACC Amendment. The comment was as follows:

Comment #1:

The St. Louis Housing Authority's (SLHA) draft Five-Year Capital Fund Program budgets presented for public comment on May 3, 2024 did not contain the Annual Statement for FY 2024 because SLHA had not received notification from HUD of its Capital Fund Program grant award. SLHA was notified on May 21, 2024 of its FFY 2024 Capital Fund allocation in the amount of \$9,227,900 and completed the FFY 2024 Capital Fund Annual Statement in accordance with the latest approved Capital Fund Five-Year Plan.

SLHA Response:

The Annual Statement has been incorporated into the Agency Plan as proposed.

Comment #2:

Attachment B.2 (f) – Project-based Vouchers contained an error in the total number of units. Instead of 517 units under contract, the St. Louis Housing Authority has 519 units under contract.

SLHA Response:

Attachment B.2 (f) – Project-based Vouchers has been updated to reflect the correct number of project-based units.

Comment #3:

Since the Plan was issued for comments, the St. Louis Housing Authority received notification of its Capital Fund Program grant award; therefore, Attachment #4 – Section B.1 (b) – Financial Resources was revised to incorporate the Public Housing Capital Fund grant allocation, which was not included when the draft Plan was issued for public comments on May 3, 2024.

SLHA Response:

Attachment #4 – Section B.1 (b) – Financial Resources has been revised to reflect the Capital Fund grant allocation in the amount of \$9,227,900 and incorporated in the Agency Plan.

Comment #4:

On June 12, 2024, Paul Werner, Director of Operations for Public Housing, incorporated additional language into Chapter 22 of the ACOP matrix. Specifically, 22.1 Lease Terminations and 22.1.2.1 Mandatory Termination to be consistent with the HUD FAQ published in January 2022.

Additionally, Chapter 6, Tenant Selection, was modified to add a point value for victims of domestic violence under Section 6.6, Order of Selection. When the draft plan was published, a number value had not been determined.

Reference ACOP Matrix/Attachment #3C of the Agency Plan.

SLHA Response:

A revised ACOP matrix has been inserted in Attachment #3C, Changes to Admissions and Continued Occupancy Policy – ACOP, to incorporate all changes.

Comment #5:

On June 17, 2024, at the Public Hearing, representatives from Legal Services of Eastern Missouri (LSEM) presented a letter to address a concern about the St. Louis Housing Authority (SLHA) moving to biennial inspections. While LSEM overall supports the proposed changes to SLHA’s Agency Plan, they suggested and encouraged SLHA to set a threshold score for inspections; properties scoring above that mark can be scheduled for biennial inspections, but those scoring below that mark must have annual inspections until they can improve their properties.

SLHA Response:

The St. Louis Housing Authority will take Legal Services of Eastern Missouri’s suggestion under advisement.

II. COMMENTS TO THE ADMISSIONS AND CONTINUED OCCUPANCY POLCY:

Refer to Comment #4.

III. COMMENTS TO THE UTILITY ALLOWANCE SCHEDULE

No comments were received during the 45-day comment period.

IV. COMMENTS TO THE FLAT RENT SCHEDULE

No comments were received during the 45-day comment period.

V. COMMENTS TO THE CAPITAL FUND FIVE-YEAR ACTION PLAN

No comments were received during the 45-day comment period.

COMMENT TO THE FY 2024 AGENCY PLAN
COMMENT #1
(FY 2024 Annual Statement)

Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0157
 Expires 11/30/2023

“Public reporting burden for this collection of information is estimated to average 2.2 hours. This includes the time for collecting, reviewing, and reporting the data. The information requested is required to obtain a benefit. This form is used to verify allowable and reasonableness of grant expenses. There are no assurances of confidentiality. HUD may not conduct or sponsor, and an applicant is not required to respond to a collection of information unless it displays a currently valid OMB control number.

PHA Name St. Louis Housing Authority	Grant Type and Number Capital Fund Program Grant No: MO36P00150124 Replacement Housing Factor Grant No: Date of CFFP:	FFY of Grant: FFY of Grant Approval: 2024
--	---	--

- Type of Grant
- Original Annual Statement
 Reserve for Disasters/Emergencies
 Revised Annual Statement (revision no:
- Performance and Evaluation Report for Period Ending:
 Final Performance and Evaluation Report

Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹	
		Original	Revised ²	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 15) ³	\$2,306,975.00			
3	1408 Management Improvements				
4	1410 Administration (may not exceed 10% of line 15)	\$922,790.00			
5	1480 General Capital Activity	\$4,950,330.00			
6	1492 Moving to Work Demonstration				
7	1501 Collateralization Expense / Debt Service Paid by PHA				
8	1503 RAD-CFP				
9	1504 RAD Investment Activity				
10	1505 RAD-CPT				
11	9000 Debt Reserves				
12	9001 Bond Debt Obligation paid Via System of Direct Payment	\$1,047,805.00			
13	9002 Loan Debt Obligation paid Via System of Direct Payment				
14	9900 Post Audit Adjustment				

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³ PHAs with under 250 units in management may use 100% of CFP Grants for operations.

Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0157
 Expires 11/30/2023

Part I: Summary					
PHA Name: St. Louis Housing Authority	Grant Type and Number MO36P00150124 Capital Fund Program Grant No: Replacement Housing Factor Grant No: Date of CFFP:	FFY of Grant: FFY of Grant Approval: 2024			
Type of Grant <input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no: <input type="checkbox"/> Performance and Evaluation Report for Period Ending: <input type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹	
		Original	Revised ²	Obligated	Expended
15	Amount of Annual Grant:: (sum of lines 2 - 14)	\$9,227,900.00			
16	Amount of line 15 Related to LBP Activities				
17	Amount of line 15 Related Sect. 504, ADA, and Fair Housing Act Activities.				
18	Amount of line 15 Related to Security - Soft Costs				
19	Amount of line 15 Related to Security - Hard Costs				
20	Amount of line 15 Related to Energy Conservation Measures				
Signature of Executive Director *		Date	Signature of Public Housing Director		Date

* I certify that the information provided on this form and in any accompanying documentation is true and accurate. I acknowledge that making, presenting, or submitting a false, fictitious, or fraudulent statement, representation, or certification may result in criminal, civil, and/or administrative sanctions, including fines, penalties, and imprisonment.

¹ To be completed for the Performance and Evaluation Report.

² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

³ PHAs with under 250 units in management may use 100% of CFP Grants for operations.

Part II: Supporting Pages								
PHA Name: St. Louis Housing Authority			Grant Type and Number Capital Fund Program Grant MO36P00150124 No: CFFP (Yes/ No): Replacement Housing Factor Grant No:			Federal FFY of Grant: 2024		
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised ¹	Funds Obligated ²	Funds Expended ²	
MO001000002 Clinton Peabody	Redevelopment Planning and Execution			\$300,000.00				
MO001000010 James House	Building Automation System/HVAC Control Systems Upgrade			\$299,934.00				
MO001000038 California Gardens	Furnace Replacements			\$86,940.00				
MO001000038 Folsom	HVAC Split System Replacements			\$20,700.00				
MO001000038 Marie Fanger	Electrical Panel Upgrades, HVAC Split System Replacements							
	Bathroom Exhaust Fan Replacements			\$134,605.00				
MO001000038 South Broadway	Exterior Door Replacements & HVAC Split System Replacements			\$81,672.00				
MO001000038 Tiffany Turnkey	Lighting Replacements			\$123,190.00				
MO001000038 Walnut Park	HVAC Split System Replacements			\$34,040.00				
MO001000041 McMillan Manor	Interior & Exterior Painting			\$39,634.00				
MO001000041 McMillan Manor II	Replace Roofing & Exterior Lighting above 20'			\$80,017.00				
MO001000041 Page Manor	Replace Roofing			\$24,000.00				
MO001000041 Samuel Shepard	Replace Wood Decking			\$12,765.00				
(Continued Next Page)								

¹ To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

² To be completed for the Performance and Evaluation Report.

Part III: Implementation Schedule for Capital Fund Financing Program					
PHA Name: St. Louis Housing Authority					Federal FFY of Grant: 2024
Development Number Name/PHA-Wide Activities	All Fund Obligated (Quarter Ending Date)		All Funds Expended (Quarter Ending Date)		Reasons for Revised Target Dates ¹
	Original Obligation End Date	Actual Obligation End Date	Original Expenditure End Date	Actual Expenditure End Date	
N/A	N/A	N/A	N/A	N/A	N/A

¹ Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.

COMMENT TO THE FY 2024 AGENCY PLAN
COMMENT #2
(Attachment B.2 (f) – Project-Based Vouchers)

B.2 (f)	Mainstream Voucher program	SLHA receives vouchers from HUD to assist near elderly and/or disabled families.		Allocated 87	Leased 26
B.2 (f)	Special Purpose: Housing Choice Voucher Program (VASH) voucher	SLHA continues to receive referrals from the Veteran's Administration for a Special-purpose voucher program under the Veterans Affairs Supportive Housing (VASH) program.		Allocated 253	Leased 245
B.2 (f)	Special Purpose: Emergency Housing Voucher	SLHA receives vouchers from HUD in order to assist individuals and families that are homeless or at risk of being homeless, fleeing, or attempting to flee, domestic violence.		Allocated 161	Leased 150
B.2 (f)	Project-based Vouchers	SLHA has 519 Project-based units. SLHA will be issuing an RFP to increase the number of project-based vouchers in SLHAs Housing Choice Voucher program.	Approved:	23rd Street Elderly, L.P. (Sullivan Place East)* 25th Street Elderly, L.P. (Sullivan Place West)* Blumeyer Elderly, L.P. (Sr. Living at Renaissance) Blumeyer II Associates (The Gardens @ Renaissance) Cambridge Seniors, L.P. Carr Square Tenant Corp. FP-San Remo Develop., L.P. Grand South Senior, L.P. Hammond Apartments, L.P. Homer G. Phillips, Hist JVL Renaissance I, L.P. JVL Renaissance II, L.P. K-M Housing, LLC Railton Residence, L.P. Salvation Army STL Garrison Residence, L.P. (VASH) Salvation Army STL Garrison Residence, L.P. Vaughn Elderly, L.P. (Cahill House) Water Tower Place, L.P.	74 65 30 8 36 77 0 81 28 48 0 0 0 25 18 3 26 0
				Total:	519
B.2 (f)	Special Purpose: Tenant Protection Voucher (TPV) program	SLHA receives Tenant Protection Vouchers (TPV) from HUD for special purposes			Leased 138

COMMENT TO THE FY 2024 AGENCY PLAN
COMMENT #3
(Attachment #4 – Section B.1 (b) – Financial Resources)

St. Louis Housing Authority

FY 2024 Annual Plan

ATTACHMENT #4

Section B.1 (c) – PHA Plan Update – Plan Elements Revised

Item 3 – Financial Resources

Financial Resources: Planned Sources and Uses		
Sources	Planned \$	Planned Uses
1. Federal Grants (FFY 2024 grants)		
a) Public Housing Operating Fund	13,194,817	PHA Operations
b) Public Housing Capital Fund Grant	9,227,900	Capital Improvements
c) Housing Choice Voucher/VASH Program	51,530,094	Housing Assistance Payments and Administrative Fees
d) MS5-Mainstream 5 Voucher Program	286,468	Housing Assistance Payments
e) EHV-Emergency Housing Voucher	1,786,346	Housing Assistance Payments
f) Resident Opportunity and Self-Sufficiency Grants (ROSS)	157,378	FFS Coordinator for Public Housing & S8 Program
Other Federal Grants (list below)		
2. Prior Year Federal Grants (unobligated funds only) (list below)		<i>As of 3/31/24</i>
FFY 2017-MO36R00150217	898,605	Replacement Housing
FFY 2019-MO36P00150119	590,262	Capital Improvements
FFY 2020-MO36P00150120	525,101	Capital Improvements
FFY 2021-MO36P00150121	533,401	Capital Improvements
FFY 2022-MO36P00150122	3,633,340	Capital Improvements
FFY 2023-MO36P00150123	6,101,356	Capital Improvements
FFY 2023-MO36E00150123	250,000	Capital Improvements
FFY 2022-MO36H00150122	520,300	Capital Improvements
ROSS 2015-MO001DOJ017A015	5,159	Juvenile Reentry Assistance
ROSS 2023-ROSS231786	375,512	ROSS Service Coordinator
ROSS 2023-ROSS23MO5220	58,639	FSS Coordinator
3. Public Housing Dwelling Rental Income	2,680,100	PHA Operations
4. Other income (list below)		
Interest on Investments	2,025	PHA Operations
Interest on Investments/Fraud Recovery	0	Housing Assistance
Other (Dividends/Insurance Proceeds)	186,835	PHA Operations
Other (Charges to Residents)	238,895	PHA Operations
5. Non-federal sources (list below)		
Interest on Investments	75,000	
Other (Space Rentals)	86,269	
Total resources	84,110,652	

COMMENT TO THE FY 2024 AGENCY PLAN

COMMENT #4

(Attachment #3C – Changes to Admissions and Continued Occupancy
Policy - ACOP)

Admissions and Continued Occupancy Policy (ACOP) Changes/Additions 2024

Chapter	Current	Change/Addition/Comment
<p>Chater 4 Program Administration</p> <p>4.5 Record Keeping</p> <p>4.5.4 Privacy Act Requirements</p>	<p>Applicants and residents, including all adults in the household, are required to sign a consent form, HUD-9886, Authorization for Release of Information.</p>	<p>Applicants and residents, including all adults in the household, are required to sign a consent form, HUD-9886-A, Authorization for Release of Information.</p>
<p>Chapter 6 Tenant Selection</p> <p>6.5 Waiting List Preferences</p>	<p>SLHA has established a preference system for admission to its public housing program. SLHA uses the following local preference system:</p> <ul style="list-style-type: none"> • Employed, elderly or disabled • Enrolled in or recently graduated from a job training or educational program • Homeless • Veteran 	<p>SLHA has established a preference system for admission to its public housing program. SLHA uses the following local preference system:</p> <ul style="list-style-type: none"> • Employed, elderly or disabled • Enrolled in or recently graduated from a job training or educational program • Homeless • Veteran • Victims of Domestic Violence
<p>Chapter 6 Tenant Selection</p> <p>6.5 Waiting List Preferences</p> <p>6.5.1 Employed, Elderly, Disabled, Veteran or Homeless Preference</p>	<p>Employed, Elderly, Disabled, Veteran or Homeless Preference</p>	<p><u>***Revise Section numbering to create three subsections. No other changes to this section</u></p> <p>6.5.1 Employed, Elderly, Disabled, Preference</p> <p>6.5.2 Veteran Prefrence</p> <p>6.5.3 Homeless Preference</p>

Admissions and Continued Occupancy Policy (ACOP) Changes/Additions 2024

<p>Chapter 6 Tenant Selection</p> <p>6.5 Waiting List Preferences</p> <p>6.5.4 Victims of Domestic Violence Preference</p>		<p>***ADD NEW SECTION/PREFERENCE</p> <p>Victims of Domestic Violence Preference</p> <p>To qualify for this preference, an applicant must present evidence that the family has been displaced as a result of fleeing violence in the home. Families are also eligible for this preference if there is proof that the family is currently living in a situation where they are being subjected to or victimized by violence in the home. Suitable evidence can be provided from law enforcement officials or social service agencies that have adequate knowledge of the family's living situation</p>
<p>Chapter 6 Tenant Selection</p> <p>6.6 Order of Selection</p>	<p>Pt. Value Assigned - Criteria</p> <p>20 - Employed, Elderly or Disabled</p> <p>15 - Enrolled in or recently graduated from a job training or educational program</p> <p>5 - Homeless</p> <p>5 - A veteran</p>	<p>Pt. Value Assigned - Criteria</p> <p>20 - Employed, Elderly or Disabled</p> <p>15 - Enrolled in or recently graduated from a job training or educational program</p> <p>5 - Homeless</p> <p>5 - A veteran</p> <p>10 – Victims of domestic violence</p>
<p>Chapter 6 Tenant Selection</p> <p>6.7 Verification of Local Preference</p>		<p>***ADD TO CURRENT SECTION</p> <p>If, during the course of processing an application, it becomes evident that an applicant has falsified or otherwise misrepresented any facts about his/her current situation, history, or behavior in a way that affects eligibility, preferences, applicant selection criteria qualification, allowances, or rent, the application must be rejected.</p>

Admissions and Continued Occupancy Policy (ACOP) Changes/Additions 2024

<p>Chapter 7 General Verification Requirements</p> <p>7.2 Methods of Income and Adjustments to Income Verification</p> <p>7.2.3 EIV Verification</p>	<p>EIV is the verification of income, before or during a family re-examination and after move-in, through an independent source that systematically and uniformly maintains income information in computerized form for a large number of individuals. Users are allowed to search for income records by head of household social security number, program type and/or by annual reexamination. The use of EIV is the mandatory income verification method if the information is available on the system.</p>	<p>SLHA must use HUD’s Enterprise Income Verification (EIV) System to employment and income information at annual and streamlined reexaminations of family composition and income. Users are allowed to search for income records by head of household social security number, program type and/or by annual re-examination. The use of EIV is the mandatory income verification method if the information is available on the system.</p> <p>SLHA is required to use the following reports from the EIV System:</p> <ul style="list-style-type: none"> • Debts Owed & Termination, • Deceased Tenants, • Existing Tenant Search, • Failed EIV Pre-Screening, • Failed SSI Identity Test, • Identity Verification, • Multiple Subsidy, • New Hires, No Income Report by HHA or SSA, • No Income Reported on 50058, • Summary of Household Information
<p>Chapter 8 Eligibility for Admissions</p> <p>8.5 Eligibility Restrictions Due to Family Assets [CFR 5.618(a), 24 CFR 5.618(a)(ii)]</p>	<p>DRAFT</p>	<p>***ADD NEW SECTION</p> <p>Eligibility Restrictions Due to Family Assets [CFR 5.618(a), 24 CFR 5.618(a)(ii)]</p> <p>Families are ineligible to receive assistance in the public housing program if their net family assets exceed \$100,000 or if the family owns real property suitable for the family to live in.</p> <p>A family cannot receive benefits if they have “present ownership interest in, a legal right to reside in, and the effective legal authority to sell, based on state or local laws of the jurisdiction where the property is located, real property that is suitable for occupancy by the family as a residence.”</p>

Admissions and Continued Occupancy Policy (ACOP) Changes/Additions 2024

		<p>The restriction on owning real property does not apply to:</p> <ul style="list-style-type: none"> • Property jointly owned with someone else, and occupied by the other owner who is not a member of the household receiving benefits. • A victim of domestic violence, dating violence, sexual assault, or stalking. • A family that is offering the property for sale <p>A family that owns a property may show it is not “suitable for occupancy” if it:</p> <ul style="list-style-type: none"> • Does not meet the disability-related needs for all members of the family. For example: physical needs, proximity to transit, need for additional bedrooms or space, etc. • Is not sufficient for the size of the family. • Is located so as to be a hardship for the family. For example: the location would be a hardship for the family’s commute to work or school • Is unsafe because of physical condition—unless issues can be “easily remedied” • Cannot be a residence per local or state laws. For example: a storefront zoned for commercial use only
<p>Chapter 8 Eligibility for Admissions</p> <p>8.6 Social Security Numbers [24 CFR 5.216 and 5.218]</p>	<p>Social Security Numbers [24 CFR 5.216 and 5.218]</p>	<p>Social Security Numbers [24 CFR 5.216 and 5.218, 24 CFR 5.216(g)(1)]</p> <p>***ADD TO CURRENT SECTION</p> <p>SLHA requires that each family member (excepting non-eligible family members in mixed families) provide their Social Security number (SSN) and proof that the SSN belongs to that person. If a member of the family is unable to provide a Social Security card or other evidence of their SSN, SLHA will accept a document stating the person’s name and a declaration from the person stating 1) why they cannot obtain their Social Security card and 2) what their SSN is. If SLHA has accepted any declarations as evidence of a SSN, SLHA will review HUD’s Enterprise Income Verification’s (EIV) Failed SSA Identity Report monthly to quickly identify any participants whose identity is not verified.</p>

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<p>Chapter 8 Eligibility for Admissions</p> <p>8.7 Family Consent to Release Information</p>	<p>Family Consent to Release of Information [24 CFR 5.230]</p> <p>Each adult family member, and the head of household, spouse, life partner, or co-head, regardless of age, must sign form HUD-9886-A, Authorization for the Release of Information/Privacy Act Notice, and other consent forms as needed to collect information relevant to the family's eligibility and level of assistance. SLHA's managing agent will deny admission to the program if any member of the applicant family fails to sign and submit the consent forms for obtaining information</p>	<p>Family Consent to Release of Information [24 CFR 5.230]</p> <p>Each adult family member, and the head of household, spouse, life partner, or co-head, regardless of age, must sign form HUD-9886-A, Authorization for the Release of Information/Privacy Act Notice, and other consent forms as needed to collect information relevant to the family's eligibility and level of assistance. SLHA's managing agent will deny admission to the program if any member of the applicant family fails to sign and submit the consent forms for obtaining information. At each annual or interim reexamination, if any family member turned 18 and has not yet signed the HUD-9886-A form they will be required to sign the HUD-9886-A form.</p> <p>The executed consent form (Form HUD-9886) will remain effective until the family is denied assistance, the assistance is terminated, or if the family provides written notification to the SLHA to revoke consent. Families have the right to revoke consent by notice to SLHA, however, revoking consent will result in termination or denial of assistance.</p>
<p>Chapter 11 Income Determination</p> <p>11.2 Anticipating Annual Income</p> <p>11.2.2 Basis of Annual Income Projection</p>	<p>Basis of Annual Income Projection</p>	<p>Basis of Annual Income Projection [24 CFR 5.609(c)]</p> <p>***ADD TO CURRENT SECTION</p> <p>For initial occupancy and interim reexaminations, SLHA must estimate the family income for the previous 12-month period using period using current income. For all annual reexaminations, SLHA must determine the family income for the previous 12-months, taking into account any redetermination for an interim reexamination and any accounted for income changes.</p> <p>SLHA will not be considered out of compliance for a "de minimis" error that results in a difference in the determination of a family's adjusted income \$30 or less per month (or \$360 in annual adjusted income)</p>

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<p>Chapter 11 Income Determination</p> <p>11.3 Income Included in Annual Income</p>	<p>Income Included in Annual Income</p>	<p>Income Included in Annual Income [24 CFR 5.609(a)]</p> <p>***ADD TO CURRENT SECTION</p> <p>Annual income includes, with respect to the family:</p> <ul style="list-style-type: none"> • All amounts, not specifically excluded, received from all sources by each member of the family 18 years or older, plus • Unearned income by or on behalf of each dependent who is under 18 years of age, and • Imputed returns on net family assets exceeding \$50,000 (adjusted annually using the Consumer Price Index) when the value of the actual returns from a given asset cannot be calculated. Imputed returns are based on the current passbook savings rate, as determined by HUD.
<p>Chapter 11 Income Determination</p> <p>11.3 Income Include in Annual Income</p> <p>11.3.4 Assets</p>	<p>Assets</p> <p>Annual income includes the interest, dividends and other net income of any kind from real or personal property. For most types of assets, SLHA will determine the value of the asset in order to compute income from the asset. As is true for all sources of income, SLHA will use other than current circumstances to anticipate income when an imminent change in circumstances is expected, it is not feasible to anticipate a level of income over 12 months, or SLHA believes that past income is the best indicator of anticipated income. For example, if a family member owns real property that typically receives rental income but the property is currently vacant, SLHA can take into consideration past rental income along with the prospects of obtaining a new tenant. Anytime current circumstances are not used to determine asset income, a clear rationale for the decision will be documented in the file. The family may present information and documentation to SLHA to show why the asset income determination does not represent the family's anticipated asset income.</p>	<p>Assets [24 CFR 5.603(b) "Net Family Assets" Para. (1), (3) and (4), 24 CFR 5.618(b)]</p> <p>Annual income includes the interest, dividends and other net income of any kind from real or personal property. Net family assets include the net cash value of all assets owned by the family, after deducting reasonable costs that would be incurred in disposing of real property, savings, stocks, bonds, and other forms of capital investment. For most types of assets, SLHA will determine the value of the asset in order to compute income from the asset. As is true for all sources of income, SLHA will use other than current circumstances to anticipate income when an imminent change in circumstances is expected, it is not feasible to anticipate a level of income over 12 months, or SLHA believes that past income is the best indicator of anticipated income. For example, if a family member owns real property that typically receives rental income but the property is currently vacant, SLHA can take into consideration past rental income along with the prospects of obtaining a new tenant. Anytime current circumstances are not used to determine asset income, a clear rationale for the decision will be documented in the file. The</p>

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		<p>family may present information and documentation to SLHA to show why the asset income determination does not represent the family’s anticipated asset income.</p> <p>For documentation of net family assets under \$50,000, the SLHA may accept self-certification from the family that the assets are under that amount.</p> <ul style="list-style-type: none"> • Certification must include any expected income from the assets (actual returns only). • No further documentation is required by the SLHA for the net family asset restriction. • Assets must be verified every 3 years. <p>For documentation of property ownership, SLHA may accept self-certification that the “family does not have any present ownership interest in any real property.” If family declares a property and asks for an exemption because a family member is a victim of domestic violence, dating violence, sexual assault, or stalking:</p> <ul style="list-style-type: none"> • SLHA must accept self-certification of the family member • SLHA will provide the family member with Form HUD 5380 Notice of Occupancy Rights under VAWA and Form HUD 5382 Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking, and Alternate Documentation
<p>Chapter 11 Income Determination</p> <p>11.3.4.2 Income Excluded from Annual Income</p> <p>11.4.2 Lump-Sum Receipts</p>		<p>***ADD TO CURRENT SECTION</p> <p>Several types of lump-sum payment are specifically excluded from net family assets:</p> <ul style="list-style-type: none"> • Any amounts recovered in any civil action or settlement based on a claim of malpractice, negligence, or other breach of duty owed to a family member, for an incident resulting in a disability • Federal tax refunds or refundable tax credits for a period of 12 months after receipt by the family

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<p>Chapter 11 Income Determination</p> <p>11.3 Income Include in Annual Income</p> <p>11.3.4 Assets</p> <p>11.3.4.3.Imputing Income from Assets</p>	<p>Imputing Income from Assets</p> <p>When net family assets are \$5,000 or less, SLHA will include in annual income the actual income anticipated to be derived from the assets. When the family has net family assets in excess of \$5,000, SLHA will include in annual income the greater of the actual income derived from the assets or the imputed income. Imputed income from assets is calculated by multiplying the total cash value of all family assets by the current HUD established passbook savings rate.</p>	<p>Imputing Income from Assets [24 CFR 5.609(a)]</p> <p>In general, income from assets is considered income. If it is possible to determine the actual returns from an asset, SLHA should use that amount. If it is not possible to calculate an actual return on an asset, and:</p> <ul style="list-style-type: none"> • the net family assets are \$50,000 or less, the imputed income from that asset is excluded. • If the net family assets are over \$50,000, SLHA will impute income for the asset based on the current passbook savings rate, as determined by HUD.
<p>Chapter 11 Income Determination</p> <p>11.3 Income Include in Annual Income</p> <p>11.3.4 Assets</p> <p>11.3.4.8.1 Checking and Savings Accounts</p>		<p>***ADD TO CURRENT SECTION</p> <p>The value of retirement accounts recognized by the IRS (IE: IRA, 401(k), 401(b) and retirement plans for self-employed individuals) Family Self-Sufficiency (FSS) Accounts (FSS)Retirement, and the value of certain education or disability support savings accounts is excluded from net family income.</p>
<p>Chapter 11 Income Determination</p> <p>11.3 Income Include in Annual Income</p> <p>11.3.4 Assets</p>		<p>***ADD TO CURRENT SECTION</p> <p>There are several exclusions where the value of the real property does not count towards net family assets</p> <ul style="list-style-type: none"> • Real property that the family does not have the effective legal authority to sell in the jurisdiction in which the property is located (IE: property subject to a lawsuit may be legally restricted from sale) • Real property where the family has interest in land held in trust by Bureau of Indian Affairs • Real property where the family has equity in a manufactured home where the family receives assistance under 24 CFR 982 HCV

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<p>Chapter 11 Income Determination</p> <p>11.3 Income Include in Annual Income</p> <p>11.3.4 Assets</p> <p>11.3.4.8.3 Equity in Real Property or Other Capital Investments</p>		<ul style="list-style-type: none"> • Real property where the family receives assistance under 24 CFR 982 (HCV homeownership participant)
<p>Chapter 11 Income Determination</p> <p>11.3 Income Include in Annual Income</p> <p>11.3.4 Assets</p> <p>11.3.4.9.2 Non-Revocable Trusts</p>	<p>In cases where a trust is not revocable by, or under the control of, any member of a family, the value of the trust fund is not considered an asset. Non-revocable trusts are excluded from net family assets. However, any income distributed to the family from such a trust is counted as a periodic payment or a lump-sum receipt, as appropriate.</p>	<p>In cases where a trust is not revocable by, or under the control of, any member of a family, the value of the trust fund is not considered an asset. Non-revocable trusts are excluded from net family assets. However, any income distributed to the family from such a trust is counted as a periodic payment or a lump-sum receipt, as appropriate.</p>
<p>Chapter 11 Income Determination</p> <p>11.3 Income Include in Annual Income</p> <p>11.3.4 Assets</p> <p>11.3.4.10 Retirement</p>	<p>In order to correctly include or exclude as an asset any amount held in a company retirement or pension account by an employed person, SLHA must know whether the money is accessible before retirement. While a family member is employed, only the amount the family member can withdraw without retiring or terminating employment is counted as an asset. After a family member retires or terminates employment, any amount distributed to the family member is counted as a periodic payment or a lumpsum receipt, as appropriate, except to the extent that it represents funds invested in the account by the family member. The balance in</p>	<p>Retirement account recognized by IRS IRA, 401(k), 401(b) and retirement plans for self-employed individuals are excluded from net family assets.</p>

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<p>Accounts</p>	<p>the account is counted as an asset only if it remains accessible to the family member. IRA, Keogh and similar retirement savings accounts are counted as assets even though early withdrawal would result in a penalty.</p>	
<p>Chapter 11 Income Determination</p> <p>11.3 Income Include in Annual Income</p> <p>11.3.4 Assets</p> <p>11.3.4.11 Personal Property</p>	<p>Personal property held as an investment, such as gems, coin collections, antique cars, etc., is considered an asset. In determining the value of personal property held as an investment, SLHA will use the family's estimate of the value. Generally, personal property held as an investment generates no income until it is disposed of. If regular income is generated (e.g., income from renting the personal property), the amount that is expected to be earned in the coming year is counted as actual income from the asset. Necessary items of personal property are not considered assets and are excluded from net family assets provided the combined total value does not exceed \$50,000. Necessary personal property consists of only those items not held as an investment, and may include clothing, furniture, household furnishings, jewelry and vehicles, including those specially equipped for persons with disabilities.</p>	<p>Personal property held as an investment, such as gems, coin collections, antique cars, etc., is considered an asset. In determining the value of personal property held as an investment, SLHA will use the family's estimate of the value. Generally, personal property held as an investment generates no income until it is disposed of. If regular income is generated (e.g., income from renting the personal property), the amount that is expected to be earned in the coming year is counted as actual income from the asset. Necessary items of personal property are not considered assets and are excluded from net family assets provided the combined total value does not exceed \$50,000. Necessary personal property consists of only those items not held as an investment, and may include clothing, furniture, household furnishings, jewelry and vehicles, including those specially equipped for persons with disabilities.</p>

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<p>Chapter 11 Income Determination</p> <p>11.4 Income Excluded for Annual Income</p> <p>11.4.1 Non-Recurring Income</p>	<p>Temporary, Nonrecurring, or Sporadic Income</p> <p>Temporary, nonrecurring or sporadic income is not included in annual income. Sporadic income is income that is not received periodically and cannot be reliably predicted. For example, the income of an individual who works occasionally as a handyman would be considered sporadic if future work could not be anticipated and no historic, stable pattern of income existed. Sporadic income includes temporary payments from the U.S. Census Bureau for employment lasting no longer than 180 days</p>	<p>Non-Recurring Income</p> <p>Non-recurring income is income that will not be repeated in the coming year based on information provided by the family. Some examples of non-recurring income include:</p> <ul style="list-style-type: none"> • U.S. Census Bureau for employment income (relating to decennial census or the American Community Survey) lasting no longer than 180 days and not resulting in permanent employment. • Direct federal or state payments for economic stimulus or recovery. • State or federal refundable tax credits or state or federal tax refunds received directly at the time they are received directly by the family. • Gifts for significant life events or milestones (e.g., holidays, birthdays, wedding gifts, baby showers, anniversaries). • Non-monetary, in-kind donations, such as food, clothing, or toiletries, received from a food bank or similar organization. • Lump-sum additions to net family assets, including but not limited to lottery or other contest winnings <p>Income received as an independent contractor, day laborer, or seasonal worker is NOT excluded from income, even if the source, date, or amount of the income varies.</p>
<p>Chapter 11 Income Determination</p> <p>11.4 Income Excluded for Annual Income</p> <p>11.4.2 Children's Earnings</p>	<p>Children's Earnings</p> <p>Employment income earned by children (including foster children) under the age of 18 years is not included in annual income.</p>	<p>Minors Earned Income [24 CFR 5.609(b)(3)]</p> <p>Employment income earned by children (including foster children) under the age of 18 years is not included in annual income.</p>

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<p>Chapter 11 Income Determination</p> <p>11.4 Income Excluded for Annual Income</p> <p>11.4.3 Certain Earned Income of Full-Time</p>	<p>Certain Earned Income of Full-Time Students</p> <p>Students Earnings in excess of \$480 for each full-time student 18 years old or older (except for the head, spouse, life partner or co-head) are not counted. To be considered “full-time,” a student must be considered “full-time” by an educational institution with a degree or certificate program. Any student financial assistance not subject to inclusion is fully excluded from annual income, whether it is paid directly to the student or to the educational institution the student is attending.</p>	<p>Certain Earned Income for full-time dependent students and financial aid for both full and part-time student</p> <p>11.4.3.1 Mandatory Deduction for Full-time Students 24 CFR 5.609(b)(14)</p> <p>Earnings in excess of \$480 for each full-time student 18 years old or older (except for the head, spouse, life partner or co-head) are not counted. To be considered “full-time,” a student must be considered “full-time by an educational institution with a degree or certificate program. The above deduction is for 2024 and subject to change as HUD generally revises the amount on annual basis. The latest amount, as established and approved by HUD, shall be applicable and is automatically incorporated into this policy as of the effective date of the newly established amount.</p> <p>11.4.3.2 Educational Savings Account 24 CFR 5.609(b)(10)</p> <p>Any amount in or from, or any benefits, income, or distributions from, any Coverdell educational savings account of or any qualified tuition program under IRS sections 529 and 530 shall be excluded from income</p> <p>11.4.3.3 Student Financial Assistance 24 CFR 5.609(b)(9)</p> <p>Any other grant-in-aid, scholarship, or other assistance amounts an individual receives for the actual covered costs charged by the institute of higher education is excluded from a family’s income. Exclusion applies equally to full and part-time students.</p> <p>11.4.3.4 Title IV HEA Assistance 24 CFR 5.609(b)(9)(i)</p> <p>Any assistance under section 479B of the Higher Education Act of 1965, as amended, requires to be excluded from a family’s income, referred to here as, “Title IV HEA Assistance.” Title IV HEA Assistance includes, but is not limited to:</p> <ul style="list-style-type: none"> • Bureau of Indian Affairs/ Education student assistance programs. Current examples include: The Higher Education Tribal Grant,
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		<p>and The Tribally Controlled Colleges or Universities Grant Program.</p> <ul style="list-style-type: none">• Federal Pell Grants• Teach Grants• Federal Work-Study Programs• Federal Perkins Loans• Income earned in employment and training programs under section 134 of the Workforce Innovation and Opportunity Act (WIOA), including: workforce investment activities for adults and workers dislocated as a result of permanent closure or mass layoff at a plant, facility, or enterprise, or a natural or other disaster that results in mass job dislocation, in order to assist such adults or workers in obtaining reemployment as soon as possible.• All assistance under Title IV of the HEA as well as Bureau of Indian Affairs student financial assistance, even assistance provided to students in excess of tuition and required fees or charges, is excluded from HUD income calculations. <p>11.4.3.5 Other Student Financial Assistance 24 CFR 5.609(b)(9)(ii)</p> <p>Other assistance, for both full and part-time students, that is not included under Title IV of the HEA or under Bureau of Indian Affairs student assistance programs. To qualify as excluded student financial assistance under this category, the aid must be:</p> <ul style="list-style-type: none">• Used for “actual covered costs”• Expressly to assist the student with the costs of higher education;• Expressly to assist a student who is not the head of household or spouse, with the reasonable and actual costs of housing while attending the institution of higher education and not residing in an assisted unit;• A grant or scholarship received from the federal government, a State, Tribe, or local government; or a private foundation registered as a nonprofit under 26 U.S.C. 501(c)(3); a business entity (such as corporation, general partnership, limited liability company, limited partnership, joint venture, business trust,
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		<p>public benefit corporation, or nonprofit entity); or an institution of higher education.</p> <p>The aid may be paid directly to the student or to the educational institution on the student’s behalf. However, any student financial assistance paid to the student must be verified by the SLHA as consistent with this section.</p> <p>Student financial assistance, excluded here, does not include:</p> <ul style="list-style-type: none"> • Any assistance that is already excluded under Title IV of the HEA • Financial support provided to the student in the form of a fee for services performed (e.g., a work study or teaching fellowship that is not excluded as Title IV HEA Assistance). • Gifts, including gifts from family or friends; or • Any amount of the scholarship or grant that, either by itself or in combination with HEA assistance exceeds the actual covered costs of the student.
<p>Chapter 11 Income Determination</p> <p>11.4 Income Excluded for Annual Income</p> <p>11.4.11 Additional Exclusions from Annual Income</p>	<ul style="list-style-type: none"> • Adoption Assistance payments in excess of \$480 per adopted child 	<ul style="list-style-type: none"> • Adoption assistance payments [24 CFR 5.609(b)(15)]

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<p>Chapter 11 Income Determination</p> <p>11.4 Income Excluded for Annual Income</p> <p>11.4.12 Federally Mandated Income Exclusions [24 CFR 5.609(b)(22)]</p>		<p>***ADD NEW SECTION</p> <p>Federally Mandated Income Exclusions [24 CFR 5.609(b)(22)]</p> <p>Amounts that HUD is required by federal statute to exclude as income for determining eligibility or benefits will be included in this section following publication by HUD in the Federal Register. As HUD issues subsequent notices this section will be updated with additional information.</p>
<p>Chapter 11 Income Determination</p> <p>11.4 Income Excluded for Annual Income</p> <p>11.4.13 Excluded Assets [25 CFR 5.603(b) "Net Family Assets" Para. (3) and (4)]</p>		<p>***ADD NEW SECTION</p> <p>Excluded Assets [25 CFR 5.603(b) "Net Family Assets" Para. (3) and (4)]</p> <p>The Housing Opportunity Through Modernization Act of 2016 specifically excludes certain assets from the definition of net family assets.</p> <ul style="list-style-type: none"> • Necessary items of personal property including but not limited to, Medical devices, vehicle for commuting, etc. • Non-necessary items of personal property if the combined total value does not exceed \$50,000. For example, vintage baseball cards, recreational boat, coin collection, art so long as the total value is under the limit, etc. • Retirement account recognized by IRS IRA, 401(k), 401(b) and retirement plans for self-employed individuals • Real property that the family does not have the effective legal authority to sell in the jurisdiction in which the property is located. For example, property subject to a lawsuit may be legally restricted from sale. • Any amounts recovered in any civil action or settlement based on a claim of malpractice, negligence, or other breach of duty owed to a family member, for an incident resulting in a disability

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		<ul style="list-style-type: none"> • The value of certain education or disability support savings accounts Under Internal Revenue Code sections 529, 529A, 530, “baby bond” accounts Coverdell accounts, tuition programs, any “baby bond” account created, authorized, or funded by Federal, state, or local government Real property Interest in Indian trust land Family has interest in land held in trust by Bureau of Indian Affairs Existing exclusion • Equity in a manufactured home where the family receives assistance under the Housing Choice Voucher Program (24 CFR 982) • Equity in property where the family receives assistance under the Housing Choice Voucher Program (24 CFR 982) HCV Homeownership Program • Family Self-Sufficiency (FSS) accounts • Federal tax refunds or refundable tax credits for a period of 12 months after receipt by the family Earned Income Tax Credits (EITC) <p>Trust Funds are not revocable by, or under the control of, any member of the family or household</p>
<p>Chapter 11 Income Determination</p> <p>11.6 Earned Income Disallowance</p>	<p>Earned Income Disallowance [24 CFR 960.255 and Notice PIH 2016-05]</p>	<p>Earned Income Disallowance [24 CFR 960.255 and Notice PIH 2016-05]</p> <p>***ADD TO SECTION</p> <p>EID is only available to families that are eligible for and already participating in the program as of January 1, 2021. After January 1, 2021, eligible families may continue to receive the benefits of EID until their 12-month period has expired. Effective January 1, 2026 no families will receive the EID benefit.</p>

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<p>Chapter 11 Income Determination</p> <p>11.6 Earned Income Disallowance</p> <p>11.6.6 Jobs Plus Earned Income Disregard (JPEID) – Clinton Peabody only</p>	<p>Jobs Plus Earned Income Disregard (JPEID) – Clinton Peabody only</p> <p>SLHA will disallow all earned income from rent determinations for families participating in the Jobs-Plus Pilot Program at Clinton Peabody. The disregard applies to all earned income increases due to employment over the baseline income for the remaining term of the grant beginning on the date on which employment commenced. To qualify for JPEID, the family members must be enrolled in the Jobs-Plus program. There shall be no phase-in period for families participating in Jobs-Plus and upon completion of the grant, the family shall be required to provide 100% of the amount of the applicable total rent increase. The standard lifetime maximum 24-month disallowance proscribed in 11.6.5 shall not apply to families participating in Jobs-Plus.</p>	<p>***REMOVE SECTION</p>
<p>Chapter 11 Income Determination</p> <p>11.7 Determination of Income Using Other Means Tested Public Assistance (IE, “Safe Harbor” [24 CFR 5.609(c)(3)]</p>	<p>DRAFT</p>	<p>***ADD SECTION</p> <p>Determination of Income Using Other Means Tested Public Assistance (IE, “Safe Harbor” [24 CFR 5.609(c)(3)]</p> <p>SLHA may determine the family’s income prior to the application of any deductions based on income calculation information from other means-tested forms of federal public assistance programs or agencies, listed below, made within the previous 12-month period.</p> <p>SLHA will use third-party verification, which must include the family size and composition and state the family’s annual income. The verification must be dated within the time frame specified for the type of verification, including within the previous 12-month period for purposes of the specified means-tested forms of federal public assistance. The family members listed in the third-party verification must match the family composition in the assisted unit. The annual income need not be broken down by family members nor income type.</p>

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		<p>Given that annual income includes income earned from assets, when using Safe Harbor to verify a family's income, SLHA will not inquire as to a family's net family assets, nor the income earned from those assets except with respect to whether the family owns assets which exceed the asset limitation in 24 CFR § 5.618.</p> <p>If multiple determinations are available that meet all of the minimum verification criteria, SLHA will use the most recent determination (if completed more than 3 months apart). If determinations were completed within 3 months, SLHA will use them in the following order:</p> <ol style="list-style-type: none">1) The Low-Income Housing Tax Credit program (26 U.S.C. 42).2) The Supplemental Nutrition Assistance Program (42 U.S.C. 2011 et seq.).3) The Special Supplemental Nutrition for Women, Infants, and Children (42 U.S.C. 1786).4) The Temporary Assistance for Needy Families block grant (42 U.S.C. 601, et seq.).5) Medicaid (42 U.S.C. 1396 et seq.).6) Supplemental Security Income (42 U.S.C. 1381 et seq.).7) The Earned Income Tax Credit (26 U.S.C. 32). <p>If SLHA cannot obtain the required third-party verification, or if the family disputes the determination, the SLHA will calculate the family's annual income using the methods established in 5.609(c)(1) and (2) or in the applicable program regulations.</p>
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<p>Chapter 12 Verifying Income</p> <p>12.10 Income From Assets</p>	<p>Income from Assets</p>	<p>Income from Assets [24 CFR 5.603(b) and (“Net Family Assets” para. (2); 5.618(b)], 24 CFR 5.603(b)(3) and (4)]</p> <p>SLHA will determine each family’s net family assets at the time of admission and at annual and interim reexaminations. For new admissions, SLHA will determine net family assets and anticipated income earned from assets based solely on a family self-certification, provided that net family assets are equal to or less than \$50,000. After a family’s assets of \$50,000 or less have been self-certified for two years in a row, at the next annual reexamination, SLHA will fully verify net family assets and anticipated income earned from assets. After fully verifying the family’s net family assets, SLHA will resume accepting self-certification until the third annual reexam following the most recent full verification. If net family assets are greater than \$50,000, assets will be fully verified in accordance with the methods detailed in this section. When calculating Net Family Assets, the PHA must include the value of non-necessary items of personal property if the combined value exceeds \$50,000. When determining new family assets, SLHA will take the following steps:</p> <ol style="list-style-type: none"> 1. Provide the family with a description of non-necessary personal property and ask the family to estimate the total value of their non-necessary personal property. If the family estimates that their non-necessary personal property is valued under \$50,000 (as adjusted annually for inflation) then the SLHA will not ask the family to report the individual items of non-necessary personal property, except every third year when the SLHA is fully verifying all assets. 2. If the family’s non-necessary personal property has a net value over \$50,000, SLHA will ask the family to report a full list of their non-necessary personal property. SLHA will assess the list to determine if any of the items are necessary personal property. SLHA will make a determination as to each item identified, based on HUD (or SLHA) guidance, and if the item is determined to be necessary, or otherwise excluded from net family assets, like a retirement
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		<p>account, educational savings account, etc., it will be excluded from the family's net assets.</p> <p>SLHA will consider the following to be necessary items of personal property:</p> <ul style="list-style-type: none">• Any automobile regularly used by a member of the family to commute to work, school, or childcare• Any computer or electronic device (such as laptop, tablet, monitor, or cellphone) that is used by any family member to work, look for work, or study• Any item used for religious purposes (such as a historic book of scripture).• Any furniture used in the family's home• Jewelry or other keepsakes which hold religious or cultural value, or deep family significance. <p>SLHA will consider the following to be non-necessary items of personal property:</p> <ul style="list-style-type: none">• Bank accounts and other financial investments (e.g., checking account, savings account, stocks/bonds)• Any automobile that is used purely for recreation (such as an RV or camping trailer) and not for any of the defined "necessary" uses,• Collectible items (such as sports cards or trading cards) that are not used for a work-related purpose by a family member SLHA may make case-specific determinations of other "necessary" items.
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<p>Chapter 12 Verifying Income</p> <p>12.10 Income From Assets</p> <p>12.10.5 Assets Disposed of for Less than Fair Market Value (FMV) During Two Years Preceding Effective Date of Certification or Recertification</p>	<p>SLHA will obtain the family's certification as to whether any member has disposed of assets for less than fair market value during the two years preceding the effective date of the certification or re-certification. If the family certifies that they have disposed of assets for less than fair market value, verification or certification is required that shows: all assets disposed of for less than FMV, the date they were disposed of, the amount the family received, and the market value of the assets at the time of disposition. Third party verification will be obtained wherever possible.</p>	<p>SLHA will obtain the family's certification as to whether any member has disposed of assets for less than fair market value during the two years preceding the effective date of the certification or re-certification. SLHA must include the value of any business or family assets sold for less than fair market value (including a disposition in trust, but not in a foreclosure or bankruptcy sale) during the two years preceding the date of application or reexamination, in excess of the amount received. In the case of a sale as part of a separation or divorce settlement, the sale or other disposition will not be considered to have been for less than fair market value if the applicant or tenant receives other compensation not measurable in dollar terms. Negative equity in real property or other investments does not prohibit the owner from selling the property or other investments, so negative equity alone would not justify an exclusion from family assets. If the family certifies that they have disposed of assets for less than fair market value, verification or certification is required that shows: all assets disposed of for less than FMV, the date they were disposed of, the amount the family received, and the market value of the assets at the time of disposition. Third party verification will be obtained wherever possible.</p>
<p>Chapter 12 Verifying Income</p> <p>12.11 Zero Income Status</p>	<p>Zero Income Status</p> <p>SLHA will check UIV sources and/or request information from third party sources to verify that certain forms of income such as unemployment benefits, TANF, SSI, etc., are not being received by families claiming to have zero annual income. Income of families claiming to have zero income will be reviewed at least every six months.</p>	<p>Zero Income Status [24 CFR § 5.609(b)(24)(vi); 24 CFR §§ 5.657(c)(3); 960.257(b)(3); 982.516(c)(3); and 882.515(b)(3)]</p> <p>SLHA will check UIV sources and/or request information from third party sources to verify that certain forms of income such as unemployment benefits, TANF, SSI, etc., are not being received by families claiming to have zero annual income. SLHA will no longer conduct zero income review for zero income families. Instead, SLHA will monitor zero income families in EIV to identify increases in income.</p>

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<p>Chapter 13 Adjustments to Annual Income</p> <p>13.1 Overview</p>	<p>This chapter defines the allowable expenses and deductions to be subtracted from annual income to determine the family's adjusted annual income. SLHA will use the methods as set forth in this chapter to determine accurate adjustments to income to ensure that families are not paying more or less for rent than their obligation. SLHA must verify all adjustments to annual income. Verification requirements are provided in Chapters 7 and 14</p>	<p>This chapter defines the allowable expenses and deductions to be subtracted from annual income to determine the family's adjusted annual income. SLHA will use the methods as set forth in this chapter to determine accurate adjustments to income to ensure that families are not paying more or less for rent than their obligation. SLHA must verify all adjustments to annual income. Verification requirements are provided in Chapters 7 and 14. SLHA will not be considered out of compliance for a "de minimis" error that results in a difference in the determination of a family's adjusted income \$30 or less per month (or \$360 in annual adjusted income).</p>
<p>Chapter 13 Adjustments to Annual Income</p> <p>13.2 Dependent Deduction</p>	<p>Dependent Deduction</p> <p>SLHA will deduct \$480 from the annual income for each dependent. A dependent is any family member other than the head, spouse, life partner or co-head who is under the age of 18 or who is 18 or older and is a person with disabilities or a full time student. Foster children, foster adults and live-in aides are never dependents.</p>	<p>Dependent Deduction [24 CFR 5.611 (a)(1)-(a)(2)]</p> <p>SLHA will deduct \$480 from the annual income for each dependent. A dependent is any family member other than the head, spouse, life partner or co-head who is under the age of 18 or who is 18 or older and is a person with disabilities or a full time student. Foster children, foster adults and live-in aides are never dependents. The above deduction is for 2024 and subject to change as HUD generally revises the amount on annual basis. The latest amount, as established and approved by HUD, shall be applicable and is automatically incorporated into this policy as of the effective date of the newly established amount.</p>
<p>Chapter 13 Adjustments to Annual Income</p> <p>13.3 Elderly or Disabled Family Deduction</p>	<p>Elderly or Disabled Family Deduction</p> <p>SLHA will deduct \$400 from the annual income for any elderly or disabled family. An elderly family is a family whose head, spouse, life partner, co-head or sole member is 62 years of age or older. A disabled family is a family whose head, spouse, life partner, co-head or sole member is a person with disabilities. Only a single \$400 will be taken per family.</p>	<p>Elderly or Disabled Family Deduction [24 CFR 5.611 (a)(1)-(a)(2)]</p> <p>SLHA will deduct \$525 from the annual income for any elderly or disabled family. An elderly family is a family whose head, spouse, life partner, co-head or sole member is 62 years of age or older. A disabled family is a family whose head, spouse, life partner, co-head or sole member is a person with disabilities. Only a single \$525 will be taken per family. The above deduction is for 2024 and subject to change as HUD generally revises the amount on annual basis. The latest amount, as established and approved by HUD, shall be applicable and is automatically incorporated into this policy as of the effective date of the newly established amount.</p>

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<p>Chapter 13 Adjustments to Annual Income</p> <p>13.4 Medical Expense Deduction</p>	<p>Medical Expenses Deduction</p> <p>SLHA will deduct unreimbursed medical expenses from the annual income to the extent that, in combination with any disability assistance expenses, they exceed three percent of annual income. The medical expense deduction is only for families in which the head, spouse, life partner or co-head is at least 62 or is a person with disabilities. If a family is eligible for a medical expense deduction, the medical expenses of all family members are included in the determination of the amount of the deduction.</p>	<p>Medical Expenses Deduction [24 CFR 5.611(a)(3)]</p> <p>SLHA will deduct unreimbursed health and medical care expenses plus unreimbursed reasonable attendant care and auxiliary apparatus expenses to the extent that, the sum of expenses exceeds ten percent (10%) of annual income. The medical expense deduction is only for families in which the head, spouse, life partner or co-head is at least 62 or is a person with disabilities. If a family is eligible for a medical expense deduction, the medical expenses of all family members are included in the determination of the amount of the deduction.</p>
<p>Chapter 13 Adjustments to Annual Income</p> <p>13.4 Medical Expense Deduction</p> <p>13.4.2 Hardship Exemptions for Medical Expenses Deductions</p>	<p>DRAFT</p>	<p>***ADD NEW SECTION</p> <p>13.4.2 Hardship Exemptions for Medical Expenses Deductions [24 CFR 5.611(c)(1) and 5.611(c)(2)]</p> <p>There are two types of hardship exemptions to the ten (10%) percent threshold for deducting eligible medical expenses under Section 13.4. General Relief is for families that can demonstrate that the family's eligible medical increased, or the family's financial hardship is a result of a change in circumstances that would not otherwise trigger an interim reexamination. Phased-In Relief, is for families eligible for and taking the Medical Expense Deductions in effect prior to January 1, 2024.</p> <p>13.4.2.1 General Relief</p> <p>A family may request a hardship exemption for health or medical care expenses, reasonable attendant care, or auxiliary apparatus expenses. A family must demonstrate that their applicable expenses increased or they experienced a change in circumstances that resulted in a financial hardship, as defined below, that would not otherwise trigger an interim reexamination. A change in circumstances includes the need for new, qualifying, health/medical, reasonable attendant care and auxiliary</p>

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		<p>apparatus expenses or an increase in the cost of qualifying expenses so that qualifying expenses exceed 5% of the family's annual income.</p> <p>This relief is available regardless of whether the family previously received health and medical deductions or is currently receiving, or previously received, a phased-in hardship exemption under Section 13.4.2.2</p> <p>The exemption ends when the circumstances that made the family eligible for the exemption no longer apply or after 90 days, whichever comes earlier. If the family wishes to request a successive 90-day period for the exemption, they must make that request within 10 days of the end of the current eligibility period.</p> <p>SLHA must comply with the Health Insurance Portability and Accountability Act (HIPAA) (Pub. L. 104-191, 110 Stat. 1936) and the Privacy Act of 1974 (Pub. L. 93-579, 88 Stat. 1896) when requesting documentation to determine eligibility for a hardship exemption. SLHA may not request documentation beyond what is sufficient to determine anticipated health and medical care and/or reasonable attendant care and auxiliary apparatus costs or when a change in circumstances took place.</p> <p>SLHA will verify that:</p> <ul style="list-style-type: none">• The family member for whom the expense is incurred is a person with disabilities.• The expense permits a family member, or members, to work.• The expense is not reimbursed from another source. <p>SLHA will accept written third-party documents provided by the family such as receipts, cancelled checks, billing statements or other evidence of payments. If family-provided documents are not available, SLHA will provide a third-party verification form directly to the care provider(s) requesting the needed information. If third-party verification is not</p>
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		<p>possible, written family certification as to costs anticipated to be incurred and the anticipated period.</p> <p>13.4.2.2 Phased-In Relief</p> <p>Families who received the medical expense deduction based on their most recent income examination prior to January 1, 2024, will begin receiving the 24-month phased-in relief at their next annual or interim reexamination, effective October 1, 2021. Families who receive this phased-in relief will have eligible expenses deducted as follows:</p> <ul style="list-style-type: none"> • 1st twelve months– in excess of 5% of annual income. • 2nd twelve months – in excess of 7.5% of annual income. • After 24 months – in excess of 10% threshold will phase in and remain in effect unless the family qualifies for general hardship relief. <p>Once a family chooses to obtain General Relief, a family may no longer receive the phased-in relief.</p>
<p>Chapter 13 Adjustments to Annual Income</p> <p>13.5 Disability Assistance Expenses Deduction</p> <p>13.5.1 Earned Income Limit on the Disability Assistance Expense Deduction</p>	<p>The disability expense deduction is capped by the amount of earned income received by family members who are 18 years of age or older and who are able to work because of the expense. The earned income used for this purpose is the amount verified before any earned income disallowances or income exclusions are applied.</p>	<p>The disability expense deduction is capped by the amount of earned income received by family members who are 18 years of age or older and who are able to work because of the expense. The earned income used for this purpose is the amount verified before any income exclusions are applied.</p>

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<p>Chapter 13 Adjustments to Annual Income</p> <p>13.7.1.5 Hardship Exemption</p>		<p>***ADD NEW SECTION</p> <p>13.7.1.5 Hardship Exemption [24 CFR 5.611(a)(4)]</p> <p>Families who are ineligible to continue to receive the child care expense deduction may be eligible for a hardship exemption if they are unable to pay rent due to the loss of a child care expense deduction. To qualify families must:</p> <ul style="list-style-type: none">• Already be receiving the childcare deduction.• Demonstrate that the loss of the deduction and that the lack of childcare would cause hardship. <p>The exemption ends when the circumstances that made the family eligible for the exemption no longer apply or after 90 days, whichever comes earlier. If the family wishes to request a successive 90-day period for the exemption, they must make that request within 10 days of the end of the current eligibility period.</p> <p>Families must report changes to SLHA if the circumstances that made the family eligible for the child care deduction are longer applicable. If the family reports the change in circumstances within 30 days, any increase will be effective on the first of the month following 30 days' notice to the family. If a family fails to report a change within the required timeframe, then adjustment will be made retroactive to the date it would have been effective had the information been provided on a timely basis. The family will be responsible for any underpaid rent and may be offered a repayment agreement.</p>
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<p>Chapter 13 Adjustments to Annual Income</p> <p>13.8 Policy for Determination of the Family's Inability to Pay Rent</p>	<p style="text-align: center; font-size: 48px; opacity: 0.3; transform: rotate(-30deg);">DRAFT</p>	<p>***ADD NEW SECTION</p> <p>13.8 Policy for Determination of the Family's Inability to Pay Rent [24 CFR 5.611(e)]</p> <p>It is the policy of SLHA to offer general hardship relief for the regular health and medical expenses deduction and the child care deduction. Hardship includes the following situations:</p> <p>Child care:</p> <ul style="list-style-type: none"> • A death has occurred in the family. In order to qualify under this provision, a family must describe how the death has created a need for child care. • A health/ medical issue in the family which has created the need for child care. In order to qualify under this provision, a family must describe how the health or medical issues have created a need for child care. <p>A family is considered to have a hardship when:</p> <ul style="list-style-type: none"> • The household's family share of total housing costs exceeds 35 percent of adjusted household income. • Or when the family would be evicted because it is unable to pay the tenant portion of the rent. <p>Family health and medical expenses:</p> <ul style="list-style-type: none"> • A change in circumstances includes the need for new, qualifying, health / medical, reasonable attendant care and auxiliary apparatus expenses or an increase in the cost of qualifying expenses so that qualifying expenses exceed 5% of the family's annual income. • For hardship conditions based on loss of income, the hardship condition will continue to be recognized until new sources of income are received that are at least equal to the amount lost.
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		<ul style="list-style-type: none"> • For hardship conditions based upon hardship-related expenses, the minimum rent exemption will continue to be recognized until the cumulative amount exempted is equal to the expense incurred. • The family may receive a deduction of all eligible expenses exceeding 5% of their annual income. • The exemption ends when the circumstances that made the family eligible for the exemption no longer apply or after 90 days, whichever comes earlier.
<p>Chapter 13 Adjustments to Annual Income</p> <p>13.9 Additional (Permissive) Deductions</p>		<p>***ADD NEW SECTION</p> <p>13.9 Additional (Permissive) Deductions [24 CFR 5.611(b)]</p> <p>In addition to deductions that SLHA is required by HUD to consider, SLHA may establish other “permissive” deductions. SLHA has opted not to use permissive deductions.</p>
<p>Chapter 18 Rent Determination</p> <p>18.2 Flat Rents and Family Choice of Rent</p> <p>18.2.5 Flat Rents and Earned Income Disallowance</p>	<p>Flat Rents and Earned Income Disallowance</p> <p>Because the EID is a function of income-based rents, a family currently paying flat rent cannot qualify for the EID even if a family member experiences an event that would qualify the family for the EID. If the family later chooses to pay income-based rent, they would only qualify for the EID if a new qualifying event occurred. A family currently paying flat rent that previously qualified for the EID while paying incomebased rent and is currently within their 24 month period would have the 12 cumulative months of full (100 percent) and half (50 percent) exclusion continue while paying flat rent as long as the employment that is the subject of the exclusion continues, and the 24-month lifetime limit would continue uninterrupted.</p>	<p>***REMOVE SECTION</p>

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	A family paying flat rent could therefore see a family member's 24-month lifetime limit expire while the family is paying flat rent.	
<p>Chapter 18 Rent Determination</p> <p>18.4 Prorated Rent for Mixed Families</p>	When the mixed family's TTP is greater than the maximum rent, SLHA will use the TTP as the mixed family TTP. Once a mixed family has exceeded the over-income limit for twenty-four (24) consecutive months, the family will have their tenancy terminated. In that event, the mixed family will pay their current, prorated rent amount during the 6-month period before termination.	When the mixed family's TTP is greater than the maximum rent, SLHA will use the TTP as the mixed family TTP. Once a mixed family has exceeded the over-income limit for twenty-four (24) consecutive months, the family will have their tenancy terminated in accordance with SHLA's policy for Over Income Families. In that event, the mixed family will pay their current, prorated rent amount during the 6-month period before termination.
<p>Chapter 20 Reexaminations</p> <p>20.4 Interim Reexaminations</p>	Interim Reexaminations	Interim Reexaminations [24 CFR §§ 960.257(b)(6); 982.516(c)(4); and 882.515(b)(4) - (b)(5)]

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<p>Chapter 20 Reexaminations</p> <p>20.5 Changes Affecting Income or Expenses</p>	<p>Changes Affecting Income or Expenses</p>	<p>Changes Affecting Income or Expenses [24 CFR 960.257(b), 982.516(c), 882.515(b)]</p>
<p>Chapter 20 Reexaminations</p> <p>20.5 Changes Affecting Income or Expenses</p> <p>20.5.1 SLHA-Initiated Interim Reexaminations</p>	<p>SLHA-initiated interim reexaminations are those that are scheduled based on circumstances or criteria defined by SLHA. SLHA will conduct interim reexaminations in each of the following instances:</p> <ul style="list-style-type: none"> • For families receiving the Earned Income Disallowance (EID), SLHA will conduct an interim reexamination at the start and conclusion of the second 12-month exclusion period (50% ease-in period) Revised June 22, 2023 20-6 Resolution No. 2968 • If the family has reported zero income, SLHA will conduct an interim reexamination every 6 months as long as the family continues to report that they have no income • If at the time of the annual reexamination, it is not feasible to anticipate a level of income for the next 12 months (e.g. seasonal or cyclic income), SLHA will schedule an interim reexamination to coincide with the end of the period for which it is feasible to project income • If at the time of the annual reexamination, resident-provided documents were used on a provisional basis due to the lack of third party verification, and third party verification becomes available, SLHA will conduct an interim reexamination • SLHA may conduct an interim reexamination at any time in order to correct an error in a previous 	<p>SLHA-initiated interim reexaminations are those that are scheduled based on circumstances or criteria defined by SLHA. SLHA will conduct interim reexaminations in each of the following instances:</p> <ul style="list-style-type: none"> • If the family has reported zero income, SLHA will conduct an interim reexamination every 6 months as long as the family continues to report that they have no income • If at the time of the annual reexamination, it is not feasible to anticipate a level of income for the next 12 months (e.g. seasonal or cyclic income), SLHA will schedule an interim reexamination to coincide with the end of the period for which it is feasible to project income • If at the time of the annual reexamination, resident-provided documents were used on a provisional basis due to the lack of third party verification, and third party verification becomes available, SLHA will conduct an interim reexamination • SLHA may conduct an interim reexamination at any time in order to correct an error in a previous reexamination, or to investigate a resident fraud complaint

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	reexamination, or to investigate a resident fraud complaint	
<p>Chapter 20 Reexaminations</p> <p>20.5 Changes Affecting Income or Expenses</p> <p>20.5.2 Family-Initiated Interim Reexaminations</p> <p>20.5.2.1 Required Reporting</p>	<p>Families are required to report all increases in income including new employment, within 30 days of the date the change takes effect.</p>	<p>Families are required to report all increases in income including new employment, within 30 days of the date the change takes effect. Depending on the anticipated change, SLHA will take the following action:</p> <ul style="list-style-type: none"> • If SLHA anticipates a family’s adjusted income will decrease by greater than 10%, SLHA must conduct an interim reexamination • If SLHA anticipates a family’s adjusted income will decrease by less than 10%, then SLHA may decline the request for reexamination since no reexamination is required. • If SLHA anticipates a family’s adjusted income will increase by greater than 10% SLHA must conduct an interim reexamination. SLHA may decline to conduct an interim reexamination if the increase occurred within three months to a regular annual reexamination.
<p>Chapter 20 Reexaminations</p> <p>20.5 Changes Affecting Income or Expenses</p> <p>20.5.3.3 Effective Dates</p>	<p>SLHA has established the time frames in which any changes that result from an interim reexamination will take effect. The changes may be applied either retroactively or prospectively, depending on whether there is to be an increase or a decrease in the rent, and whether the family reported any required information within the required time frames.</p> <ul style="list-style-type: none"> • If the rent is to increase: <ul style="list-style-type: none"> ○ Change must be expected to last at least thirty days. Revised June 22, 2023 20-7 Resolution No. 2968 	<p>SLHA has established the time frames in which any changes that result from an interim reexamination will take effect. The changes may be applied either retroactively or prospectively, depending on whether there is to be an increase or a decrease in the rent, and whether the family reported any required information within the required time frames.</p> <ul style="list-style-type: none"> • If the rent is to increase: <ul style="list-style-type: none"> ○ Change must be expected to last at least thirty days. ○ The increase generally will be effective on the first of the month following 30 days’ notice to the family.

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	<ul style="list-style-type: none"> ○ The increase generally will be effective on the first of the month following 30 days' notice to the family. ○ If a family fails to report a change within the required time frames, or fails to provide all required information within the required time frames, the increase will be applied retroactively to the date it would have been effective had the information been provided on a timely basis. • If the rent is to decrease: <ul style="list-style-type: none"> ○ The change must be verified to last more than 30 days. ○ The decrease will be effective on the first day of the month following the month in which the change was reported and all required documentation was submitted. In cases where the change cannot be verified until after the date the change would have become effective, the change will be made retroactively. 	<ul style="list-style-type: none"> ○ If a family fails to report a change within the required time frames, or fails to provide all required information within the required time frames, then SLHA must initiate an interim recertification. The increase will be applied retroactively to the first day of the month following the date of the action. • If the rent is to decrease: <ul style="list-style-type: none"> ○ The change must be verified to last more than 30 days. ○ If the family reports income/composition changes in a timely manner to SLHA. If the family has reported the change in income and/or composition to SLHA in a timely manner, the decrease will be effective on the first day of the month following the month in which the change was reported and all required documentation was submitted. In cases where the change cannot be verified until after the date the change would have become effective, the change will be made retroactively. ○ If the family has not reported the change in income and/or composition to SLHA in a timely manner or SLHA determines a change was made and not reported, the rent decrease will be effective on the first day of the month following completion of the reexamination <p>SLHA may make a determination that the late report was due to circumstances outside of the family's control and that the decrease will be implemented retroactively. Situations where late reporting may warrant a retroactive rent decrease include, but are not limited to:</p> <ul style="list-style-type: none"> • Medical emergency • Natural disaster • Wage theft by the employer • Disruptions to SLHA operations <p>When the determination is made that the late report was outside of the family's control, then a retroactive decrease may be applied beginning on the later of the first of the month following the date of the actual</p>
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		<p>decrease in income or the effective date of the most recent admission, interim, or annual income examination. A rent adjustment cannot be retroactive to a date prior to the last income examination</p> <p>In case of any rent adjustment, the family will be provided with clear, written communication after the interim reexamination that shows:</p> <ul style="list-style-type: none"> • Any one-time charge or credit due to a retroactive adjustment. • The new monthly rent due. • The date that rent is due. • The date of the family’s next annual income reexamination.
<p>Chapter 20 Reexaminations</p> <p>20.5 Changes Affecting Income or Expenses</p> <p>20.5.3.4 Discrepancies</p>	<p>Discrepancies</p> <p>During an annual or interim reexamination, SLHA may discover that information previously reported by the family was in error, or that the family intentionally misrepresented information. In addition, SLHA may discover errors made by SLHA. When errors resulting in the overpayment or underpayment of rent are discovered, corrections will be made in accordance with the policies in Chapter 3.</p>	<p>Discrepancies 24 CFR 5.233, 24 CFR §§ 5.609(c)(4); 960.257(f); 982.516(f); 882.515(f); and 882.808(i)(5)</p> <p>During an annual or interim reexamination, SLHA may discover that information previously reported by the family was in error, or that the family intentionally misrepresented information.</p> <p>If it is later determined that a family inaccurately reported income during an interim reexamination, the family may owe the SLHA for any miscalculation in rent based on the family’s incorrect reporting. SLHA will review the EIV New Hires report between annual reexaminations given the SLHA’s policy to not include earned income increases in determining whether the 10% threshold is met for increases in adjusted income when the family previously had an interim reexamination performed for a decrease in annual adjusted income since the last annual reexamination</p> <p>In addition, SLHA may discover errors made by SLHA. SLHA will not be considered out of compliance for a “de minimis” error that results in a</p>

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		<p>difference in the determination of a family's adjusted income \$30 or less per month (or \$360 in annual adjusted income)</p> <p>On becoming aware of an error(s), SLHA must correct retroactively to the effective date of the action the error was made regardless of the dollar amount. SLHA must repay or credit the family regardless of the dollar amount. SLHA must repay or credit the family for overcharged rent, but is not required to charge back rent if the family was undercharged. When errors resulting in the overpayment or underpayment of rent are discovered, corrections will be made in accordance with the policies in Chapter 3.</p>
<p>Chapter 20 Reexaminations</p> <p>20.6 Over Income Families</p>	<p>Over Income Families</p> <p>The Housing Opportunity Through Modernization Act (HOTMA) of 2016 placed an income limitation on public housing tenancies. The over-income requirement states that after a family's adjusted income has exceeded 120 percent of area median income (AMI) (or a different limitation established by the secretary) for two consecutive years, the PHA must either terminate the family's tenancy within six months of the determination, or charge the family a monthly rent that is the higher of the applicable fair market rent (FMR) or the amount of monthly subsidy for the unit, including amounts from the operating and capital funds, as determined by regulations. The over-income limit is calculated by multiplying the very low income limit (VLI) by 2.4, as adjusted for family size. These income limits are established each year by HUD, and published in the Federal Register.</p> <p>At the annual or interim reexamination, if it is determined that a family's adjusted income exceeds the applicable over-income limit, the SLHA will document the family file and begin tracking the family's over-income status.</p>	<p>Over Income Families [24 CFR 960.507, 24 CFR 960.509]</p> <p>The Housing Opportunity Through Modernization Act (HOTMA) of 2016 placed an income limitation on public housing tenancies. The over-income requirement states that after a family's adjusted income has exceeded 120 percent of area median income (AMI) (or a different limitation established by the secretary) for twenty-four (24) consecutive months, the PHA must terminate the family's tenancy within six (6) months of the final notification. The over-income limit is equal to approximately 120% of the AMI and is calculated by multiplying the very low-income limit (VLI) by 2.4, as adjusted for family size. Income limits are established annually by HUD, and published in the Federal Register. Please refer to Appendix 2 of this ACOP for current income limits.</p> <p>At the annual or interim reexamination, if it is determined that a family's adjusted income exceeds the applicable over-income limit, the SLHA will document the family file and begin tracking the family's over-income status. SLHA will notify families in writing within thirty (30) days of the reexamination of their over-income status and that they may be subject to SLHA's Over-Income Policy.</p> <p>If the family's income continues to exceed the applicable over-income limit twelve (12) months after the applicable annual or interim reexamination, SLHA will notify the family in writing that their income</p>

Admissions and Continued Occupancy Policy (ACOP) Changes/Additions 2024

	<p>If the family’s income continues to exceed the applicable over-income limit one year after the applicable annual or interim reexamination, SLHA will notify the family in writing that their income has exceeded the over-income limit for one year, and that the family may be subject to SLHA’s over-income policy.</p> <p>If the family’s income continues to exceed the applicable over-income limit for a second consecutive year after the initial over-income determination, SLHA will provide the family a notice of lease termination in accordance with the notification requirements in this ACOP.</p> <p>If, at any time, an over-income family experiences a decrease in income during the two-year grace period, the family may request an interim redetermination of income in accordance with PHA policy. If it is determined that the over-income family is now below the over-income limit, the family is no longer subject to over-income provisions as of the effective date of the recertification.</p> <p>The PHA will notify the family in writing that over-income policies no longer apply to them. If the family’s income later exceeds the over-income limit again, the family is entitled to a new twoyear grace period.</p>	<p>has exceeded the over-income limit for twelve (12) months , and that the family may be subject to SLHA’s Over-Income Policy.</p> <p>If the family’s income continues to exceed the applicable over-income limit at the conclusion of the twenty (24) month grace period after the applicable annual or interim reexamination SLHA will provide the family a notice of lease termination in accordance with the notification requirements in this ACOP. SLHA must terminate the tenancy of the over-income family no more than six (6) months after the required notification.</p> <p>If, at any time, an over-income family experiences a decrease in income during the twenty-four (24) month grace period, the family may request an interim reexamination in accordance with this ACOP. If SLHA determines that the over-income family has fallen below the over-income limit at any time during the twenty-four (24) month grace period then the family is no longer subject to the over-income provisions as of the effective date of the reexamination. If the family should exceed the over-income limit again, SLHA will begin a new twenty-four (24) month grace period. SLHA will notify the family in writing that over-income policies no longer apply to them.</p>
<p>Chapter 22</p> <p>22.1 Lease Terminations</p> <p>22.1.2.1 Mandatory Terminations</p>	<ul style="list-style-type: none"> For a “One Strike” violation: Violent criminal activity or drug-related criminal activity on or off the premises, or any criminal activity that threatens the health, safety and welfare of SLHA residents or employees (including management staff) 	<ul style="list-style-type: none"> For a “One Strike” violation: Any criminal activity that threatens the health, safety, or right to peaceful enjoyment of the premises of other residents or employees of the PHA. Any violent or drug-related criminal activity on or off such premises. Any criminal activity that resulted in felony conviction of a household member.

Admissions and Continued Occupancy Policy (ACOP) Changes/Additions 2024

<p>Chapter 22</p> <p>22.1 Lease Terminations</p> <p>22.1.2.2 Serious Violations or Other Good Cause -- Examples</p>	<ul style="list-style-type: none"> Meeting or exceeding the over-income limit 	<ul style="list-style-type: none"> Meeting or exceeding the over-income limit in accordance with SHLA’s policy for Over Income Families. See Section 20.6
<p>Chapter 22</p> <p>22.1 Lease Terminations</p> <p>22.1.2.3 Notice Timing and Requirements</p>	<ul style="list-style-type: none"> 60 days for over-income households 	<ul style="list-style-type: none"> 60 days for over-income households. Refer to SLHA’s policy for Over Income Families in Section 20.6
<p>Chapter 23 Grievance and Appeals</p> <p>23.3 Grievance Procedure for Public Housing Residents</p> <p>23.3.1 Applicability</p>	<p>SLHA excludes from the grievance procedure any grievance concerning a termination of tenancy or eviction that involves:</p> <ul style="list-style-type: none"> Any criminal activity that threatens the health, safety or right to peaceful enjoyment of the premises of other residents or employees of SLHA or its management agents Any violent or drug-related criminal activity on or off the development premises Any criminal activity that resulted in felony conviction of a household member 	<p>Pursuant to the One Strike You’re Out Policy, SLHA excludes from the grievance procedure any grievance concerning a termination of tenancy or eviction that involves:</p> <ul style="list-style-type: none"> Any criminal activity that threatens the health, safety or right to peaceful enjoyment of the premises of other residents or employees of SLHA or its management agents Any violent or drug-related criminal activity on or off the development premises Any criminal activity that resulted in felony conviction of a household member

Admissions and Continued Occupancy Policy (ACOP) Changes/Additions 2024

<p>Chapter 23 Grievance and Appeals</p> <p>23.3 Grievance Procedure for Public Housing Residents</p> <p>23.3.2 Informal Settlement of Grievance</p>	<p>SLHA will accept requests for an informal settlement of a grievance either orally or in writing, to SLHA office within five business days of the grievable event. Within 10 business days of receipt of the request SLHA, through its management agent, will arrange a meeting with the resident at a mutually agreeable time and confirm such meeting in writing to the resident.</p> <p>If a resident fails to attend the scheduled meeting without prior notice, SLHA will reschedule the appointment only if the resident can show good cause for failing to appear, or if it is needed as a reasonable accommodation for a person with disabilities. Good cause is defined as an unavoidable conflict, which seriously affects the health, safety or welfare of the family.</p> <p>SLHA will prepare a summary of the informal settlement within five business days; one copy to be given to the resident and one copy to be retained in SLHA's file. The summary must specify the names of the participants, dates of meeting, the nature of the proposed disposition of the complaint and the specific reasons therefore, and will specify the procedures by which a hearing may be obtained if the complainant is not satisfied.</p>	<p>Any grievance shall be presented, either orally or in writing, to SLHA's office or to the office of the property in which the Resident resides within five (5) business days of the grievable event so that the grievance may be discussed informally and settled without a hearing. Within ten (10) business days of receipt of the request SLHA will arrange a meeting with the resident at a mutually agreeable time and confirm such meeting in writing to the resident.</p> <p>A summary of the informal meeting will be provided to the resident within five (5) business days of the informal meeting. One copy shall be given to the resident and one retained in the resident's file. The summary shall specify the names of the participants, dates of meeting, the nature of the proposed disposition of the complaint and the specific reasons therefor, and shall specify the procedures by which a grievance hearing may be obtained if the resident is not satisfied with the outcome of the informal meeting.</p> <p>If a resident fails to attend the scheduled informal meeting without prior notice, SLHA will reschedule the appointment only if the resident can show good cause for failing to appear, or if it is needed as a reasonable accommodation for a person with disabilities. Good cause is defined as an unavoidable conflict, which seriously affects the health, safety or welfare of the family.</p>
<p>Chapter 23 Grievance and Appeals</p> <p>23.3 Grievance Procedure for Public Housing Residents</p> <p>23.3.3 Procedures to Obtain a Formal Hearing</p>		<p>DELETE [24 CFR 966.55]</p>

Admissions and Continued Occupancy Policy (ACOP) Changes/Additions 2024

<p>Chapter 23 Grievance and Appeals</p> <p>23.3 Grievance Procedure for Public Housing Residents</p> <p>23.3.3 Procedures to Obtain a Formal Hearing</p> <p>23.3.3.1 Requests for Hearing and Failure to Request</p>	<p>Requests for Hearing and Failure to Request [24 CFR 966.55(a), (c), and (d)]</p> <p>All grievances must be presented in accordance with the informal procedures prescribed above as a condition prior to a grievance hearing. However, if the complainant can show good cause for failure to proceed with the informal hearing to the panel, the panel may waive this provision.</p>	<p>Requests for Hearing and Failure to Request</p> <p>Before requesting a formal grievance hearing, the resident must first follow the procedure for the informal settlement meeting prescribed above. However, the formal hearing panel may waive this requirement if the resident can show good cause.</p>
<p>Chapter 23 Grievance and Appeals</p> <p>23.3 Grievance Procedure for Public Housing Residents</p> <p>23.3.3 Procedures to Obtain a Formal Hearing</p> <p>23.3.3.2 Escrow Deposits</p>	<p>Escrow Deposits [24 CFR 966.55(e)]</p> <p>Before a hearing is scheduled in any grievance involving the amount of rent that SLHA claims is due, the complainant must pay an escrow deposit to SLHA. When a complainant is required to make an escrow deposit, the amount is the amount of monthly rent SLHA states is due and payable. After the first deposit, the complainant must deposit the same amount monthly until the complainant’s grievance is resolved by decision of the panel.</p> <p>SLHA will waive the requirement for an escrow deposit where the complainant is grieving the effect of welfare benefits reduction in the calculation of family income or denial of a request for a financial hardship exemption from minimum rent requirements.</p> <p>Unless SLHA waives the requirement, the complainant’s failure to make the escrow deposit will terminate the grievance procedure. A complainant’s failure to pay the escrow deposit does not waive the resident’s right to contest</p>	<p>DELETE</p>

Admissions and Continued Occupancy Policy (ACOP) Changes/Additions 2024

	<p>SLHA's disposition of the grievance in any appropriate judicial proceeding.</p>	
<p>Chapter 23 Grievance and Appeals</p> <p>23.3 Grievance Procedure for Public Housing Residents</p> <p>23.3.3 Procedures to Obtain a Formal Hearing</p> <p>23.3.4 Scheduling of Hearings</p>	<p>Scheduling of Hearings [24 CFR 966.55(f)]</p> <p>If the complainant has complied with all requirements for requesting a hearing as described above, a hearing will be scheduled promptly. A written notification specifying the time, place and the procedures governing the hearing will be mailed to the complainant.</p>	<p>Scheduling of Hearings [24 CFR 966.56(a)]</p> <p>Upon receipt of the resident's hearing request, SLHA will schedule the grievance hearing promptly for a time and place reasonably convenient to both the resident and SLHA. A written notification specifying the time, place, and the procedures governing the hearing will be sent to the resident via U.S. Mail First Class postage pre-paid.</p>
<p>Chapter 24 Community Service</p> <p>24.2 Requirements</p>	<p>An individual may not skip a month and then double up the following month, unless warranted by special circumstances. SLHA will make the determination of whether to permit a deviation from the schedule. Individuals who have special circumstances which they believe will prevent them from completing the required community service hours for a given month must notify SLHA in writing within five business days of the circumstances becoming known. SLHA will review the request and notify the individual, in writing, of its determination within 10 business days. SLHA may require those individuals to provide documentation to support their claim.</p>	<p>The requirement is not restricted to a precise eight hours per month; a resident could comply by performing any amount of hours per month, as long as at least 96 hours are accumulated by their annual certification.</p>

Admissions and Continued Occupancy Policy (ACOP) Changes/Additions 2024

<p>Chapter 24 Community Service</p> <p>24.3. Definitions for Community Service</p> <p>24.3.1 Exempt Individual</p>	<p>An exempt individual is an adult who:</p> <ul style="list-style-type: none"> • Is age 62 years or older • Is blind or disabled (as defined under section 216[i][I] or 1614 of the Social Security Act), and who certifies that because of this disability s/he is unable to comply with the service provisions • Is a primary caretaker of such an individual • Is engaged in work activities (SLHA will consider 20 hours per week as the minimum number of hours needed to qualify for a work activity exemption) • Is able to meet requirements under a state program funded under part A of title IV of the Social Security Act (“Block grants To States for Temporary Assistance for Needy Families”), or under any other welfare-to-work program of the state of Missouri. Including a state-administered welfare-to-work program • Is a member of a family receiving assistance, benefits, or services under a state program funded under part A of title IV of the Social Security Act, or under any other welfare program of the state of Missouri, including a state-administered welfare-to-work program or Supplemental Nutrition Assistance Program (SNAP), and has not been found by the state or other administering entity to be in noncompliance with such program. Supplemental Nutrition Assistance Program (SNAP) qualifies as a welfare program of the state. 	<p>An exempt individual is an adult who:</p> <ul style="list-style-type: none"> • Is age 62 years or older • Is blind or disabled (as defined under section 216[i][I] or 1614 of the Social Security Act), and who certifies that because of this disability s/he is unable to comply with the service provisions • Is a primary caretaker of an individual who is blind or disabled (as defined under section 216[i][I] or 1614 of the Social Security Act), and who certifies that because of this disability s/he is unable to comply with the service provisions • Is engaged in work activities as defined by Section 407(d) of the Social Security Act (42 USC Section 607 (d) for at least twenty (20) hours per week • Is able to meet requirements under a state program funded under part A of title IV of the Social Security Act (“Block grants To States for Temporary Assistance for Needy Families”), or under any other welfare-to-work program of the State of Missouri
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Admissions and Continued Occupancy Policy (ACOP) Changes/Additions 2024

<p>Chapter 24 Community Service</p> <p>24.3 Definitions for Community Service</p> <p>24.3.2 Exempt Family</p>		<p>***ADD NEW SECTION</p> <p>An exempt family is a family in which a member is receiving assistance, benefits, or services under a state program funded under part A of title IV of the Social Security Act, or under any other welfare program of the state of Missouri, including a state-administered welfare-to-work program or Supplemental Nutrition Assistance Program (SNAP), and has not been found by the state or other administering entity to be in noncompliance with such program. Supplemental Nutrition Assistance Program (SNAP) qualifies as a welfare program of the State of Missouri.</p>
<p>Chapter 24 Community Service</p> <p>24.5 Determination of Exemption Status and Compliance</p>	<p>SLHA must review and verify family compliance with service requirements annually at least 30 days before the end of the 12-month lease term. The policy for documentation and verification of compliance with service requirements is set forth below</p>	<p>SLHA must review and verify family compliance with service requirements annually. The policy for documentation and verification of compliance with service requirements is set forth below</p>
<p>Chapter 24 Community Service</p> <p>24.5 Determination of Exemption Status and Compliance</p> <p>24.5.1 Annual Determination</p> <p>24.5.1.2 Determination of Compliance</p>	<p>Approximately 60 days prior to the end of the lease term, SLHA will provide written notice requiring the family to submit documentation that all subject family members have complied with the service requirement. The family will have 10 business days to submit SLHA required documentation form(s).</p>	<p>At least 60 days prior to the end of the lease term, SLHA will provide written notice requiring the family to submit documentation that all subject family members have complied with the service requirement. The family will have 10 business days to submit SLHA required documentation form(s).</p>

Admissions and Continued Occupancy Policy (ACOP) Changes/Additions 2024

<p>Chapter 24 Community Service</p> <p>24.5 Determination of Exemption Status and Compliance</p> <p>24.5.2 Change in Status between Annual Determinations</p> <p>24.5.2.1 Exempt to Nonexempt Status</p>	<p>If an exempt individual becomes nonexempt during the 12-month lease term; it is the family’s responsibility to report this change to SLHA within 30 days from the date the change takes effect. Within 30 days of a family reporting such a change, or SLHA determining such a change is necessary, SLHA will provide a copy of the community service policy, as well as a documentation form on which the family member may record the activities performed and number of hours contributed. The effective date of the community service requirement will be the first of the month following a 30-day notice.</p>	<p>If an exempt individual becomes nonexempt during the 12-month lease term; it the family must report this change to SLHA within thirty (30) days from the date the change takes effect. Within thirty (30) days of a family reporting such a change, or SLHA determining such a change is necessary, SLHA will provide a copy of the community service policy, as well as a documentation form on which the family member may record the activities performed and number of hours contributed. The effective date of the community service requirement will be the first of the month following a 30-day notice.</p>
<p>Chapter 24 Community Service</p> <p>24.5 Determination of Exemption Status and Compliance</p> <p>24.5.2 Change in Status between Annual Determinations</p> <p>24.5.2.2 Nonexempt to Exempt Status</p>	<p>If a nonexempt person becomes exempt during the 12-month lease term, it is the family’s responsibility to report this change to SLHA within 30 days. Any claim of exemption will be verified by SLHA.</p>	<p>If a nonexempt person becomes exempt during the 12-month lease term, it is the family must If a nonexempt person becomes exempt during the 12-month lease term, it is the family’s responsibility to report this change to SLHA within 30 days. Any claim of exemption will be verified by SLHA.</p>

Admissions and Continued Occupancy Policy (ACOP) Changes/Additions 2024

<p>Chapter 24 Community Service</p> <p>24.6 Documentation and Verification</p> <p>24.6.2 Documentation and Verification of Compliance</p>	<p>If anyone in the family is subject to the community service requirement, SLHA will provide the family with community service documentation forms at admission, at lease renewal, when a family member becomes subject to the community service requirement during the lease term, or upon request of the family. Each individual who is subject to the requirement will be required to record their community service or self-sufficiency activities and the number of hours contributed on the required form. The certification form will also include places for signatures and phone numbers of supervisors, instructors, and counselors certifying the number of hours contributed.</p>	<p>If anyone in the family is subject to the community service requirement, SLHA will provide the family with community service documentation forms at admission, at lease renewal, when a family member becomes subject to the community service requirement during the lease term, or upon request of the family. Each individual who is subject to the requirement will be required to record their community service or self-sufficiency activities and the number of hours contributed on the required form. The certification form will also include places for signatures and phone numbers of supervisors, instructors, and counselors certifying the number of hours contributed. Self-certification will not be accepted.</p>
<p>ACOP APPENDIX 2</p> <p>Income Limits</p>		<p>SEE ATTACHMENT</p>
<p>ACOP APPENDIX 3</p> <p>Flat Rent Schedule</p>		<p>SEE ATTACHMENT</p>

COMMENT TO THE FY 2024 AGENCY PLAN
COMMENT #4
(Legal Services of Eastern Missouri)



Daniel K. Glazier
Executive Director and
General Counsel



June 17, 2024

St. Louis Housing Authority
3520 Page Boulevard
St. Louis, Missouri 63106

Sent via in-person comment and submitted to defowler@slha.org.

Re: LSEM Comments on SLHA's FY 2024 Draft Agency Plan

To Whom It May Concern:

We write on behalf of Legal Services of Eastern Missouri (LSEM) to support SLHA's FY 2024 Draft Agency Plan and the changes it proposes. LSEM advances justice by providing legal representation and supportive services to low-income people and families in 21 Missouri counties. We represent clients facing a wide variety of challenges, including homelessness, loss of housing assistance, poor living conditions, discrimination and other housing issues. Assisting our clients in obtaining access to safe, affordable housing is one of our key priorities. LSEM represents low-income tenants to defend them against evictions, and affirmatively to assert their rights to fair housing and habitable living conditions. The changes outlined in SLHA's FY 2024 Draft Agency Plan will positively affect our clients and St. Louis residents through the creation of hardship relief programs and deductions, more equitable waiting list preferences for domestic violence survivors, and better landlord accountability. We commend SLHA for proposing these changes and believe they will affirmatively further access to safe and affordable housing in the St. Louis region for low-income tenants. We urge SLHA to adopt this draft plan for the following reasons:

- Increased financial hardship relief programs and rent deductions for families that qualify—such as elderly and disabled, families with young children, and those with unreimbursed health and medical care expenses—will provide access to affordable housing to people struggling to find safe, quality homes.
- Adding domestic violence survivors to the prioritized waiting list preferences will allow this group better access to housing, decreasing their risk of harm when attempting to exit dangerous and housing-unstable situations.

701 Market Street, Suite 1100, St. Louis, Missouri 63101 • 314.534.4200 • 1.800.444.0514 • www.lsem.org





Daniel K. Glazier
Executive Director and
General Counsel



- Written consent from SLHA prior to executing new HAP contract when a change of ownership of a unit occurs, as well as updated documentation of this change, such as W-9 and proof of ownership will create more transparency, more accountability from landlords, and empower tenants. Misinformation regarding property ownership often confuses tenants and can impact their ability to timely pay rent and contact the property owner or manager. This change will improve tenants' housing stability.
- Including a \$25 fee for reinspection after a failed inspection will incentivize property owners to prioritize keeping properties up to code, safe and habitable for residents. It will also likely make the inspection process more efficient, as landlords will be incentivized to fully prepare a unit prior to seeking inspection.

While we overall support the proposed changes, we have some concern about a move to biennial inspections and suggest SLHA set a threshold score. Properties scoring above that mark can be scheduled for biennial inspections, but those scoring below must have annual inspections until they can improve their properties.

For the aforementioned reasons, LSEM supports SLHA's proposed FY 2024 Draft Agency Plan, while also encouraging SLHA to consider the change outlined above.

Abbie Leonard

Abbie Leonard

Social Worker

Attorney

asleonard@lsem.org

314-860-5153

Lisa J. D'Souza

Lisa J. D'Souza

Hon. R.B. Teitelman Chair/Senior

ljsouza@lsem.org

314-256-8720

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**PUBLIC HEARING/TOWN HALL MEETING
NOTICES**

PUBLIC NOTICE

May 3, 2024

**NOTICE OF PUBLIC HEARING
ST. LOUIS HOUSING AUTHORITY FY 2024 AGENCY PLAN
ADMISSIONS AND CONTINUED OCCUPANCY POLICY
UTILITY ALLOWANCE SCHEDULE
FLAT RENT SCHEDULE
5-YEAR CAPITAL FUND PLAN**

The U.S. Department of Housing and Urban Development (HUD) is providing annual funding to the St. Louis Housing Authority (SLHA) to improve the physical condition and upgrade the management and operation of its Public Housing and Housing Choice Voucher (Section 8) programs. On October 21, 1998, congress enacted a new law, the Quality Housing and Work Responsibility Act (QHWRA) of 1998. Under this new law, to receive the funding, SLHA is required to develop an Annual and Five-Year Agency Plan, in consultation with residents, local government officials, and other interested parties, and to develop and implement the goals, strategies, and priorities identified in the Plan. The annual submission must be submitted to the HUD field office by July 15, 2024.

This Agency Plan is subject to public review and comment. **SLHA is providing a 45-day comment period beginning May 3, 2024 and ending with the Public Hearing on June 17, 2024.** The Plan will be available for viewing at SLHA's Central Office, 3520 Page Blvd. St. Louis, MO 63106 and on its website at <https://www.slha.org/document-center/>. Written comments will be accepted until June 17, 2024 and will become a part of the public record. Contact Deborah Fowler, Administrative Assistant, at (314) 286-4356 between the hours of 8:00 a.m. and 4:00 p.m. Monday through Friday or defowler@slha.org to schedule an appointment to view the Agency Plan, Admissions and Continued Occupancy Policy and/or the Utility Allowance and Flat Rent Schedules.

Additionally, **revisions to the Admissions and Continued Occupancy Policy (ACOP)**, a component of the Agency Plan, have been made and therefore, are subject to public review and comment. The draft ACOP will be available concurrently with the draft of the Agency Plan.

SLHA's Utility Allowance and the Flat Rent Schedules will be revised and are subject to public review and comment. The proposed Schedules will be available concurrently with the draft of the Agency Plan.

Also, effective November 25, 2013, the Capital Fund Program Final Rule was implemented to decouple the Capital Fund Annual Submission from the Agency Plan. This annual submission will be subject to public review; therefore, **the Five-Year Action Plan (FY 2024 –FY 2028)** is simultaneously being made available concurrently with the draft of the Agency Plan.

SLHA will hold the Public Hearing on Monday, June 17, 2024, at 3:00 p.m. at its Central Office to discuss and accept comments on the Agency Plan, ACOP, Utility Allowance and Flat Rent Schedules and the Capital Fund Program. All parties that wish to speak at the Public Hearing must abide by SLHA's Speaker's Policy. A copy of the policy is available at SLHA's Central Office.

The public is invited to attend this meeting to provide comments on the proposed Agency Plan. Upon reasonable notice, SLHA will make efforts to accommodate the needs of individuals with disabilities through sign language interpreters or other auxiliary aids. For additional information or assistance, please contact Deborah Fowler by email at defowler@slha.org or by telephone at (314) 286-4356 or TDD (314) 286-4223.

The St. Louis Housing Authority

By: Latasha Barnes, Acting Executive Director



PUBLIC NOTICE

May 3, 2024

**NOTICE OF VIRTUAL TOWN HALL MEETING
ST. LOUIS HOUSING AUTHORITY FY 2024 AGENCY PLAN
ADMISSIONS AND CONTINUED OCCUPANCY POLICY
UTILITY ALLOWANCE SCHEDULE
FLAT RENT SCHEDULE
5-YEAR CAPITAL FUND PLAN**

***For:* ALL SLHA Residents**

***When:* Wednesday May 22, 2024 @ 3:00 p.m.**

The St. Louis Housing Authority's (SLHA) Planning Team met with the St. Louis Tenant Affairs Board (STLTAB) and outlined their needs and concerns for the preparation of the Annual Submission of the Agency Plan for FY 2024. The "Draft" Agency Plan has been prepared and is currently out for public review and comment period for 45 days. You may review the plan on SLHA's website, <https://www.slha.org/document-center/> or at your Management Office or TAB Office. SLHA has scheduled a Virtual Town Hall type meeting within this 45-day comment period to achieve greater resident input relative to the draft plan. The 45-day comment period ends on June 17, 2024 at the Public Hearing.

Instruction to Attend Town Hall Meeting

Instructions to join the virtual Town Hall Meeting are posted on SLHA's website, <https://www.slha.org/document-center/>. Comments and suggestions received will become part of the public record.

If you have any questions or require more information, please contact Deborah Fowler by email at defowler@slha.org or leave a message at (314) 286-4356 at least two (2) days prior to the meeting.



Certification of Compliance

**Certifications of Compliance with
PHA Plan and Related Regulations
(Standard, Troubled, HCV-Only, and
High Performer PHAs)**

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2024

**PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations
including PHA Plan Elements that Have Changed**

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the ____ 5-Year and/or X Annual PHA Plan, hereinafter referred to as "the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the PHA fiscal year beginning 2024, in connection with the submission of the Plan and implementation thereof:

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located (24 CFR § 91.2).
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments (AI) to Fair Housing Choice, or Assessment of Fair Housing (AFH) when applicable, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan (24 CFR §§ 91.2, 91.225, 91.325, and 91.425).
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the RAB (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
4. The PHA provides assurance as part of this certification that:
 - (i) The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
 - (ii) The changes were duly approved by the PHA Board of Directors (or similar governing body); and
 - (iii) The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.
5. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
6. The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), title II of the Americans with Disabilities Act (42 U.S.C. 12101 et seq.), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program.
7. The PHA will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR § 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR § 903.7(o)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintains records reflecting these analyses and actions.
8. For PHA Plans that include a policy for site-based waiting lists:
 - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2011-65);

- The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
 - Adoption of a site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
 - The PHA shall take reasonable measures to assure that such a waiting list is consistent with affirmatively furthering fair housing; and
 - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR 903.7(o)(1).
9. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
 10. In accordance with 24 CFR § 5.105(a)(2), HUD's Equal Access Rule, the PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
 11. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
 12. The PHA will comply with the requirements of Section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
 13. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
 14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
 15. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
 16. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
 17. The PHA will keep records in accordance with 2 CFR 200.333 and facilitate an effective audit to determine compliance with program requirements.
 18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
 19. The PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Financial Assistance, including but not limited to submitting the assurances required under 24 CFR §§ 1.5, 3.115, 8.50, and 107.25 by submitting an SF-424, including the required assurances in SF-424B or D, as applicable.
 20. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
 21. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
 22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

St. Louis Housing Authority (SLHA)
 PHA Name

MO001
 PHA Number/HA Code

Annual PHA Plan for Fiscal Year 2024

5-Year PHA Plan for Fiscal Years 20____ - 20____

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).

Name of Acting Executive Director		Name Board Chairman	
Latasha Barnes		Sal Martinez	
Signature	Date 7/15/2024	Signature	Date 7/15/2024

The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. This information is collected to ensure compliance with PHA Plan, Civil Rights, and related laws and regulations including PHA plan elements that have changed.

Public reporting burden for this information collection is estimated to average 0.16 hours per year per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Civil Rights Certification

Civil Rights Certification
(Qualified PHAs)

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB Approval No. 2577-0226
Expires 3/31/2024

Civil Rights Certification

Annual Certification and Board Resolution

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the 5-Year PHA Plan, hereinafter referred to as "the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the fiscal year beginning 2024 in which the PHA receives assistance under 42 U.S.C. 1437f and/or 1437g in connection with the mission, goals, and objectives of the public housing agency and implementation thereof:

The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d—4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), title II of the Americans with Disabilities Act (42 U.S.C. 12101 *et seq.*), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program. The PHA will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR § 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR § 903.7(o)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction’s initiatives to affirmatively further fair housing that require the PHA’s involvement; and maintains records reflecting these analyses and actions.

St. Louis Housing Authority
PHA Name

MO001
PHA Number/HA Code

I hereby certify that all the statement above, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Acting Executive Director:		Name of Board Chairperson:	
Latasha Barnes		Sal Martinez	
Signature	Date	Signature	Date

The United States Department of Housing and Urban Development is authorized to collect the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 *et seq.*, and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. The information is collected to ensure that PHAs carry out applicable civil rights requirements.

Public reporting burden for this information collection is estimated to average 0.16 hours per response, including the time for reviewing instructions, searching existing data sources, gathering, and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Certification by State or Local Official

**Certification by State or Local
 Official of PHA Plans Consistency
 with the Consolidated Plan or
 State Consolidated Plan
 (All PHAs)**

U. S Department of Housing and Urban Development

Office of Public and Indian Housing

OMB No. 2577-0226

Expires 3/31/2024

**Certification by State or Local Official of PHA Plans
 Consistency with the Consolidated Plan or State Consolidated Plan**

I, Nahuel Fefer, the Executive Director, CDA
Official's Name *Official's Title*

certify that the 5-Year PHA Plan for fiscal years _____ and/or Annual PHA Plan for fiscal year
2024 of the St. Louis Housing Authority is consistent with the Consolidated Plan or
PHA Name

State Consolidated Plan including the Analysis of Impediments (AI) to Fair Housing Choice or
 Assessment of Fair Housing (AFH) as applicable to the

The City of St. Louis Missouri

Local Jurisdiction Name

pursuant to 24 CFR Part 91 and 24 CFR § 903.15.

Provide a description of how the PHA Plan's contents are consistent with the Consolidated Plan or State
 Consolidated Plan.

The St. Louis Housing Authority's (SLHA) Fiscal Year 2024 Agency Plan (Annual Plan) is consistent
 with the City of St. Louis's (City) Consolidated Plan because its business strategies are aligned to
 provide programs that benefit the very-low and low-to-moderate income households in the City. SLHA
 and the City strive to accomplish this through the prevention or elimination of neighborhood blight and
 by provide safe, decent, affordable housing choices throughout the community. The SLHA and the
 City continue to pursue and invest in opportunities for mixed-financed partnerships with private
 developers, investors and community residents to develop affordable housing choices to improve the
 quality and energy efficiency of housing in the jurisdiction.

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will
 prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official: Nahuel Fefer

Name of Board Chairperson: Sal Martinez

Signature:

Date:

Signature:

Date:

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

Public reporting burden for this information collection is estimated to average 0.16 hours per year per response, including the time for reviewing
 instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD
 may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

RESOLUTION No. 3009



Asset Management Department

3520 Page Blvd. ■ St. Louis, MO 63106 ■ p 314.531-4770 ■ f 314.531.0184 ■ tdd 314.286.4223 ■ www.slha.org

MEMORANDUM

To: Board of Commissioners

Through: Latasha K. Barnes, Acting Executive Director

From: Paul Werner, Director of Operations for Public Housing

Date: June 12, 2024

Subject: Resolution No. 3009
Authorizing and Approving Revisions to the St. Louis Housing Authority's Admissions and Continued Occupancy Policy (ACOP)

Board approval is requested for revisions to the St. Louis Housing Authority's Admissions and Continued Occupancy Policy (ACOP). In accordance with 24 CFR Sec. 960, Public Housing Authorities must adopt written policies concerning the Admissions to and Occupancy of Public Housing. Revisions to the ACOP include the following:

1. Adopting HUD issued income limits;
2. Adopting new flat rent schedule; and
3. Adopting changes to the ACOP as detailed in the attached matrix.

For 2024, the HUD-issued Income Limits include a new Over-Income Limit (120% of the Median Family Income). This new income limit is related to the HOTMA changes also included in this year's matrix of ACOP changes.

The draft revisions to the ACOP were submitted for public review for 45 days, concurrent with the Agency Plan. The comments and responses from the public review are attached.

**Authorizing and Approving Revisions to the St. Louis Housing Authority's
Admissions and Continued Occupancy Policy (ACOP)**

WHEREAS, the St. Louis Housing Authority (SLHA) desires to revise its Admissions and Continued Occupancy Policy (ACOP) to provide additions, clarifications and changes in accordance with Federal regulations with the U.S. Housing Act of 1937; and

WHEREAS, the revisions to the ACOP have been prepared in accordance with the requirements of 24 CFR Part 903, 960 and 966; and

WHEREAS, SLHA has presented the proposed revisions of the ACOP at resident planning meetings held in conjunction with the preparation of the Agency Plan; and

WHEREAS, SLHA has presented the proposed revisions of the ACOP to the St. Louis Tenant Affairs Board in conjunction with the preparation of the Agency Plan; and

WHEREAS, SLHA has published notices and made the revisions to the ACOP available for inspection and public comment for a period of 45 days prior to the Public Hearing; and

WHEREAS, SLHA conducted a Public Hearing on June 17, 2024 to obtain public comments regarding the revisions to the ACOP; and

WHEREAS, the comments received regarding the revisions to the ACOP are attached; and

WHEREAS, SLHA has considered all comments and recommendations received and has incorporated all relevant changes to the proposed ACOP.

NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF COMMISSIONERS OF THE ST. LOUIS HOUSING AUTHORITY THAT:

1. The revised St. Louis Housing Authority's Admissions and Continued Occupancy Policy (ACOP) is hereby adopted and approved.
2. The Executive Director is hereby directed to take all actions necessary to implement the revisions to the ACOP.

Admissions and Continued Occupancy Policy (ACOP) Changes/Additions 2024

Chapter	Current	Change/Addition/Comment
<p>Chater 4 Program Administration</p> <p>4.5 Record Keeping</p> <p>4.5.4 Privacy Act Requirements</p>	<p>Applicants and residents, including all adults in the household, are required to sign a consent form, HUD-9886, Authorization for Release of Information.</p>	<p>Applicants and residents, including all adults in the household, are required to sign a consent form, HUD-9886-A, Authorization for Release of Information.</p>
<p>Chapter 6 Tenant Selection</p> <p>6.5 Waiting List Preferences</p>	<p>SLHA has established a preference system for admission to its public housing program. SLHA uses the following local preference system:</p> <ul style="list-style-type: none"> • Employed, elderly or disabled • Enrolled in or recently graduated from a job training or educational program • Homeless • Veteran 	<p>SLHA has established a preference system for admission to its public housing program. SLHA uses the following local preference system:</p> <ul style="list-style-type: none"> • Employed, elderly or disabled • Enrolled in or recently graduated from a job training or educational program • Homeless • Veteran • Victims of Domestic Violence
<p>Chapter 6 Tenant Selection</p> <p>6.5 Waiting List Preferences</p> <p>6.5.1 Employed, Elderly, Disabled, Veteran or Homeless Preference</p>	<p>Employed, Elderly, Disabled, Veteran or Homeless Preference</p>	<p><u>***Revise Section numbering to create three subsections. No other changes to this section</u></p> <p>6.5.1 Employed, Elderly, Disabled, Preference</p> <p>6.5.2 Veteran Prefrence</p> <p>6.5.3 Homeless Preference</p>

Admissions and Continued Occupancy Policy (ACOP) Changes/Additions 2024

<p>Chapter 6 Tenant Selection</p> <p>6.5 Waiting List Preferences</p> <p>6.5.4 Victims of Domestic Violence Preference</p>		<p>***ADD NEW SECTION/PREFERENCE</p> <p>Victims of Domestic Violence Preference</p> <p>To qualify for this preference, an applicant must present evidence that the family has been displaced as a result of fleeing violence in the home. Families are also eligible for this preference if there is proof that the family is currently living in a situation where they are being subjected to or victimized by violence in the home. Suitable evidence can be provided from law enforcement officials or social service agencies that have adequate knowledge of the family's living situation</p>
<p>Chapter 6 Tenant Selection</p> <p>6.6 Order of Selection</p>	<p>Pt. Value Assigned - Criteria</p> <p>20 - Employed, Elderly or Disabled</p> <p>15 - Enrolled in or recently graduated from a job training or educational program</p> <p>5 - Homeless</p> <p>5 - A veteran</p>	<p>Pt. Value Assigned - Criteria</p> <p>20 - Employed, Elderly or Disabled</p> <p>15 - Enrolled in or recently graduated from a job training or educational program</p> <p>5 - Homeless</p> <p>5 - A veteran</p> <p>10 – Victims of domestic violence</p>
<p>Chapter 6 Tenant Selectin</p> <p>6.7 Verification of Local Preference</p>		<p>***ADD TO CURRENT SECTION</p> <p>If, during the course of processing an application, it becomes evident that an applicant has falsified or otherwise misrepresented any facts about his/her current situation, history, or behavior in a way that affects eligibility, preferences, applicant selection criteria qualification, allowances, or rent, the application must be rejected.</p>

Admissions and Continued Occupancy Policy (ACOP) Changes/Additions 2024

<p>Chapter 7 General Verification Requirements</p> <p>7.2 Methods of Income and Adjustments to Income Verification</p> <p>7.2.3 EIV Verification</p>	<p>EIV is the verification of income, before or during a family re-examination and after move-in, through an independent source that systematically and uniformly maintains income information in computerized form for a large number of individuals. Users are allowed to search for income records by head of household social security number, program type and/or by annual reexamination. The use of EIV is the mandatory income verification method if the information is available on the system.</p>	<p>SLHA must use HUD’s Enterprise Income Verification (EIV) System to employment and income information at annual and streamlined reexaminations of family composition and income. Users are allowed to search for income records by head of household social security number, program type and/or by annual re-examination. The use of EIV is the mandatory income verification method if the information is available on the system.</p> <p>SLHA is required to use the following reports from the EIV System:</p> <ul style="list-style-type: none"> • Debts Owed & Termination, • Deceased Tenants, • Existing Tenant Search, • Failed EIV Pre-Screening, • Failed SSI Identity Test, • Identity Verification, • Multiple Subsidy, • New Hires, No Income Report by HHA or SSA, • No Income Reported on 50058, • Summary of Household Information
<p>Chapter 8 Eligibility for Admissions</p> <p>8.5 Eligibility Restrictions Due to Family Assets [CFR 5.618(a), 24 CFR 5.618(a)(ii)]</p>	<p>DRAFT</p>	<p>***ADD NEW SECTION</p> <p>Eligibility Restrictions Due to Family Assets [CFR 5.618(a), 24 CFR 5.618(a)(ii)]</p> <p>Families are ineligible to receive assistance in the public housing program if their net family assets exceed \$100,000 or if the family owns real property suitable for the family to live in.</p> <p>A family cannot receive benefits if they have “present ownership interest in, a legal right to reside in, and the effective legal authority to sell, based on state or local laws of the jurisdiction where the property is located, real property that is suitable for occupancy by the family as a residence.”</p>

Admissions and Continued Occupancy Policy (ACOP) Changes/Additions 2024

		<p>The restriction on owning real property does not apply to:</p> <ul style="list-style-type: none"> • Property jointly owned with someone else, and occupied by the other owner who is not a member of the household receiving benefits. • A victim of domestic violence, dating violence, sexual assault, or stalking. • A family that is offering the property for sale <p>A family that owns a property may show it is not “suitable for occupancy” if it:</p> <ul style="list-style-type: none"> • Does not meet the disability-related needs for all members of the family. For example: physical needs, proximity to transit, need for additional bedrooms or space, etc. • Is not sufficient for the size of the family. • Is located so as to be a hardship for the family. For example: the location would be a hardship for the family’s commute to work or school • Is unsafe because of physical condition—unless issues can be “easily remedied” • Cannot be a residence per local or state laws. For example: a storefront zoned for commercial use only
<p>Chapter 8 Eligibility for Admissions</p> <p>8.6 Social Security Numbers [24 CFR 5.216 and 5.218]</p>	<p>Social Security Numbers [24 CFR 5.216 and 5.218]</p>	<p>Social Security Numbers [24 CFR 5.216 and 5.218, 24 CFR 5.216(g)(1)]</p> <p>***ADD TO CURRENT SECTION</p> <p>SLHA requires that each family member (excepting non-eligible family members in mixed families) provide their Social Security number (SSN) and proof that the SSN belongs to that person. If a member of the family is unable to provide a Social Security card or other evidence of their SSN, SLHA will accept a document stating the person’s name and a declaration from the person stating 1) why they cannot obtain their Social Security card and 2) what their SSN is. If SLHA has accepted any declarations as evidence of a SSN, SLHA will review HUD’s Enterprise Income Verification’s (EIV) Failed SSA Identity Report monthly to quickly identify any participants whose identity is not verified.</p>

Admissions and Continued Occupancy Policy (ACOP) Changes/Additions 2024

<p>Chapter 8 Eligibility for Admissions</p> <p>8.7 Family Consent to Release Information</p>	<p>Family Consent to Release of Information [24 CFR 5.230]</p> <p>Each adult family member, and the head of household, spouse, life partner, or co-head, regardless of age, must sign form HUD-9886-A, Authorization for the Release of Information/Privacy Act Notice, and other consent forms as needed to collect information relevant to the family's eligibility and level of assistance. SLHA's managing agent will deny admission to the program if any member of the applicant family fails to sign and submit the consent forms for obtaining information</p>	<p>Family Consent to Release of Information [24 CFR 5.230]</p> <p>Each adult family member, and the head of household, spouse, life partner, or co-head, regardless of age, must sign form HUD-9886-A, Authorization for the Release of Information/Privacy Act Notice, and other consent forms as needed to collect information relevant to the family's eligibility and level of assistance. SLHA's managing agent will deny admission to the program if any member of the applicant family fails to sign and submit the consent forms for obtaining information. At each annual or interim reexamination, if any family member turned 18 and has not yet signed the HUD-9886-A form they will be required to sign the HUD-9886-A form.</p> <p>The executed consent form (Form HUD-9886) will remain effective until the family is denied assistance, the assistance is terminated, or if the family provides written notification to the SLHA to revoke consent. Families have the right to revoke consent by notice to SLHA, however, revoking consent will result in termination or denial of assistance.</p>
<p>Chapter 11 Income Determination</p> <p>11.2 Anticipating Annual Income</p> <p>11.2.2 Basis of Annual Income Projection</p>	<p>Basis of Annual Income Projection</p>	<p>Basis of Annual Income Projection [24 CFR 5.609(c)]</p> <p>***ADD TO CURRENT SECTION</p> <p>For initial occupancy and interim reexaminations, SLHA must estimate the family income for the previous 12-month period using period using current income. For all annual reexaminations, SLHA must determine the family income for the previous 12-months, taking into account any redetermination for an interim reexamination and any accounted for income changes.</p> <p>SLHA will not be considered out of compliance for a "de minimis" error that results in a difference in the determination of a family's adjusted income \$30 or less per month (or \$360 in annual adjusted income)</p>

Admissions and Continued Occupancy Policy (ACOP) Changes/Additions 2024

<p>Chapter 11 Income Determination</p> <p>11.3 Income Included in Annual Income</p>	<p>Income Included in Annual Income</p>	<p>Income Included in Annual Income [24 CFR 5.609(a)]</p> <p>***ADD TO CURRENT SECTION</p> <p>Annual income includes, with respect to the family:</p> <ul style="list-style-type: none"> • All amounts, not specifically excluded, received from all sources by each member of the family 18 years or older, plus • Unearned income by or on behalf of each dependent who is under 18 years of age, and • Imputed returns on net family assets exceeding \$50,000 (adjusted annually using the Consumer Price Index) when the value of the actual returns from a given asset cannot be calculated. Imputed returns are based on the current passbook savings rate, as determined by HUD.
<p>Chapter 11 Income Determination</p> <p>11.3 Income Include in Annual Income</p> <p>11.3.4 Assets</p>	<p>Assets</p> <p>Annual income includes the interest, dividends and other net income of any kind from real or personal property. For most types of assets, SLHA will determine the value of the asset in order to compute income from the asset. As is true for all sources of income, SLHA will use other than current circumstances to anticipate income when an imminent change in circumstances is expected, it is not feasible to anticipate a level of income over 12 months, or SLHA believes that past income is the best indicator of anticipated income. For example, if a family member owns real property that typically receives rental income but the property is currently vacant, SLHA can take into consideration past rental income along with the prospects of obtaining a new tenant. Anytime current circumstances are not used to determine asset income, a clear rationale for the decision will be documented in the file. The family may present information and documentation to SLHA to show why the asset income determination does not represent the family's anticipated asset income.</p>	<p>Assets [24 CFR 5.603(b) "Net Family Assets" Para. (1), (3) and (4), 24 CFR 5.618(b)]</p> <p>Annual income includes the interest, dividends and other net income of any kind from real or personal property. Net family assets include the net cash value of all assets owned by the family, after deducting reasonable costs that would be incurred in disposing of real property, savings, stocks, bonds, and other forms of capital investment. For most types of assets, SLHA will determine the value of the asset in order to compute income from the asset. As is true for all sources of income, SLHA will use other than current circumstances to anticipate income when an imminent change in circumstances is expected, it is not feasible to anticipate a level of income over 12 months, or SLHA believes that past income is the best indicator of anticipated income. For example, if a family member owns real property that typically receives rental income but the property is currently vacant, SLHA can take into consideration past rental income along with the prospects of obtaining a new tenant. Anytime current circumstances are not used to determine asset income, a clear rationale for the decision will be documented in the file. The</p>

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		<p>family may present information and documentation to SLHA to show why the asset income determination does not represent the family's anticipated asset income.</p> <p>For documentation of net family assets under \$50,000, the SLHA may accept self-certification from the family that the assets are under that amount.</p> <ul style="list-style-type: none"> • Certification must include any expected income from the assets (actual returns only). • No further documentation is required by the SLHA for the net family asset restriction. • Assets must be verified every 3 years. <p>For documentation of property ownership, SLHA may accept self-certification that the "family does not have any present ownership interest in any real property." If family declares a property and asks for an exemption because a family member is a victim of domestic violence, dating violence, sexual assault, or stalking:</p> <ul style="list-style-type: none"> • SLHA must accept self-certification of the family member • SLHA will provide the family member with Form HUD 5380 Notice of Occupancy Rights under VAWA and Form HUD 5382 Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking, and Alternate Documentation
<p>Chapter 11 Income Determination</p> <p>11.3.4.2 Income Excluded from Annual Income</p> <p>11.4.2 Lump-Sum Receipts</p>		<p>***ADD TO CURRENT SECTION</p> <p>Several types of lump-sum payment are specifically excluded from net family assets:</p> <ul style="list-style-type: none"> • Any amounts recovered in any civil action or settlement based on a claim of malpractice, negligence, or other breach of duty owed to a family member, for an incident resulting in a disability • Federal tax refunds or refundable tax credits for a period of 12 months after receipt by the family

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<p>Chapter 11 Income Determination</p> <p>11.3 Income Include in Annual Income</p> <p>11.3.4 Assets</p> <p>11.3.4.3.Imputing Income from Assets</p>	<p>Imputing Income from Assets</p> <p>When net family assets are \$5,000 or less, SLHA will include in annual income the actual income anticipated to be derived from the assets. When the family has net family assets in excess of \$5,000, SLHA will include in annual income the greater of the actual income derived from the assets or the imputed income. Imputed income from assets is calculated by multiplying the total cash value of all family assets by the current HUD established passbook savings rate.</p>	<p>Imputing Income from Assets [24 CFR 5.609(a)]</p> <p>In general, income from assets is considered income. If it is possible to determine the actual returns from an asset, SLHA should use that amount. If it is not possible to calculate an actual return on an asset, and:</p> <ul style="list-style-type: none"> • the net family assets are \$50,000 or less, the imputed income from that asset is excluded. • If the net family assets are over \$50,000, SLHA will impute income for the asset based on the current passbook savings rate, as determined by HUD.
<p>Chapter 11 Income Determination</p> <p>11.3 Income Include in Annual Income</p> <p>11.3.4 Assets</p> <p>11.3.4.8.1 Checking and Savings Accounts</p>		<p>***ADD TO CURRENT SECTION</p> <p>The value of retirement accounts recognized by the IRS (IE: IRA, 401(k), 401(b) and retirement plans for self-employed individuals) Family Self-Sufficiency (FSS) Accounts (FSS)Retirement, and the value of certain education or disability support savings accounts is excluded from net family income.</p>
<p>Chapter 11 Income Determination</p> <p>11.3 Income Include in Annual Income</p> <p>11.3.4 Assets</p>		<p>***ADD TO CURRENT SECTION</p> <p>There are several exclusions where the value of the real property does not count towards net family assets</p> <ul style="list-style-type: none"> • Real property that the family does not have the effective legal authority to sell in the jurisdiction in which the property is located (IE: property subject to a lawsuit may be legally restricted from sale) • Real property where the family has interest in land held in trust by Bureau of Indian Affairs • Real property where the family has equity in a manufactured home where the family receives assistance under 24 CFR 982 HCV

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<p>Chapter 11 Income Determination</p> <p>11.3 Income Include in Annual Income</p> <p>11.3.4 Assets</p> <p>11.3.4.8.3 Equity in Real Property or Other Capital Investments</p>		<ul style="list-style-type: none"> • Real property where the family receives assistance under 24 CFR 982 (HCV homeownership participant)
<p>Chapter 11 Income Determination</p> <p>11.3 Income Include in Annual Income</p> <p>11.3.4 Assets</p> <p>11.3.4.9.2 Non-Revocable Trusts</p>	<p>In cases where a trust is not revocable by, or under the control of, any member of a family, the value of the trust fund is not considered an asset. Non-revocable trusts are excluded from net family assets. However, any income distributed to the family from such a trust is counted as a periodic payment or a lump-sum receipt, as appropriate.</p>	<p>In cases where a trust is not revocable by, or under the control of, any member of a family, the value of the trust fund is not considered an asset. Non-revocable trusts are excluded from net family assets. However, any income distributed to the family from such a trust is counted as a periodic payment or a lump-sum receipt, as appropriate.</p>
<p>Chapter 11 Income Determination</p> <p>11.3 Income Include in Annual Income</p> <p>11.3.4 Assets</p> <p>11.3.4.10 Retirement</p>	<p>In order to correctly include or exclude as an asset any amount held in a company retirement or pension account by an employed person, SLHA must know whether the money is accessible before retirement. While a family member is employed, only the amount the family member can withdraw without retiring or terminating employment is counted as an asset. After a family member retires or terminates employment, any amount distributed to the family member is counted as a periodic payment or a lumpsum receipt, as appropriate, except to the extent that it represents funds invested in the account by the family member. The balance in</p>	<p>Retirement account recognized by IRS IRA, 401(k), 401(b) and retirement plans for self-employed individuals are excluded from net family assets.</p>

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<p>Accounts</p>	<p>the account is counted as an asset only if it remains accessible to the family member. IRA, Keogh and similar retirement savings accounts are counted as assets even though early withdrawal would result in a penalty.</p>	
<p>Chapter 11 Income Determination</p> <p>11.3 Income Include in Annual Income</p> <p>11.3.4 Assets</p> <p>11.3.4.11 Personal Property</p>	<p>Personal property held as an investment, such as gems, coin collections, antique cars, etc., is considered an asset. In determining the value of personal property held as an investment, SLHA will use the family's estimate of the value. Generally, personal property held as an investment generates no income until it is disposed of. If regular income is generated (e.g., income from renting the personal property), the amount that is expected to be earned in the coming year is counted as actual income from the asset. Necessary items of personal property are not considered assets and are excluded from net family assets provided the combined total value does not exceed \$50,000. Necessary personal property consists of only those items not held as an investment, and may include clothing, furniture, household furnishings, jewelry and vehicles, including those specially equipped for persons with disabilities.</p>	<p>Personal property held as an investment, such as gems, coin collections, antique cars, etc., is considered an asset. In determining the value of personal property held as an investment, SLHA will use the family's estimate of the value. Generally, personal property held as an investment generates no income until it is disposed of. If regular income is generated (e.g., income from renting the personal property), the amount that is expected to be earned in the coming year is counted as actual income from the asset. Necessary items of personal property are not considered assets and are excluded from net family assets provided the combined total value does not exceed \$50,000. Necessary personal property consists of only those items not held as an investment, and may include clothing, furniture, household furnishings, jewelry and vehicles, including those specially equipped for persons with disabilities.</p>

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<p>Chapter 11 Income Determination</p> <p>11.4 Income Excluded for Annual Income</p> <p>11.4.1 Non-Recurring Income</p>	<p>Temporary, Nonrecurring, or Sporadic Income</p> <p>Temporary, nonrecurring or sporadic income is not included in annual income. Sporadic income is income that is not received periodically and cannot be reliably predicted. For example, the income of an individual who works occasionally as a handyman would be considered sporadic if future work could not be anticipated and no historic, stable pattern of income existed. Sporadic income includes temporary payments from the U.S. Census Bureau for employment lasting no longer than 180 days</p>	<p>Non-Recurring Income</p> <p>Non-recurring income is income that will not be repeated in the coming year based on information provided by the family. Some examples of non-recurring income include:</p> <ul style="list-style-type: none"> • U.S. Census Bureau for employment income (relating to decennial census or the American Community Survey) lasting no longer than 180 days and not resulting in permanent employment. • Direct federal or state payments for economic stimulus or recovery. • State or federal refundable tax credits or state or federal tax refunds received directly at the time they are received directly by the family. • Gifts for significant life events or milestones (e.g., holidays, birthdays, wedding gifts, baby showers, anniversaries). • Non-monetary, in-kind donations, such as food, clothing, or toiletries, received from a food bank or similar organization. • Lump-sum additions to net family assets, including but not limited to lottery or other contest winnings <p>Income received as an independent contractor, day laborer, or seasonal worker is NOT excluded from income, even if the source, date, or amount of the income varies.</p>
<p>Chapter 11 Income Determination</p> <p>11.4 Income Excluded for Annual Income</p> <p>11.4.2 Children's Earnings</p>	<p>Children's Earnings</p> <p>Employment income earned by children (including foster children) under the age of 18 years is not included in annual income.</p>	<p>Minors Earned Income [24 CFR 5.609(b)(3)]</p> <p>Employment income earned by children (including foster children) under the age of 18 years is not included in annual income.</p>

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<p>Chapter 11 Income Determination</p> <p>11.4 Income Excluded for Annual Income</p> <p>11.4.3 Certain Earned Income of Full-Time</p>	<p>Certain Earned Income of Full-Time Students</p> <p>Students Earnings in excess of \$480 for each full-time student 18 years old or older (except for the head, spouse, life partner or co-head) are not counted. To be considered “full-time,” a student must be considered “full-time” by an educational institution with a degree or certificate program. Any student financial assistance not subject to inclusion is fully excluded from annual income, whether it is paid directly to the student or to the educational institution the student is attending.</p>	<p>Certain Earned Income for full-time dependent students and financial aid for both full and part-time student</p> <p>11.4.3.1 Mandatory Deduction for Full-time Students 24 CFR 5.609(b)(14)</p> <p>Earnings in excess of \$480 for each full-time student 18 years old or older (except for the head, spouse, life partner or co-head) are not counted. To be considered “full-time,” a student must be considered “full-time by an educational institution with a degree or certificate program. The above deduction is for 2024 and subject to change as HUD generally revises the amount on annual basis. The latest amount, as established and approved by HUD, shall be applicable and is automatically incorporated into this policy as of the effective date of the newly established amount.</p> <p>11.4.3.2 Educational Savings Account 24 CFR 5.609(b)(10)</p> <p>Any amount in or from, or any benefits, income, or distributions from, any Coverdell educational savings account of or any qualified tuition program under IRS sections 529 and 530 shall be excluded from income</p> <p>11.4.3.3 Student Financial Assistance 24 CFR 5.609(b)(9)</p> <p>Any other grant-in-aid, scholarship, or other assistance amounts an individual receives for the actual covered costs charged by the institute of higher education is excluded from a family’s income. Exclusion applies equally to full and part-time students.</p> <p>11.4.3.4 Title IV HEA Assistance 24 CFR 5.609(b)(9)(i)</p> <p>Any assistance under section 479B of the Higher Education Act of 1965, as amended, requires to be excluded from a family’s income, referred to here as, “Title IV HEA Assistance.” Title IV HEA Assistance includes, but is not limited to:</p> <ul style="list-style-type: none"> • Bureau of Indian Affairs/ Education student assistance programs. Current examples include: The Higher Education Tribal Grant,
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		<p>and The Tribally Controlled Colleges or Universities Grant Program.</p> <ul style="list-style-type: none">• Federal Pell Grants• Teach Grants• Federal Work-Study Programs• Federal Perkins Loans• Income earned in employment and training programs under section 134 of the Workforce Innovation and Opportunity Act (WIOA), including: workforce investment activities for adults and workers dislocated as a result of permanent closure or mass layoff at a plant, facility, or enterprise, or a natural or other disaster that results in mass job dislocation, in order to assist such adults or workers in obtaining reemployment as soon as possible.• All assistance under Title IV of the HEA as well as Bureau of Indian Affairs student financial assistance, even assistance provided to students in excess of tuition and required fees or charges, is excluded from HUD income calculations. <p>11.4.3.5 Other Student Financial Assistance 24 CFR 5.609(b)(9)(ii)</p> <p>Other assistance, for both full and part-time students, that is not included under Title IV of the HEA or under Bureau of Indian Affairs student assistance programs. To qualify as excluded student financial assistance under this category, the aid must be:</p> <ul style="list-style-type: none">• Used for “actual covered costs”• Expressly to assist the student with the costs of higher education;• Expressly to assist a student who is not the head of household or spouse, with the reasonable and actual costs of housing while attending the institution of higher education and not residing in an assisted unit;• A grant or scholarship received from the federal government, a State, Tribe, or local government; or a private foundation registered as a nonprofit under 26 U.S.C. 501(c)(3); a business entity (such as corporation, general partnership, limited liability company, limited partnership, joint venture, business trust,
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		<p>public benefit corporation, or nonprofit entity); or an institution of higher education.</p> <p>The aid may be paid directly to the student or to the educational institution on the student’s behalf. However, any student financial assistance paid to the student must be verified by the SLHA as consistent with this section.</p> <p>Student financial assistance, excluded here, does not include:</p> <ul style="list-style-type: none"> • Any assistance that is already excluded under Title IV of the HEA • Financial support provided to the student in the form of a fee for services performed (e.g., a work study or teaching fellowship that is not excluded as Title IV HEA Assistance). • Gifts, including gifts from family or friends; or • Any amount of the scholarship or grant that, either by itself or in combination with HEA assistance exceeds the actual covered costs of the student.
<p>Chapter 11 Income Determination</p> <p>11.4 Income Excluded for Annual Income</p> <p>11.4.11 Additional Exclusions from Annual Income</p>	<ul style="list-style-type: none"> • Adoption Assistance payments in excess of \$480 per adopted child 	<ul style="list-style-type: none"> • Adoption assistance payments [24 CFR 5.609(b)(15)]

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<p>Chapter 11 Income Determination</p> <p>11.4 Income Excluded for Annual Income</p> <p>11.4.12 Federally Mandated Income Exclusions [24 CFR 5.609(b)(22)]</p>		<p>***ADD NEW SECTION</p> <p>Federally Mandated Income Exclusions [24 CFR 5.609(b)(22)]</p> <p>Amounts that HUD is required by federal statute to exclude as income for determining eligibility or benefits will be included in this section following publication by HUD in the Federal Register. As HUD issues subsequent notices this section will be updated with additional information.</p>
<p>Chapter 11 Income Determination</p> <p>11.4 Income Excluded for Annual Income</p> <p>11.4.13 Excluded Assets [25 CFR 5.603(b) “Net Family Assets” Para. (3) and (4)]</p>		<p>***ADD NEW SECTION</p> <p>Excluded Assets [25 CFR 5.603(b) “Net Family Assets” Para. (3) and (4)]</p> <p>The Housing Opportunity Through Modernization Act of 2016 specifically excludes certain assets from the definition of net family assets.</p> <ul style="list-style-type: none"> • Necessary items of personal property including but not limited to, Medical devices, vehicle for commuting, etc. • Non-necessary items of personal property if the combined total value does not exceed \$50,000. For example, vintage baseball cards, recreational boat, coin collection, art so long as the total value is under the limit, etc. • Retirement account recognized by IRS IRA, 401(k), 401(b) and retirement plans for self-employed individuals • Real property that the family does not have the effective legal authority to sell in the jurisdiction in which the property is located. For example, property subject to a lawsuit may be legally restricted from sale. • Any amounts recovered in any civil action or settlement based on a claim of malpractice, negligence, or other breach of duty owed to a family member, for an incident resulting in a disability

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		<ul style="list-style-type: none"> • The value of certain education or disability support savings accounts Under Internal Revenue Code sections 529, 529A, 530, “baby bond” accounts Coverdell accounts, tuition programs, any “baby bond” account created, authorized, or funded by Federal, state, or local government Real property Interest in Indian trust land Family has interest in land held in trust by Bureau of Indian Affairs Existing exclusion • Equity in a manufactured home where the family receives assistance under the Housing Choice Voucher Program (24 CFR 982) • Equity in property where the family receives assistance under the Housing Choice Voucher Program (24 CFR 982) HCV Homeownership Program • Family Self-Sufficiency (FSS) accounts • Federal tax refunds or refundable tax credits for a period of 12 months after receipt by the family Earned Income Tax Credits (EITC) <p>Trust Funds are not revocable by, or under the control of, any member of the family or household</p>
<p>Chapter 11 Income Determination</p> <p>11.6 Earned Income Disallowance</p>	<p>Earned Income Disallowance [24 CFR 960.255 and Notice PIH 2016-05]</p>	<p>Earned Income Disallowance [24 CFR 960.255 and Notice PIH 2016-05]</p> <p>***ADD TO SECTION</p> <p>EID is only available to families that are eligible for and already participating in the program as of January 1, 2021. After January 1, 2021, eligible families may continue to receive the benefits of EID until their 12-month period has expired. Effective January 1, 2026 no families will receive the EID benefit.</p>

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<p>Chapter 11 Income Determination</p> <p>11.6 Earned Income Disallowance</p> <p>11.6.6 Jobs Plus Earned Income Disregard (JPEID) – Clinton Peabody only</p>	<p>Jobs Plus Earned Income Disregard (JPEID) – Clinton Peabody only</p> <p>SLHA will disallow all earned income from rent determinations for families participating in the Jobs-Plus Pilot Program at Clinton Peabody. The disregard applies to all earned income increases due to employment over the baseline income for the remaining term of the grant beginning on the date on which employment commenced. To qualify for JPEID, the family members must be enrolled in the Jobs-Plus program. There shall be no phase-in period for families participating in Jobs-Plus and upon completion of the grant, the family shall be required to provide 100% of the amount of the applicable total rent increase. The standard lifetime maximum 24-month disallowance proscribed in 11.6.5 shall not apply to families participating in Jobs-Plus.</p>	<p>***REMOVE SECTION</p>
<p>Chapter 11 Income Determination</p> <p>11.7 Determination of Income Using Other Means Tested Public Assistance (IE, “Safe Harbor” [24 CFR 5.609(c)(3)]</p>	<p>DRAFT</p>	<p>***ADD SECTION</p> <p>Determination of Income Using Other Means Tested Public Assistance (IE, “Safe Harbor” [24 CFR 5.609(c)(3)]</p> <p>SLHA may determine the family’s income prior to the application of any deductions based on income calculation information from other means-tested forms of federal public assistance programs or agencies, listed below, made within the previous 12-month period.</p> <p>SLHA will use third-party verification, which must include the family size and composition and state the family’s annual income. The verification must be dated within the time frame specified for the type of verification, including within the previous 12-month period for purposes of the specified means-tested forms of federal public assistance. The family members listed in the third-party verification must match the family composition in the assisted unit. The annual income need not be broken down by family members nor income type.</p>

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		<p>Given that annual income includes income earned from assets, when using Safe Harbor to verify a family's income, SLHA will not inquire as to a family's net family assets, nor the income earned from those assets except with respect to whether the family owns assets which exceed the asset limitation in 24 CFR § 5.618.</p> <p>If multiple determinations are available that meet all of the minimum verification criteria, SLHA will use the most recent determination (if completed more than 3 months apart). If determinations were completed within 3 months, SLHA will use them in the following order:</p> <ol style="list-style-type: none">1) The Low-Income Housing Tax Credit program (26 U.S.C. 42).2) The Supplemental Nutrition Assistance Program (42 U.S.C. 2011 et seq.).3) The Special Supplemental Nutrition for Women, Infants, and Children (42 U.S.C. 1786).4) The Temporary Assistance for Needy Families block grant (42 U.S.C. 601, et seq.).5) Medicaid (42 U.S.C. 1396 et seq.).6) Supplemental Security Income (42 U.S.C. 1381 et seq.).7) The Earned Income Tax Credit (26 U.S.C. 32). <p>If SLHA cannot obtain the required third-party verification, or if the family disputes the determination, the SLHA will calculate the family's annual income using the methods established in 5.609(c)(1) and (2) or in the applicable program regulations.</p>
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<p>Chapter 12 Verifying Income</p> <p>12.10 Income From Assets</p>	<p>Income from Assets</p>	<p>Income from Assets [24 CFR 5.603(b) and (“Net Family Assets” para. (2); 5.618(b)], 24 CFR 5.603(b)(3) and (4)]</p> <p>SLHA will determine each family’s net family assets at the time of admission and at annual and interim reexaminations. For new admissions, SLHA will determine net family assets and anticipated income earned from assets based solely on a family self-certification, provided that net family assets are equal to or less than \$50,000. After a family’s assets of \$50,000 or less have been self-certified for two years in a row, at the next annual reexamination, SLHA will fully verify net family assets and anticipated income earned from assets. After fully verifying the family’s net family assets, SLHA will resume accepting self-certification until the third annual reexam following the most recent full verification. If net family assets are greater than \$50,000, assets will be fully verified in accordance with the methods detailed in this section. When calculating Net Family Assets, the PHA must include the value of non-necessary items of personal property if the combined value exceeds \$50,000. When determining new family assets, SLHA will take the following steps:</p> <ol style="list-style-type: none"> 1. Provide the family with a description of non-necessary personal property and ask the family to estimate the total value of their non-necessary personal property. If the family estimates that their non-necessary personal property is valued under \$50,000 (as adjusted annually for inflation) then the SLHA will not ask the family to report the individual items of non-necessary personal property, except every third year when the SLHA is fully verifying all assets. 2. If the family’s non-necessary personal property has a net value over \$50,000, SLHA will ask the family to report a full list of their non-necessary personal property. SLHA will assess the list to determine if any of the items are necessary personal property. SLHA will make a determination as to each item identified, based on HUD (or SLHA) guidance, and if the item is determined to be necessary, or otherwise excluded from net family assets, like a retirement
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		<p>account, educational savings account, etc., it will be excluded from the family's net assets.</p> <p>SLHA will consider the following to be necessary items of personal property:</p> <ul style="list-style-type: none">• Any automobile regularly used by a member of the family to commute to work, school, or childcare• Any computer or electronic device (such as laptop, tablet, monitor, or cellphone) that is used by any family member to work, look for work, or study• Any item used for religious purposes (such as a historic book of scripture).• Any furniture used in the family's home• Jewelry or other keepsakes which hold religious or cultural value, or deep family significance. <p>SLHA will consider the following to be non-necessary items of personal property:</p> <ul style="list-style-type: none">• Bank accounts and other financial investments (e.g., checking account, savings account, stocks/bonds)• Any automobile that is used purely for recreation (such as an RV or camping trailer) and not for any of the defined "necessary" uses,• Collectible items (such as sports cards or trading cards) that are not used for a work-related purpose by a family member SLHA may make case-specific determinations of other "necessary" items.
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<p>Chapter 12 Verifying Income</p> <p>12.10 Income From Assets</p> <p>12.10.5 Assets Disposed of for Less than Fair Market Value (FMV) During Two Years Preceding Effective Date of Certification or Recertification</p>	<p>SLHA will obtain the family's certification as to whether any member has disposed of assets for less than fair market value during the two years preceding the effective date of the certification or re-certification. If the family certifies that they have disposed of assets for less than fair market value, verification or certification is required that shows: all assets disposed of for less than FMV, the date they were disposed of, the amount the family received, and the market value of the assets at the time of disposition. Third party verification will be obtained wherever possible.</p>	<p>SLHA will obtain the family's certification as to whether any member has disposed of assets for less than fair market value during the two years preceding the effective date of the certification or re-certification. SLHA must include the value of any business or family assets sold for less than fair market value (including a disposition in trust, but not in a foreclosure or bankruptcy sale) during the two years preceding the date of application or reexamination, in excess of the amount received. In the case of a sale as part of a separation or divorce settlement, the sale or other disposition will not be considered to have been for less than fair market value if the applicant or tenant receives other compensation not measurable in dollar terms. Negative equity in real property or other investments does not prohibit the owner from selling the property or other investments, so negative equity alone would not justify an exclusion from family assets. If the family certifies that they have disposed of assets for less than fair market value, verification or certification is required that shows: all assets disposed of for less than FMV, the date they were disposed of, the amount the family received, and the market value of the assets at the time of disposition. Third party verification will be obtained wherever possible.</p>
<p>Chapter 12 Verifying Income</p> <p>12.11 Zero Income Status</p>	<p>Zero Income Status</p> <p>SLHA will check UIV sources and/or request information from third party sources to verify that certain forms of income such as unemployment benefits, TANF, SSI, etc., are not being received by families claiming to have zero annual income. Income of families claiming to have zero income will be reviewed at least every six months.</p>	<p>Zero Income Status [24 CFR § 5.609(b)(24)(vi); 24 CFR §§ 5.657(c)(3); 960.257(b)(3); 982.516(c)(3); and 882.515(b)(3)]</p> <p>SLHA will check UIV sources and/or request information from third party sources to verify that certain forms of income such as unemployment benefits, TANF, SSI, etc., are not being received by families claiming to have zero annual income. SLHA will no longer conduct zero income review for zero income families. Instead, SLHA will monitor zero income families in EIV to identify increases in income.</p>

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<p>Chapter 13 Adjustments to Annual Income</p> <p>13.1 Overview</p>	<p>This chapter defines the allowable expenses and deductions to be subtracted from annual income to determine the family’s adjusted annual income. SLHA will use the methods as set forth in this chapter to determine accurate adjustments to income to ensure that families are not paying more or less for rent than their obligation. SLHA must verify all adjustments to annual income. Verification requirements are provided in Chapters 7 and 14</p>	<p>This chapter defines the allowable expenses and deductions to be subtracted from annual income to determine the family’s adjusted annual income. SLHA will use the methods as set forth in this chapter to determine accurate adjustments to income to ensure that families are not paying more or less for rent than their obligation. SLHA must verify all adjustments to annual income. Verification requirements are provided in Chapters 7 and 14. SLHA will not be considered out of compliance for a “de minimis” error that results in a difference in the determination of a family’s adjusted income \$30 or less per month (or \$360 in annual adjusted income).</p>
<p>Chapter 13 Adjustments to Annual Income</p> <p>13.2 Dependent Deduction</p>	<p>Dependent Deduction</p> <p>SLHA will deduct \$480 from the annual income for each dependent. A dependent is any family member other than the head, spouse, life partner or co-head who is under the age of 18 or who is 18 or older and is a person with disabilities or a full time student. Foster children, foster adults and live-in aides are never dependents.</p>	<p>Dependent Deduction [24 CFR 5.611 (a)(1)-(a)(2)]</p> <p>SLHA will deduct \$480 from the annual income for each dependent. A dependent is any family member other than the head, spouse, life partner or co-head who is under the age of 18 or who is 18 or older and is a person with disabilities or a full time student. Foster children, foster adults and live-in aides are never dependents. The above deduction is for 2024 and subject to change as HUD generally revises the amount on annual basis. The latest amount, as established and approved by HUD, shall be applicable and is automatically incorporated into this policy as of the effective date of the newly established amount.</p>
<p>Chapter 13 Adjustments to Annual Income</p> <p>13.3 Elderly or Disabled Family Deduction</p>	<p>Elderly or Disabled Family Deduction</p> <p>SLHA will deduct \$400 from the annual income for any elderly or disabled family. An elderly family is a family whose head, spouse, life partner, co-head or sole member is 62 years of age or older. A disabled family is a family whose head, spouse, life partner, co-head or sole member is a person with disabilities. Only a single \$400 will be taken per family.</p>	<p>Elderly or Disabled Family Deduction [24 CFR 5.611 (a)(1)-(a)(2)]</p> <p>SLHA will deduct \$525 from the annual income for any elderly or disabled family. An elderly family is a family whose head, spouse, life partner, co-head or sole member is 62 years of age or older. A disabled family is a family whose head, spouse, life partner, co-head or sole member is a person with disabilities. Only a single \$525 will be taken per family. The above deduction is for 2024 and subject to change as HUD generally revises the amount on annual basis. The latest amount, as established and approved by HUD, shall be applicable and is automatically incorporated into this policy as of the effective date of the newly established amount.</p>

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<p>Chapter 13 Adjustments to Annual Income</p> <p>13.4 Medical Expense Deduction</p>	<p>Medical Expenses Deduction</p> <p>SLHA will deduct unreimbursed medical expenses from the annual income to the extent that, in combination with any disability assistance expenses, they exceed three percent of annual income. The medical expense deduction is only for families in which the head, spouse, life partner or co-head is at least 62 or is a person with disabilities. If a family is eligible for a medical expense deduction, the medical expenses of all family members are included in the determination of the amount of the deduction.</p>	<p>Medical Expenses Deduction [24 CFR 5.611(a)(3)]</p> <p>SLHA will deduct unreimbursed health and medical care expenses plus unreimbursed reasonable attendant care and auxiliary apparatus expenses to the extent that, the sum of expenses exceeds ten percent (10%) of annual income. The medical expense deduction is only for families in which the head, spouse, life partner or co-head is at least 62 or is a person with disabilities. If a family is eligible for a medical expense deduction, the medical expenses of all family members are included in the determination of the amount of the deduction.</p>
<p>Chapter 13 Adjustments to Annual Income</p> <p>13.4 Medical Expense Deduction</p> <p>13.4.2 Hardship Exemptions for Medical Expenses Deductions</p>	<p style="text-align: center; font-size: 48px; opacity: 0.3; transform: rotate(-30deg);">DRAFT</p>	<p>***ADD NEW SECTION</p> <p>13.4.2 Hardship Exemptions for Medical Expenses Deductions [24 CFR 5.611(c)(1) and 5.611(c)(2)]</p> <p>There are two types of hardship exemptions to the ten (10%) percent threshold for deducting eligible medical expenses under Section 13.4. General Relief is for families that can demonstrate that the family's eligible medical increased, or the family's financial hardship is a result of a change in circumstances that would not otherwise trigger an interim reexamination. Phased-In Relief, is for families eligible for and taking the Medical Expense Deductions in effect prior to January 1, 2024.</p> <p>13.4.2.1 General Relief</p> <p>A family may request a hardship exemption for health or medical care expenses, reasonable attendant care, or auxiliary apparatus expenses. A family must demonstrate that their applicable expenses increased or they experienced a change in circumstances that resulted in a financial hardship, as defined below, that would not otherwise trigger an interim reexamination. A change in circumstances includes the need for new, qualifying, health/medical, reasonable attendant care and auxiliary</p>

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		<p>apparatus expenses or an increase in the cost of qualifying expenses so that qualifying expenses exceed 5% of the family's annual income.</p> <p>This relief is available regardless of whether the family previously received health and medical deductions or is currently receiving, or previously received, a phased-in hardship exemption under Section 13.4.2.2</p> <p>The exemption ends when the circumstances that made the family eligible for the exemption no longer apply or after 90 days, whichever comes earlier. If the family wishes to request a successive 90-day period for the exemption, they must make that request within 10 days of the end of the current eligibility period.</p> <p>SLHA must comply with the Health Insurance Portability and Accountability Act (HIPAA) (Pub. L. 104-191, 110 Stat. 1936) and the Privacy Act of 1974 (Pub. L. 93-579, 88 Stat. 1896) when requesting documentation to determine eligibility for a hardship exemption. SLHA may not request documentation beyond what is sufficient to determine anticipated health and medical care and/or reasonable attendant care and auxiliary apparatus costs or when a change in circumstances took place.</p> <p>SLHA will verify that:</p> <ul style="list-style-type: none">• The family member for whom the expense is incurred is a person with disabilities.• The expense permits a family member, or members, to work.• The expense is not reimbursed from another source. <p>SLHA will accept written third-party documents provided by the family such as receipts, cancelled checks, billing statements or other evidence of payments. If family-provided documents are not available, SLHA will provide a third-party verification form directly to the care provider(s) requesting the needed information. If third-party verification is not</p>
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		<p>possible, written family certification as to costs anticipated to be incurred and the anticipated period.</p> <p>13.4.2.2 Phased-In Relief</p> <p>Families who received the medical expense deduction based on their most recent income examination prior to January 1, 2024, will begin receiving the 24-month phased-in relief at their next annual or interim reexamination, effective October 1, 2021. Families who receive this phased-in relief will have eligible expenses deducted as follows:</p> <ul style="list-style-type: none"> • 1st twelve months– in excess of 5% of annual income. • 2nd twelve months – in excess of 7.5% of annual income. • After 24 months – in excess of 10% threshold will phase in and remain in effect unless the family qualifies for general hardship relief. <p>Once a family chooses to obtain General Relief, a family may no longer receive the phased-in relief.</p>
<p>Chapter 13 Adjustments to Annual Income</p> <p>13.5 Disability Assistance Expenses Deduction</p> <p>13.5.1 Earned Income Limit on the Disability Assistance Expense Deduction</p>	<p>The disability expense deduction is capped by the amount of earned income received by family members who are 18 years of age or older and who are able to work because of the expense. The earned income used for this purpose is the amount verified before any earned income disallowances or income exclusions are applied.</p>	<p>The disability expense deduction is capped by the amount of earned income received by family members who are 18 years of age or older and who are able to work because of the expense. The earned income used for this purpose is the amount verified before any income exclusions are applied.</p>

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<p>Chapter 13 Adjustments to Annual Income</p> <p>13.7.1.5 Hardship Exemption</p>		<p>***ADD NEW SECTION</p> <p>13.7.1.5 Hardship Exemption [24 CFR 5.611(a)(4)]</p> <p>Families who are ineligible to continue to receive the child care expense deduction may be eligible for a hardship exemption if they are unable to pay rent due to the loss of a child care expense deduction. To qualify families must:</p> <ul style="list-style-type: none">• Already be receiving the childcare deduction.• Demonstrate that the loss of the deduction and that the lack of childcare would cause hardship. <p>The exemption ends when the circumstances that made the family eligible for the exemption no longer apply or after 90 days, whichever comes earlier. If the family wishes to request a successive 90-day period for the exemption, they must make that request within 10 days of the end of the current eligibility period.</p> <p>Families must report changes to SLHA if the circumstances that made the family eligible for the child care deduction are longer applicable. If the family reports the change in circumstances within 30 days, any increase will be effective on the first of the month following 30 days' notice to the family. If a family fails to report a change within the required timeframe, then adjustment will be made retroactive to the date it would have been effective had the information been provided on a timely basis. The family will be responsible for any underpaid rent and may be offered a repayment agreement.</p>
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<p>Chapter 13 Adjustments to Annual Income</p> <p>13.8 Policy for Determination of the Family's Inability to Pay Rent</p>	<p style="text-align: center; font-size: 48px; opacity: 0.3; transform: rotate(-30deg);">DRAFT</p>	<p>***ADD NEW SECTION</p> <p>13.8 Policy for Determination of the Family's Inability to Pay Rent [24 CFR 5.611(e)]</p> <p>It is the policy of SLHA to offer general hardship relief for the regular health and medical expenses deduction and the child care deduction. Hardship includes the following situations:</p> <p>Child care:</p> <ul style="list-style-type: none"> • A death has occurred in the family. In order to qualify under this provision, a family must describe how the death has created a need for child care. • A health/ medical issue in the family which has created the need for child care. In order to qualify under this provision, a family must describe how the health or medical issues have created a need for child care. <p>A family is considered to have a hardship when:</p> <ul style="list-style-type: none"> • The household's family share of total housing costs exceeds 35 percent of adjusted household income. • Or when the family would be evicted because it is unable to pay the tenant portion of the rent. <p>Family health and medical expenses:</p> <ul style="list-style-type: none"> • A change in circumstances includes the need for new, qualifying, health / medical, reasonable attendant care and auxiliary apparatus expenses or an increase in the cost of qualifying expenses so that qualifying expenses exceed 5% of the family's annual income. • For hardship conditions based on loss of income, the hardship condition will continue to be recognized until new sources of income are received that are at least equal to the amount lost.
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		<ul style="list-style-type: none"> • For hardship conditions based upon hardship-related expenses, the minimum rent exemption will continue to be recognized until the cumulative amount exempted is equal to the expense incurred. • The family may receive a deduction of all eligible expenses exceeding 5% of their annual income. • The exemption ends when the circumstances that made the family eligible for the exemption no longer apply or after 90 days, whichever comes earlier.
<p>Chapter 13 Adjustments to Annual Income</p> <p>13.9 Additional (Permissive) Deductions</p>		<p>***ADD NEW SECTION</p> <p>13.9 Additional (Permissive) Deductions [24 CFR 5.611(b)]</p> <p>In addition to deductions that SLHA is required by HUD to consider, SLHA may establish other “permissive” deductions. SLHA has opted not to use permissive deductions.</p>
<p>Chapter 18 Rent Determination</p> <p>18.2 Flat Rents and Family Choice of Rent</p> <p>18.2.5 Flat Rents and Earned Income Disallowance</p>	<p>Flat Rents and Earned Income Disallowance</p> <p>Because the EID is a function of income-based rents, a family currently paying flat rent cannot qualify for the EID even if a family member experiences an event that would qualify the family for the EID. If the family later chooses to pay income-based rent, they would only qualify for the EID if a new qualifying event occurred. A family currently paying flat rent that previously qualified for the EID while paying incomebased rent and is currently within their 24 month period would have the 12 cumulative months of full (100 percent) and half (50 percent) exclusion continue while paying flat rent as long as the employment that is the subject of the exclusion continues, and the 24-month lifetime limit would continue uninterrupted.</p>	<p>***REMOVE SECTION</p>

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	A family paying flat rent could therefore see a family member's 24-month lifetime limit expire while the family is paying flat rent.	
<p>Chapter 18 Rent Determination</p> <p>18.4 Prorated Rent for Mixed Families</p>	When the mixed family's TTP is greater than the maximum rent, SLHA will use the TTP as the mixed family TTP. Once a mixed family has exceeded the over-income limit for twenty-four (24) consecutive months, the family will have their tenancy terminated. In that event, the mixed family will pay their current, prorated rent amount during the 6-month period before termination.	When the mixed family's TTP is greater than the maximum rent, SLHA will use the TTP as the mixed family TTP. Once a mixed family has exceeded the over-income limit for twenty-four (24) consecutive months, the family will have their tenancy terminated in accordance with SHLA's policy for Over Income Families. In that event, the mixed family will pay their current, prorated rent amount during the 6-month period before termination.
<p>Chapter 20 Reexaminations</p> <p>20.4 Interim Reexaminations</p>	Interim Reexaminations	Interim Reexaminations [24 CFR §§ 960.257(b)(6); 982.516(c)(4); and 882.515(b)(4) - (b)(5)]

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<p>Chapter 20 Reexaminations</p> <p>20.5 Changes Affecting Income or Expenses</p>	<p>Changes Affecting Income or Expenses</p>	<p>Changes Affecting Income or Expenses [24 CFR 960.257(b), 982.516(c), 882.515(b)]</p>
<p>Chapter 20 Reexaminations</p> <p>20.5 Changes Affecting Income or Expenses</p> <p>20.5.1 SLHA-Initiated Interim Reexaminations</p>	<p>SLHA-initiated interim reexaminations are those that are scheduled based on circumstances or criteria defined by SLHA. SLHA will conduct interim reexaminations in each of the following instances:</p> <ul style="list-style-type: none"> • For families receiving the Earned Income Disallowance (EID), SLHA will conduct an interim reexamination at the start and conclusion of the second 12-month exclusion period (50% ease-in period) Revised June 22, 2023 20-6 Resolution No. 2968 • If the family has reported zero income, SLHA will conduct an interim reexamination every 6 months as long as the family continues to report that they have no income • If at the time of the annual reexamination, it is not feasible to anticipate a level of income for the next 12 months (e.g. seasonal or cyclic income), SLHA will schedule an interim reexamination to coincide with the end of the period for which it is feasible to project income • If at the time of the annual reexamination, resident-provided documents were used on a provisional basis due to the lack of third party verification, and third party verification becomes available, SLHA will conduct an interim reexamination • SLHA may conduct an interim reexamination at any time in order to correct an error in a previous 	<p>SLHA-initiated interim reexaminations are those that are scheduled based on circumstances or criteria defined by SLHA. SLHA will conduct interim reexaminations in each of the following instances:</p> <ul style="list-style-type: none"> • If the family has reported zero income, SLHA will conduct an interim reexamination every 6 months as long as the family continues to report that they have no income • If at the time of the annual reexamination, it is not feasible to anticipate a level of income for the next 12 months (e.g. seasonal or cyclic income), SLHA will schedule an interim reexamination to coincide with the end of the period for which it is feasible to project income • If at the time of the annual reexamination, resident-provided documents were used on a provisional basis due to the lack of third party verification, and third party verification becomes available, SLHA will conduct an interim reexamination • SLHA may conduct an interim reexamination at any time in order to correct an error in a previous reexamination, or to investigate a resident fraud complaint

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	<p>reexamination, or to investigate a resident fraud complaint</p>	
<p>Chapter 20 Reexaminations</p> <p>20.5 Changes Affecting Income or Expenses</p> <p>20.5.2 Family-Initiated Interim Reexaminations</p> <p>20.5.2.1 Required Reporting</p>	<p>Families are required to report all increases in income including new employment, within 30 days of the date the change takes effect.</p>	<p>Families are required to report all increases in income including new employment, within 30 days of the date the change takes effect. Depending on the anticipated change, SLHA will take the following action:</p> <ul style="list-style-type: none"> • If SLHA anticipates a family’s adjusted income will decrease by greater than 10%, SLHA must conduct an interim reexamination • If SLHA anticipates a family’s adjusted income will decrease by less than 10%, then SLHA may decline the request for reexamination since no reexamination is required. • If SLHA anticipates a family’s adjusted income will increase by greater than 10% SLHA must conduct an interim reexamination. SLHA may decline to conduct an interim reexamination if the increase occurred within three months to a regular annual reexamination.
<p>Chapter 20 Reexaminations</p> <p>20.5 Changes Affecting Income or Expenses</p> <p>20.5.3.3 Effective Dates</p>	<p>SLHA has established the time frames in which any changes that result from an interim reexamination will take effect. The changes may be applied either retroactively or prospectively, depending on whether there is to be an increase or a decrease in the rent, and whether the family reported any required information within the required time frames.</p> <ul style="list-style-type: none"> • If the rent is to increase: <ul style="list-style-type: none"> ○ Change must be expected to last at least thirty days. Revised June 22, 2023 20-7 Resolution No. 2968 	<p>SLHA has established the time frames in which any changes that result from an interim reexamination will take effect. The changes may be applied either retroactively or prospectively, depending on whether there is to be an increase or a decrease in the rent, and whether the family reported any required information within the required time frames.</p> <ul style="list-style-type: none"> • If the rent is to increase: <ul style="list-style-type: none"> ○ Change must be expected to last at least thirty days. ○ The increase generally will be effective on the first of the month following 30 days’ notice to the family.

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		<p>decrease in income or the effective date of the most recent admission, interim, or annual income examination. A rent adjustment cannot be retroactive to a date prior to the last income examination</p> <p>In case of any rent adjustment, the family will be provided with clear, written communication after the interim reexamination that shows:</p> <ul style="list-style-type: none"> • Any one-time charge or credit due to a retroactive adjustment. • The new monthly rent due. • The date that rent is due. • The date of the family’s next annual income reexamination.
<p>Chapter 20 Reexaminations</p> <p>20.5 Changes Affecting Income or Expenses</p> <p>20.5.3.4 Discrepancies</p>	<p>Discrepancies</p> <p>During an annual or interim reexamination, SLHA may discover that information previously reported by the family was in error, or that the family intentionally misrepresented information. In addition, SLHA may discover errors made by SLHA. When errors resulting in the overpayment or underpayment of rent are discovered, corrections will be made in accordance with the policies in Chapter 3.</p>	<p>Discrepancies 24 CFR 5.233, 24 CFR §§ 5.609(c)(4); 960.257(f); 982.516(f); 882.515(f); and 882.808(i)(5)</p> <p>During an annual or interim reexamination, SLHA may discover that information previously reported by the family was in error, or that the family intentionally misrepresented information.</p> <p>If it is later determined that a family inaccurately reported income during an interim reexamination, the family may owe the SLHA for any miscalculation in rent based on the family’s incorrect reporting. SLHA will review the EIV New Hires report between annual reexaminations given the SLHA’s policy to not include earned income increases in determining whether the 10% threshold is met for increases in adjusted income when the family previously had an interim reexamination performed for a decrease in annual adjusted income since the last annual reexamination</p> <p>In addition, SLHA may discover errors made by SLHA. SLHA will not be considered out of compliance for a “de minimis” error that results in a</p>

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		<p>difference in the determination of a family's adjusted income \$30 or less per month (or \$360 in annual adjusted income)</p> <p>On becoming aware of an error(s), SLHA must correct retroactively to the effective date of the action the error was made regardless of the dollar amount. SLHA must repay or credit the family regardless of the dollar amount. SLHA must repay or credit the family for overcharged rent, but is not required to charge back rent if the family was undercharged. When errors resulting in the overpayment or underpayment of rent are discovered, corrections will be made in accordance with the policies in Chapter 3.</p>
<p>Chapter 20 Reexaminations</p> <p>20.6 Over Income Families</p>	<p>Over Income Families</p> <p>The Housing Opportunity Through Modernization Act (HOTMA) of 2016 placed an income limitation on public housing tenancies. The over-income requirement states that after a family's adjusted income has exceeded 120 percent of area median income (AMI) (or a different limitation established by the secretary) for two consecutive years, the PHA must either terminate the family's tenancy within six months of the determination, or charge the family a monthly rent that is the higher of the applicable fair market rent (FMR) or the amount of monthly subsidy for the unit, including amounts from the operating and capital funds, as determined by regulations. The over-income limit is calculated by multiplying the very low income limit (VLI) by 2.4, as adjusted for family size. These income limits are established each year by HUD, and published in the Federal Register.</p> <p>At the annual or interim reexamination, if it is determined that a family's adjusted income exceeds the applicable over-income limit, the SLHA will document the family file and begin tracking the family's over-income status.</p>	<p>Over Income Families [24 CFR 960.507, 24 CFR 960.509]</p> <p>The Housing Opportunity Through Modernization Act (HOTMA) of 2016 placed an income limitation on public housing tenancies. The over-income requirement states that after a family's adjusted income has exceeded 120 percent of area median income (AMI) (or a different limitation established by the secretary) for twenty-four (24) consecutive months, the PHA must terminate the family's tenancy within six (6) months of the final notification. The over-income limit is equal to approximately 120% of the AMI and is calculated by multiplying the very low-income limit (VLI) by 2.4, as adjusted for family size. Income limits are established annually by HUD, and published in the Federal Register. Please refer to Appendix 2 of this ACOP for current income limits.</p> <p>At the annual or interim reexamination, if it is determined that a family's adjusted income exceeds the applicable over-income limit, the SLHA will document the family file and begin tracking the family's over-income status. SLHA will notify families in writing within thirty (30) days of the reexamination of their over-income status and that they may be subject to SLHA's Over-Income Policy.</p> <p>If the family's income continues to exceed the applicable over-income limit twelve (12) months after the applicable annual or interim reexamination, SLHA will notify the family in writing that their income</p>

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	<p>If the family’s income continues to exceed the applicable over-income limit one year after the applicable annual or interim reexamination, SLHA will notify the family in writing that their income has exceeded the over-income limit for one year, and that the family may be subject to SLHA’s over-income policy.</p> <p>If the family’s income continues to exceed the applicable over-income limit for a second consecutive year after the initial over-income determination, SLHA will provide the family a notice of lease termination in accordance with the notification requirements in this ACOP.</p> <p>If, at any time, an over-income family experiences a decrease in income during the two-year grace period, the family may request an interim redetermination of income in accordance with PHA policy. If it is determined that the over-income family is now below the over-income limit, the family is no longer subject to over-income provisions as of the effective date of the recertification.</p> <p>The PHA will notify the family in writing that over-income policies no longer apply to them. If the family’s income later exceeds the over-income limit again, the family is entitled to a new twoyear grace period.</p>	<p>has exceeded the over-income limit for twelve (12) months , and that the family may be subject to SLHA’s Over-Income Policy.</p> <p>If the family’s income continues to exceed the applicable over-income limit at the conclusion of the twenty (24) month grace period after the applicable annual or interim reexamination SLHA will provide the family a notice of lease termination in accordance with the notification requirements in this ACOP. SLHA must terminate the tenancy of the over-income family no more than six (6) months after the required notification.</p> <p>If, at any time, an over-income family experiences a decrease in income during the twenty-four (24) month grace period, the family may request an interim reexamination in accordance with this ACOP. If SLHA determines that the over-income family has fallen below the over-income limit at any time during the twenty-four (24) month grace period then the family is no longer subject to the over-income provisions as of the effective date of the reexamination. If the family should exceed the over-income limit again, SLHA will begin a new twenty-four (24) month grace period. SLHA will notify the family in writing that over-income policies no longer apply to them.</p>
<p>Chapter 22</p> <p>22.1 Lease Terminations</p> <p>22.1.2.1 Mandatory Terminations</p>	<ul style="list-style-type: none"> • For a “One Strike” violation: Violent criminal activity or drug-related criminal activity on or off the premises, or any criminal activity that threatens the health, safety and welfare of SLHA residents or employees (including management staff) 	<ul style="list-style-type: none"> • For a “One Strike” violation: Any criminal activity that threatens the health, safety, or right to peaceful enjoyment of the premises of other residents or employees of the PHA. Any violent or drug-related criminal activity on or off such premises. Any criminal activity that resulted in felony conviction of a household member.

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<p>Chapter 22</p> <p>22.1 Lease Terminations</p> <p>22.1.2.2 Serious Violations or Other Good Cause -- Examples</p>	<ul style="list-style-type: none"> Meeting or exceeding the over-income limit 	<ul style="list-style-type: none"> Meeting or exceeding the over-income limit in accordance with SHLA's policy for Over Income Families. See Section 20.6
<p>Chapter 22</p> <p>22.1 Lease Terminations</p> <p>22.1.2.3 Notice Timing and Requirements</p>	<ul style="list-style-type: none"> 60 days for over-income households 	<ul style="list-style-type: none"> 60 days for over-income households. Refer to SLHA's policy for Over Income Families in Section 20.6
<p>Chapter 23 Grievance and Appeals</p> <p>23.3 Grievance Procedure for Public Housing Residents</p> <p>23.3.1 Applicability</p>	<p>SLHA excludes from the grievance procedure any grievance concerning a termination of tenancy or eviction that involves:</p> <ul style="list-style-type: none"> Any criminal activity that threatens the health, safety or right to peaceful enjoyment of the premises of other residents or employees of SLHA or its management agents Any violent or drug-related criminal activity on or off the development premises Any criminal activity that resulted in felony conviction of a household member 	<p>Pursuant to the One Strike You're Out Policy, SLHA excludes from the grievance procedure any grievance concerning a termination of tenancy or eviction that involves:</p> <ul style="list-style-type: none"> Any criminal activity that threatens the health, safety or right to peaceful enjoyment of the premises of other residents or employees of SLHA or its management agents Any violent or drug-related criminal activity on or off the development premises Any criminal activity that resulted in felony conviction of a household member

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<p>Chapter 23 Grievance and Appeals</p> <p>23.3 Grievance Procedure for Public Housing Residents</p> <p>23.3.2 Informal Settlement of Grievance</p>	<p>SLHA will accept requests for an informal settlement of a grievance either orally or in writing, to SLHA office within five business days of the grievable event. Within 10 business days of receipt of the request SLHA, through its management agent, will arrange a meeting with the resident at a mutually agreeable time and confirm such meeting in writing to the resident.</p> <p>If a resident fails to attend the scheduled meeting without prior notice, SLHA will reschedule the appointment only if the resident can show good cause for failing to appear, or if it is needed as a reasonable accommodation for a person with disabilities. Good cause is defined as an unavoidable conflict, which seriously affects the health, safety or welfare of the family.</p> <p>SLHA will prepare a summary of the informal settlement within five business days; one copy to be given to the resident and one copy to be retained in SLHA's file. The summary must specify the names of the participants, dates of meeting, the nature of the proposed disposition of the complaint and the specific reasons therefore, and will specify the procedures by which a hearing may be obtained if the complainant is not satisfied.</p>	<p>Any grievance shall be presented, either orally or in writing, to SLHA's office or to the office of the property in which the Resident resides within five (5) business days of the grievable event so that the grievance may be discussed informally and settled without a hearing. Within ten (10) business days of receipt of the request SLHA will arrange a meeting with the resident at a mutually agreeable time and confirm such meeting in writing to the resident.</p> <p>A summary of the informal meeting will be provided to the resident within five (5) business days of the informal meeting. One copy shall be given to the resident and one retained in the resident's file. The summary shall specify the names of the participants, dates of meeting, the nature of the proposed disposition of the complaint and the specific reasons therefor, and shall specify the procedures by which a grievance hearing may be obtained if the resident is not satisfied with the outcome of the informal meeting.</p> <p>If a resident fails to attend the scheduled informal meeting without prior notice, SLHA will reschedule the appointment only if the resident can show good cause for failing to appear, or if it is needed as a reasonable accommodation for a person with disabilities. Good cause is defined as an unavoidable conflict, which seriously affects the health, safety or welfare of the family.</p>
<p>Chapter 23 Grievance and Appeals</p> <p>23.3 Grievance Procedure for Public Housing Residents</p> <p>23.3.3 Procedures to Obtain a Formal Hearing</p>		<p>DELETE [24 CFR 966.55]</p>

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<p>Chapter 23 Grievance and Appeals</p> <p>23.3 Grievance Procedure for Public Housing Residents</p> <p>23.3.3 Procedures to Obtain a Formal Hearing</p> <p>23.3.3.1 Requests for Hearing and Failure to Request</p>	<p>Requests for Hearing and Failure to Request [24 CFR 966.55(a), (c), and (d)]</p> <p>All grievances must be presented in accordance with the informal procedures prescribed above as a condition prior to a grievance hearing. However, if the complainant can show good cause for failure to proceed with the informal hearing to the panel, the panel may waive this provision.</p>	<p>Requests for Hearing and Failure to Request</p> <p>Before requesting a formal grievance hearing, the resident must first follow the procedure for the informal settlement meeting prescribed above. However, the formal hearing panel may waive this requirement if the resident can show good cause.</p>
<p>Chapter 23 Grievance and Appeals</p> <p>23.3 Grievance Procedure for Public Housing Residents</p> <p>23.3.3 Procedures to Obtain a Formal Hearing</p> <p>23.3.3.2 Escrow Deposits</p>	<p>Escrow Deposits [24 CFR 966.55(e)]</p> <p>Before a hearing is scheduled in any grievance involving the amount of rent that SLHA claims is due, the complainant must pay an escrow deposit to SLHA. When a complainant is required to make an escrow deposit, the amount is the amount of monthly rent SLHA states is due and payable. After the first deposit, the complainant must deposit the same amount monthly until the complainant’s grievance is resolved by decision of the panel.</p> <p>SLHA will waive the requirement for an escrow deposit where the complainant is grieving the effect of welfare benefits reduction in the calculation of family income or denial of a request for a financial hardship exemption from minimum rent requirements.</p> <p>Unless SLHA waives the requirement, the complainant’s failure to make the escrow deposit will terminate the grievance procedure. A complainant’s failure to pay the escrow deposit does not waive the resident’s right to contest</p>	<p>DELETE</p>

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	<p>SLHA's disposition of the grievance in any appropriate judicial proceeding.</p>	
<p>Chapter 23 Grievance and Appeals</p> <p>23.3 Grievance Procedure for Public Housing Residents</p> <p>23.3.3 Procedures to Obtain a Formal Hearing</p> <p>23.3.4 Scheduling of Hearings</p>	<p>Scheduling of Hearings [24 CFR 966.55(f)]</p> <p>If the complainant has complied with all requirements for requesting a hearing as described above, a hearing will be scheduled promptly. A written notification specifying the time, place and the procedures governing the hearing will be mailed to the complainant.</p>	<p>Scheduling of Hearings [24 CFR 966.56(a)]</p> <p>Upon receipt of the resident's hearing request, SLHA will schedule the grievance hearing promptly for a time and place reasonably convenient to both the resident and SLHA. A written notification specifying the time, place, and the procedures governing the hearing will be sent to the resident via U.S. Mail First Class postage pre-paid.</p>
<p>Chapter 24 Community Service</p> <p>24.2 Requirements</p>	<p>An individual may not skip a month and then double up the following month, unless warranted by special circumstances. SLHA will make the determination of whether to permit a deviation from the schedule. Individuals who have special circumstances which they believe will prevent them from completing the required community service hours for a given month must notify SLHA in writing within five business days of the circumstances becoming known. SLHA will review the request and notify the individual, in writing, of its determination within 10 business days. SLHA may require those individuals to provide documentation to support their claim.</p>	<p>The requirement is not restricted to a precise eight hours per month; a resident could comply by performing any amount of hours per month, as long as at least 96 hours are accumulated by their annual certification.</p>

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<p>Chapter 24 Community Service</p> <p>24.3. Definitions for Community Service</p> <p>24.3.1 Exempt Individual</p>	<p>An exempt individual is an adult who:</p> <ul style="list-style-type: none"> • Is age 62 years or older • Is blind or disabled (as defined under section 216[i][I] or 1614 of the Social Security Act), and who certifies that because of this disability s/he is unable to comply with the service provisions • Is a primary caretaker of such an individual • Is engaged in work activities (SLHA will consider 20 hours per week as the minimum number of hours needed to qualify for a work activity exemption) • Is able to meet requirements under a state program funded under part A of title IV of the Social Security Act (“Block grants To States for Temporary Assistance for Needy Families”), or under any other welfare-to-work program of the state of Missouri. Including a state-administered welfare-to-work program • Is a member of a family receiving assistance, benefits, or services under a state program funded under part A of title IV of the Social Security Act, or under any other welfare program of the state of Missouri, including a state-administered welfare-to-work program or Supplemental Nutrition Assistance Program (SNAP), and has not been found by the state or other administering entity to be in noncompliance with such program. Supplemental Nutrition Assistance Program (SNAP) qualifies as a welfare program of the state. 	<p>An exempt individual is an adult who:</p> <ul style="list-style-type: none"> • Is age 62 years or older • Is blind or disabled (as defined under section 216[i][I] or 1614 of the Social Security Act), and who certifies that because of this disability s/he is unable to comply with the service provisions • Is a primary caretaker of an individual who is blind or disabled (as defined under section 216[i][I] or 1614 of the Social Security Act), and who certifies that because of this disability s/he is unable to comply with the service provisions • Is engaged in work activities as defined by Section 407(d) of the Social Security Act (42 USC Section 607 (d) for at least twenty (20) hours per week • Is able to meet requirements under a state program funded under part A of title IV of the Social Security Act (“Block grants To States for Temporary Assistance for Needy Families”), or under any other welfare-to-work program of the State of Missouri
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<p>Chapter 24 Community Service</p> <p>24.3 Definitions for Community Service</p> <p>24.3.2 Exempt Family</p>		<p>***ADD NEW SECTION</p> <p>An exempt family is a family in which a member is receiving assistance, benefits, or services under a state program funded under part A of title IV of the Social Security Act, or under any other welfare program of the state of Missouri, including a state-administered welfare-to-work program or Supplemental Nutrition Assistance Program (SNAP), and has not been found by the state or other administering entity to be in noncompliance with such program. Supplemental Nutrition Assistance Program (SNAP) qualifies as a welfare program of the State of Missouri.</p>
<p>Chapter 24 Community Service</p> <p>24.5 Determination of Exemption Status and Compliance</p>	<p>SLHA must review and verify family compliance with service requirements annually at least 30 days before the end of the 12-month lease term. The policy for documentation and verification of compliance with service requirements is set forth below</p>	<p>SLHA must review and verify family compliance with service requirements annually. The policy for documentation and verification of compliance with service requirements is set forth below</p>
<p>Chapter 24 Community Service</p> <p>24.5 Determination of Exemption Status and Compliance</p> <p>24.5.1 Annual Determination</p> <p>24.5.1.2 Determination of Compliance</p>	<p>Approximately 60 days prior to the end of the lease term, SLHA will provide written notice requiring the family to submit documentation that all subject family members have complied with the service requirement. The family will have 10 business days to submit SLHA required documentation form(s).</p>	<p>At least 60 days prior to the end of the lease term, SLHA will provide written notice requiring the family to submit documentation that all subject family members have complied with the service requirement. The family will have 10 business days to submit SLHA required documentation form(s).</p>

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<p>Chapter 24 Community Service</p> <p>24.5 Determination of Exemption Status and Compliance</p> <p>24.5.2 Change in Status between Annual Determinations</p> <p>24.5.2.1 Exempt to Nonexempt Status</p>	<p>If an exempt individual becomes nonexempt during the 12-month lease term; it is the family’s responsibility to report this change to SLHA within 30 days from the date the change takes effect. Within 30 days of a family reporting such a change, or SLHA determining such a change is necessary, SLHA will provide a copy of the community service policy, as well as a documentation form on which the family member may record the activities performed and number of hours contributed. The effective date of the community service requirement will be the first of the month following a 30-day notice.</p>	<p>If an exempt individual becomes nonexempt during the 12-month lease term; it the family must report this change to SLHA within thirty (30) days from the date the change takes effect. Within thirty (30) days of a family reporting such a change, or SLHA determining such a change is necessary, SLHA will provide a copy of the community service policy, as well as a documentation form on which the family member may record the activities performed and number of hours contributed. The effective date of the community service requirement will be the first of the month following a 30-day notice.</p>
<p>Chapter 24 Community Service</p> <p>24.5 Determination of Exemption Status and Compliance</p> <p>24.5.2 Change in Status between Annual Determinations</p> <p>24.5.2.2 Nonexempt to Exempt Status</p>	<p>If a nonexempt person becomes exempt during the 12-month lease term, it is the family’s responsibility to report this change to SLHA within 30 days. Any claim of exemption will be verified by SLHA.</p>	<p>If a nonexempt person becomes exempt during the 12-month lease term, it is the family must If a nonexempt person becomes exempt during the 12-month lease term, it is the family’s responsibility to report this change to SLHA within 30 days. Any claim of exemption will be verified by SLHA.</p>

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<p>Chapter 24 Community Service</p> <p>24.6 Documentation and Verification</p> <p>24.6.2 Documentation and Verification of Compliance</p>	<p>If anyone in the family is subject to the community service requirement, SLHA will provide the family with community service documentation forms at admission, at lease renewal, when a family member becomes subject to the community service requirement during the lease term, or upon request of the family. Each individual who is subject to the requirement will be required to record their community service or self-sufficiency activities and the number of hours contributed on the required form. The certification form will also include places for signatures and phone numbers of supervisors, instructors, and counselors certifying the number of hours contributed.</p>	<p>If anyone in the family is subject to the community service requirement, SLHA will provide the family with community service documentation forms at admission, at lease renewal, when a family member becomes subject to the community service requirement during the lease term, or upon request of the family. Each individual who is subject to the requirement will be required to record their community service or self-sufficiency activities and the number of hours contributed on the required form. The certification form will also include places for signatures and phone numbers of supervisors, instructors, and counselors certifying the number of hours contributed. Self-certification will not be accepted.</p>
<p>ACOP APPENDIX 2</p> <p>Income Limits</p>		<p>SEE ATTACHMENT</p>
<p>ACOP APPENDIX 3</p> <p>Flat Rent Schedule</p>		<p>SEE ATTACHMENT</p>

**St. Louis Housing Authority
INCOME LIMITS**

**FY 2024 Income Limits
Median Family Income \$103,200**

No. of Persons	1	2	3	4	5	6	7	8	9	10	11	12
Extremely Low Income (30%) Limit	\$21,700	\$24,800	\$27,900	\$31,200	\$36,580	\$41,960	\$47,340	\$52,720	\$58,100	\$63,480	\$68,860	\$74,240
Very Low (50%) Income Limit	\$36,150	\$41,300	\$46,450	\$51,600	\$55,750	\$59,900	\$64,000	\$68,150	\$72,250	\$76,400	\$80,500	\$84,650
Low (80%) Income Limit	\$57,800	\$66,050	\$74,300	\$82,550	\$89,200	\$95,800	\$102,400	\$109,000	\$115,600	\$122,200	\$128,800	\$135,400
Over-Income (120%) Income Limit	\$86,760	\$99,120	\$111,480	\$123,840	\$133,800	\$143,760	\$153,600	\$139,440	\$173,400	\$183,360	\$193,200	\$203,160

NOTE: The above income limits are effective as of April 1, 2024 and subject to change as HUD generally revises these limits annually.

The latest and most recent annual income limits as established and approved by HUD shall be applicable and are automatically incorporated into and made a part of this policy as of the effective date of the newly established income limits as set forth and approved by HUD. As Income Limits are revised and modified by HUD and adopted by the SLHA Board of Commissioners through board resolution, they will be posted at each development.

Development	Current Flat Rent	Comp. Rent	Comp. Rent	Comp. Rent	Average Comp. Rent	80% minus UA	80% FMR Increase No Increase Decrease
						80% minus UA	2024 Proposed Flat Rent
James House							
0 bdrm	\$809	\$986	\$601	\$614	\$734	\$742	\$742
1 bdrm	\$864	\$1,058	\$815	\$758	\$877	\$778	\$877
West Pine							
1 bdrm	\$1,067	\$1,238	\$1,327	\$1,617	\$1,394	\$778	\$1,117
2 bdrm	\$1,132	\$1,906	\$2,062	\$1,597	\$1,855	\$967	\$1,182
Parkview							
0 bdrm	\$893	\$994	\$904	\$943	\$947	\$742	\$943
1 bdrm	\$1,019	\$1,376	\$1,678	\$1,665	\$1,573	\$778	\$1,069
Kingsbury Terrace							
1 bdrm*	\$524	\$1,164	\$1,338	\$1,308	\$1,270	\$778	\$568
2 bdrm*	\$616	\$1,702	\$1,518	\$1,561	\$1,594	\$967	\$668
Euclid Plaza							
0 bdrm	\$675	\$1,010	\$697	\$1,561	\$1,089	\$742	\$725
1 bdrm	\$735	\$982	\$794	\$706	\$827	\$778	\$785
2 bdrm	\$874	\$932	\$977	\$927	\$945	\$967	\$924
Badenfest							
1 bdrm	\$614	\$728	\$873	\$634	\$745	\$654	\$664
2 bdrm	\$773	\$874	\$932	\$1,218	\$1,008	\$816	\$823
Badenhaus							
0 bdrm	\$653	\$994	\$559	\$617	\$723	\$742	\$703
1 bdrm	\$646	\$718	\$743	\$766	\$742	\$778	\$778
Cochran Plaza							
2 bdrm twnhm	\$1,009	\$1,210	\$781	\$843	\$945	\$807	\$1,059
3 bdrm twnhm	\$1,119	\$1,930	\$885	\$860	\$1,225	\$1,063	\$1,169
4 bdrm twnhm	\$1,178	\$3,061	\$1,570	\$1,610	\$2,080	\$1,221	\$1,228
5 bdrm twnhm	\$1,314	\$2,421	\$1,595	\$1,634	\$1,883	\$1,412	\$1,364
6 bdrm twnhm	\$1,457	\$2,575	\$2,890	\$1,965	\$2,477	\$1,595	\$1,507
LaSalle Park							
2 bdrm	\$1,104	\$1,466	\$1,375	\$1,209	\$1,350	\$807	\$1,154
3 bdrm	\$1,275	\$1,974	\$1,915	\$1,790	\$1,893	\$1,063	\$1,325
4 bdrm	\$1,325	\$2,070	\$2,493	\$2,043	\$2,202	\$1,221	\$1,375
Clinton Peabody							
1 bdrm	\$968	\$1,190	\$1,220	\$1,163	\$1,191	\$645	\$1,018
2 bdrm	\$1,150	\$1,178	\$1,767	\$1,195	\$1,380	\$807	\$1,200
3 bdrm	\$1,225	\$1,435	\$1,309	\$2,150	\$1,631	\$1,063	\$1,275
4 bdrm	\$1,275	\$1,870	\$1,339	\$1,295	\$1,501	\$1,221	\$1,325
5 bdrm	\$1,325	\$1,993	\$4,748	\$2,290	\$3,010	\$1,412	\$1,412
6 bdrm	-	\$2,418	\$5,679	\$5,779	\$4,625	\$1,595	\$1,595
Lafayette Apartments							
0 bdrm	\$908	\$1,001	\$964	\$809	\$925	\$742	\$925
1 bdrm	\$964	\$1,397	\$1,409	\$1,316	\$1,374	\$778	\$1,014
California Gardens							
0 bdrm	\$636	\$753	\$578	\$698	\$676	\$742	\$742
1 bdrm	\$697	\$733	\$722	\$761	\$739	\$778	\$778
Armand & Ohio							
3 bdrm	\$1,112	\$2,005	\$2,098	\$1,890	\$1,998	\$1,058	\$1,162
5 bdrm twnhm	\$1,325	\$2,604	\$2,888	\$3,152	\$2,881	\$1,405	\$1,405
Lafayette Town							
1 bdrm	\$901	\$1,107	\$1,162	\$933	\$1,067	\$667	\$951
2 bdrm	\$1,051	\$1,472	\$1,340	\$1,195	\$1,336	\$834	\$1,101
3 bdrm	\$1,225	\$1,875	\$1,936	\$1,954	\$1,922	\$1,097	\$1,275
Tiffany Turnkey							
1 bdrm	\$837	\$892	\$835	\$788	\$838	\$667	\$887
2 bdrm	\$1,007	\$1,185	\$1,236	\$1,252	\$1,224	\$834	\$1,057
Folsom							
2 bdrm	\$674	\$1,340	\$1,105	\$1,216	\$1,220	\$834	\$834
3 bdrm	\$1,087	\$1,460	\$1,389	\$1,194	\$1,348	\$1,097	\$1,137
4 bdrm	\$1,235	\$2,095	\$1,551	\$1,279	\$1,642	\$1,265	\$1,285

Development	Current Flat Rent	Comp. Rent	Comp. Rent	Comp. Rent	Average Comp. Rent	80% FMR Increase	
						80% minus UA	2024 Proposed Flat Rent
Marie Fanger							
2 bdrm	\$1,111	\$1,720	\$1,415	\$1,580	\$1,572	\$834	\$1,161
3 bdrm	\$1,225	\$1,551	\$1,708	\$1,499	\$1,586	\$1,097	\$1,275
4 bdrm	\$1,225	\$1,576	\$2,346	\$3,249	\$2,390	\$1,265	\$1,275
South Broadway							
3 bdrm	\$1,100	\$1,311	\$1,656	\$1,335	\$1,434	\$1,097	\$1,150
McMillan Manor							
3 bdrm	\$1,025	\$2,063	\$1,751	\$2,338	\$2,051	\$1,063	\$1,075
4 bdrm	\$1,275	\$2,056	\$2,463	\$2,101	\$2,207	\$1,221	\$1,325
McMillan Manor II							
3 bdrm	\$1,120	\$1,905	\$1,960	\$1,935	\$1,933	\$1,058	\$1,170
4 bdrm	\$1,275	\$1,493	\$1,771	\$1,636	\$1,633	\$1,215	\$1,325
Samuel Shepard							
2 bdrm	\$859	\$900	\$610	\$823	\$778	\$834	\$834
3 bdrm	\$1,100	\$1,808	\$1,768	\$1,772	\$1,783	\$1,097	\$1,150
4 bdrm	\$1,207	\$1,230	\$1,202	\$1,080	\$1,171	\$1,265	\$1,171
Page Manor							
3 bdrm	\$895	\$1,730	\$1,325	\$1,671	\$1,575	\$1,063	\$1,063
4 bdrm	\$1,040	\$1,297	\$1,235	\$1,173	\$1,235	\$1,221	\$1,090
Hodiamont							
2 bdrm	\$784	\$1,104	\$947	\$1,095	\$1,049	\$834	\$834
3 bdrm	\$918	\$1,288	\$1,455	\$1,256	\$1,333	\$1,097	\$1,097
4 bdrm	\$1,151	\$1,544	\$1,172	\$1,155	\$1,290	\$1,265	\$1,201
Towne XV							
3 bdrm	\$1,087	\$1,585	\$1,890	\$1,015	\$1,497	\$1,069	\$1,137
Cupples							
3 bdrm	\$915	\$1,077	\$943	\$1,015	\$1,012	\$1,097	\$1,097
4 bdrm	\$1,058	\$1,366	\$1,008	\$1,265	\$1,213	\$1,265	\$1,265
Walnut Park							
3 bdrm	\$895	\$1,055	\$1,373	\$1,272	\$1,233	\$1,063	\$1,063
5 bdrm	\$1,292	\$2,346	\$2,515	\$2,439	\$2,433	\$1,412	\$1,412
Lookaway							
3 bdrm	\$1,095	\$1,258	\$1,210	\$1,080	\$1,183	\$1,063	\$1,145
4 bdrm	\$1,133	\$1,784	\$1,510	\$1,753	\$1,682	\$1,221	\$1,221
King Louis Square III							
1 bdrm garden	\$810	\$909	\$1,192	\$920	\$1,007	\$675	\$860
3 bdrm twnhm	\$1,150	\$2,230	\$2,341	\$1,989	\$2,187	\$1,071	\$1,200
4 bdrm twnhm	\$1,175	\$2,101	\$2,075	\$2,558	\$2,245	\$1,227	\$1,227
Murphy Park I							
2 bdrm garden*	\$964	\$1,251	\$1,166	\$898	\$1,105	\$834	\$964
2 bdrm twnhm*	\$964	\$1,423	\$1,250	\$915	\$1,196	\$807	\$964
3 bdrm garden*	\$1,114	\$1,701	\$1,375	\$1,370	\$1,482	\$1,097	\$1,114
3 bdrm twnhm*	\$1,114	\$2,009	\$1,024	\$1,260	\$1,431	\$1,063	\$1,114
4 bdrm twnhm*	\$1,243	\$3,000	\$2,829	\$2,787	\$2,872	\$1,221	\$1,243
5 bdrm twnhm - PH**	\$1,425	\$2,543	\$2,780	\$1,765	\$2,363	\$1,412	\$1,475
6 bdrm twnhm - PH**	\$1,425	\$2,717	\$3,262	\$3,290	\$3,090	\$1,595	\$1,595
Murphy Park II							
2 bdrm garden*	\$952	\$1,251	\$1,166	\$898	\$1,105	\$834	\$1,002
2 bdrm twnhm*	\$952	\$1,423	\$1,250	\$915	\$1,196	\$807	\$1,002
3 bdrm garden*	\$1,042	\$1,701	\$1,375	\$1,370	\$1,482	\$1,097	\$1,097
3 bdrm twnhm*	\$955	\$2,009	\$1,024	\$1,260	\$1,431	\$1,063	\$1,063
4 bdrm twnhm*	\$1,254	\$3,000	\$2,829	\$2,787	\$2,872	\$1,221	\$1,304
Murphy Park III							
2 bdrm garden*	\$872	\$1,251	\$1,166	\$898	\$1,105	\$834	\$872
2 bdrm twnhm*	\$880	\$1,423	\$1,250	\$915	\$1,196	\$807	\$880
3 bdrm garden*	\$946	\$1,701	\$1,375	\$1,370	\$1,482	\$1,097	\$946
3 bdrm twnhm*	\$946	\$2,009	\$1,024	\$1,260	\$1,431	\$1,063	\$946
4 bdrm twnhm - PH**	\$1,322	\$3,000	\$2,829	\$2,787	\$2,872	\$1,221	\$1,372
5 bdrm twnhm - PH**	\$1,465	\$2,543	\$2,780	\$1,765	\$2,363	\$1,412	\$1,515
6 bdrm twnhm - PH**	\$1,481	\$2,717	\$3,262	\$3,290	\$3,090	\$1,595	\$1,595

Development	Current Flat Rent	Comp. Rent	Comp. Rent	Comp. Rent	Average Comp. Rent	80% FMR	
						80% minus UA	Increase No Increase Decrease
						2024 Proposed Flat Rent	
Renaissance PI @ Grand							
1 bdrm garden*	\$708	\$1,006	\$1,147	\$1,027	\$1,060	\$667	\$708
2 bdrm garden*	\$849	\$1,042	\$1,225	\$923	\$1,063	\$834	\$849
2 bdrm twnhm*	\$849	\$1,470	\$1,449	\$1,382	\$1,434	\$807	\$849
3 bdrm twnhm - PH**	\$1,160	\$2,062	\$1,840	\$2,163	\$2,022	\$1,063	\$1,210
4 bdrm twnhm - PH**	\$1,225	\$2,471	\$3,097	\$1,610	\$2,393	\$1,221	\$1,275
5 bdrm twnhm - PH**	\$1,374	\$2,475	\$1,697	\$1,658	\$1,943	\$1,412	\$1,424
Renaissance PI @ Grand II							
1 bdrm garden*	\$708	\$1,006	\$1,147	\$1,027	\$1,060	\$667	\$708
2 bdrm garden*	\$830	\$1,042	\$1,225	\$923	\$1,063	\$834	\$830
2 bdrm twnhm*	\$830	\$1,470	\$1,449	\$1,382	\$1,434	\$807	\$830
3 bdrm twnhm*	\$959	\$2,062	\$1,840	\$2,163	\$2,022	\$1,063	\$959
4 bdrm twnhm - PH**	\$1,175	\$2,471	\$3,097	\$1,610	\$2,393	\$1,221	\$1,225
5 bdrm twnhm - PH**	\$1,374	\$2,475	\$1,697	\$1,658	\$1,943	\$1,412	\$1,424
Renaissance PI @ Grand III							
1 bdrm garden*	\$658	\$1,006	\$1,147	\$1,027	\$1,060	\$667	\$658
2 bdrm garden*	\$772	\$1,042	\$1,225	\$923	\$1,063	\$834	\$772
2 bdrm twnhm*	\$823	\$1,470	\$1,449	\$1,382	\$1,434	\$807	\$823
3 bdrm twnhm*	\$948	\$2,062	\$1,840	\$2,163	\$2,022	\$1,063	\$948
4 bdrm twnhm - PH**	\$1,260	\$2,471	\$3,097	\$1,610	\$2,393	\$1,221	\$1,310
5 bdrm twnhm - PH**	\$1,374	\$2,475	\$1,697	\$1,658	\$1,943	\$1,412	\$1,424
Gardens @ Renaissance							
1 bdrm garden*	\$744	\$1,035	\$1,073	\$1,048	\$1,052	\$778	\$744
2 bdrm garden - PH**	\$932	\$1,023	\$1,361	\$1,410	\$1,265	\$967	\$982
Senior Living @ Renaissance							
1 bdrm garden*	\$746	\$1,136	\$1,176	\$1,119	\$1,144	\$778	\$746
2 bdrm garden - PH**	\$972	\$1,023	\$1,391	\$1,391	\$1,268	\$967	\$1,022
King Louis Square							
1 bdrm garden*	\$531	\$1,245	\$931	\$960	\$1,045	\$667	\$531
2 bdrm grdn/twnhm*	\$663	\$1,649	\$1,604	\$1,533	\$1,595	\$807	\$663
3 bdrm grdn/twnhm*	\$777	\$1,555	\$1,287	\$1,728	\$1,523	\$1,063	\$777
4 bdrm twnhm - PH**	\$1,158	\$1,720	\$2,430	\$3,000	\$2,383	\$1,221	\$1,208
King Louis Square II (Old Frenchtown)							
1 bdrm garden*	\$572	\$1,170	\$1,165	\$1,095	\$1,143	\$675	\$572
2 bdrm garden*	\$704	\$1,489	\$1,348	\$1,160	\$1,332	\$841	\$704
3 bdrm twnhm*	\$830	\$1,975	\$1,858	\$2,024	\$1,952	\$1,071	\$830
LesChateaux							
1 bdrm	\$804	\$1,335	\$1,328	\$1,223	\$1,295	\$778	\$804
2 bdrm	\$964	\$1,369	\$1,243	\$1,396	\$1,336	\$967	\$964
Cahill House							
1 bdrm garden*	\$732	\$850	\$789	\$775	\$805	\$778	\$732
2 bdrm garden - PH**	\$867	\$808	\$1,355	\$1,576	\$1,246	\$967	\$967
Cambridge Heights I							
1 bdrm garden*	\$583	\$628	\$710	\$551	\$630	\$675	\$583
2 bdrm garden*	\$715	\$1,137	\$835	\$722	\$898	\$841	\$715
2 bdrm twnhm*	\$772	\$1,270	\$915	\$960	\$1,048	\$816	\$772
3 bdrm twnhm*	\$910	\$956	\$981	\$1,380	\$1,106	\$1,071	\$910
4 bdrm twnhm - PH**	\$1,274	\$3,139	\$1,648	\$1,285	\$2,024	\$1,227	\$1,324
5 bdrm twnhm - PH**	\$1,290	\$1,696	\$1,735	\$1,530	\$1,654	\$1,414	\$1,414
Cambridge Heights II							
1 bdrm garden*	\$606	\$628	\$710	\$551	\$630	\$675	\$606
2 bdrm garden*	\$786	\$1,137	\$835	\$722	\$898	\$841	\$786
2 bdrm twnhm*	\$812	\$1,270	\$915	\$960	\$1,048	\$816	\$812
3 bdrm twnhm*	\$910	\$956	\$981	\$1,380	\$1,106	\$1,071	\$910
4 bdrm twnhm - PH**	\$1,274	\$3,139	\$1,648	\$1,285	\$2,024	\$1,227	\$1,324
5 bdrm twnhm - PH**	\$1,290	\$1,696	\$1,735	\$1,530	\$1,654	\$1,414	\$1,414
Cambridge Senior							
1 bdrm garden*	\$667	\$582	\$681	\$885	\$716	\$778	\$667
2 bdrm garden	\$867	\$920	\$918	\$1,009	\$949	\$967	\$917

Development	Current Flat Rent	Comp. Rent	Comp. Rent	Comp. Rent	Average Comp. Rent	80% FMR	
						80% minus UA	Increase No Increase Decrease
							2024 Proposed Flat Rent
Arlington Grove							
2 brdm twnhm*	\$749	\$1,185	\$978	\$1,115	\$1,093	\$803	\$749
3 brdm twnhm*	\$856	\$1,523	\$1,378	\$1,391	\$1,431	\$1,058	\$856
North Sarah							
1 brdm garden*	\$640	\$1,016	\$1,068	\$872	\$985	\$664	\$640
2 brdm twnhm*	\$749	\$1,150	\$1,150	\$1,150	\$1,150	\$803	\$749
3 brdm twnhm*	\$855	\$1,238	\$2,775	\$1,530	\$1,848	\$1,058	\$855
North Sarah II							
1 brdm garden*	\$600	\$1,016	\$1,068	\$872	\$985	\$664	\$600
2 brdm twnhm*	\$700	\$1,150	\$1,150	\$1,150	\$1,150	\$803	\$700
3 brdm twnhm*	\$800	\$1,238	\$2,775	\$1,530	\$1,848	\$1,058	\$800
North Sarah III							
1 brdm garden*	\$600	\$1,016	\$1,068	\$872	\$985	\$664	\$600
2 brdm twnhm*	\$700	\$1,150	\$1,150	\$1,150	\$1,150	\$803	\$700
3 brdm twnhm*	\$800	\$1,238	\$2,775	\$1,530	\$1,848	\$1,058	\$800
Preservation Square I							
2 brdm garden*	\$808	\$1,597	\$1,913	\$1,097	\$1,536	\$816	\$808
2 brdm twnhm*	\$1,005	\$1,253	\$1,329	\$1,479	\$1,354	\$841	\$1,005
3 brdm garden*	\$1,019	\$1,771	\$1,720	\$1,400	\$1,630	\$1,102	\$1,019
* Tax Credit Max							
** PH Unit, not Tax Credit							

St. Louis Housing Authority (SLHA)
Public Hearing Comments and Responses
Admissions and Continued Occupancy Policy (ACOP)
Utility Allowance Schedule FFY 2024
Rent Determination: Flat Rent Comparable

The St. Louis Housing Authority issued the proposed Agency Plan for public comments on May 3, 2024 for a 45-day comment period. Speakers' comments were formally recorded at the Public Hearing held on June 17, 2024. A summary of the comments and the Agency's responses to the comments are listed below.

COMMENTS TO THE ADMISSIONS AND CONTINUED OCCUPANCY POLICY:

On June 12, 2024, Paul Werner, Director of Operations for Public Housing, incorporated additional language into Chapter 22 of the ACOP matrix. Specifically, 22.1 Lease Terminations and 22.1.2.1 Mandatory Termination to be consistent with the HUD FAQ published in January 2022.

Additionally, Chapter 6, Tenant Selection, was modified to add a point value for victims of domestic violence under Section 6.6, Order of Selection. When the draft plan was published, a number value had not been determined.

Reference ACOP Matrix/Attachment #3C of the Agency Plan.

SLHA Response:

A revised ACOP matrix has been inserted in Attachment #3C, Changes to Admissions and Continued Occupancy Policy – ACOP, to incorporate all changes.

COMMENTS TO THE UTILITY ALLOWANCE SCHEDULE

No comments were received during the 45-day comment period.

COMMENTS TO THE FLAT RENT SCHEDULE

No comments were received during the 45-day comment period.

RESOLUTION No. 3010



Asset Management Department

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MEMORANDUM

To: Board of Commissioners

Through: Latasha K. Barnes, Acting Executive Director

From: Paul Werner, Director of Operations for Public Housing

Date: June 12, 2024

Subject: Resolution No. 3010
Authorizing and Approving the Allowances for Tenant-Furnished Utilities and Other Services for the Public Housing Program

In accordance with HUD regulations, Public Housing Authorities are required to revise the utility allowance schedule if there is a change in the utility rate of 10 percent or more from the rate on which the allowance was based.

Board approval is requested for the proposed utility allowance schedule.

**AUTHORIZING AND APPROVING THE ALLOWANCES FOR TENANT FURNISHED UTILITIES
AND OTHER SERVICES FOR PUBLIC HOUSING**

WHEREAS, it is necessary to revise the Tenant-Furnished Utility Allowances for Public Housing to be consistent with current utility rates and regulatory requirements; and

WHEREAS, the attached Tenant-Furnished Utility Allowances replace the previous utility allowances; and

WHEREAS, the attached Tenant-Furnished Utility Allowances comply with all Federal rules and regulations; and

WHEREAS, the utility allowances will be implemented on all recertifications entered into the St. Louis Housing Authority's computer system on July 1, 2024.

NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF COMMISSIONERS OF THE ST. LOUIS HOUSING AUTHORITY THAT:

1. The attached 2024 Tenant-Furnished Utility Allowance schedule for the Public Housing Program is hereby adopted and approved.
2. The Executive Director is hereby directed to take all actions necessary to implement the Tenant-Furnished Utility Allowances.

Clinton Peabody	Bedroom 1	Bedroom 2	Bedroom 3	Bedroom 4	Bedroom 5	Bedroom 6
Utility Allowances						
Total Gas	\$79	\$94	\$110	\$135	\$151	\$170
Total Electric	\$54	\$66	\$79	\$98	\$110	\$126
Total	\$133	\$160	\$189	\$233	\$261	\$296
Cochran Plaza	Bedroom 1	Bedroom 2	Bedroom 3	Bedroom 4	Bedroom 5	Bedroom 6
Utility Allowances						
Total Gas		\$94	\$110	\$135	\$151	\$170
Total Electric		\$66	\$79	\$98	\$110	\$126
Total		\$160	\$189	\$233	\$261	\$296
Towne XV	Bedroom 1	Bedroom 2	Bedroom 3	Bedroom 4	Bedroom 5	Bedroom 6
Utility Allowances						
Total Gas			\$106			
Total Electric			\$77			
Total			\$183			
McMillan Manor	Bedroom 1	Bedroom 2	Bedroom 3	Bedroom 4	Bedroom 5	Bedroom 6
Utility Allowances						
Total Gas			\$110	\$135		
Total Electric			\$79	\$98		
Total			\$189	\$233		
Mc Millan Manor II	Bedroom 1	Bedroom 2	Bedroom 3	Bedroom 4	Bedroom 5	Bedroom 6
Utility Allowances						
Total Gas			\$100	\$122		
Total Electric			\$94	\$117		
Total			\$194	\$239		
Page Manor	Bedroom 1	Bedroom 2	Bedroom 3	Bedroom 4	Bedroom 5	Bedroom 6
Utility Allowances						
Total Gas			\$110	\$135		
Total Electric			\$79	\$98		
Total			\$189	\$233		
LaSalle Park	Bedroom 1	Bedroom 2	Bedroom 3	Bedroom 4	Bedroom 5	Bedroom 6
Utility Allowances						
Total Gas		\$94	\$110	\$135		
Total Electric		\$66	\$79	\$98		
Total		\$160	\$189	\$233		
Armand & Ohio	Bedroom 1	Bedroom 2	Bedroom 3	Bedroom 4	Bedroom 5	Bedroom 6
Utility Allowances						
Total Gas			\$100		\$136	
Total Electric			\$94		\$132	
Total			\$194		\$268	
Folsom	Bedroom 1	Bedroom 2	Bedroom 3	Bedroom 4	Bedroom 5	Bedroom 6
Utility Allowances						
Total Gas		\$76	\$88	\$106		
Total Electric		\$57	\$67	\$83		
Total		\$133	\$155	\$189		
Samuel Shepard	Bedroom 1	Bedroom 2	Bedroom 3	Bedroom 4	Bedroom 5	Bedroom 6
Utility Allowances						
Total Gas		\$76	\$88	\$106		
Total Electric		\$57	\$67	\$83		
Total		\$133	\$155	\$189		
Marie Fanger	Bedroom 1	Bedroom 2	Bedroom 3	Bedroom 4	Bedroom 5	Bedroom 6
Utility Allowances						
Total Gas		\$76	\$88	\$106		
Total Electric		\$57	\$67	\$83		
Total		\$133	\$155	\$189		

Cupples		Bedroom 1	Bedroom 2	Bedroom 3	Bedroom 4	Bedroom 5	Bedroom 6
Utility Allowances							
Total Gas				\$88	\$106		
Total Electric				\$67	\$83		
Total				\$155	\$189		
Hodiamont		Bedroom 1	Bedroom 2	Bedroom 3	Bedroom 4	Bedroom 5	Bedroom 6
Utility Allowances							
Total Gas			\$76	\$88	\$106		
Total Electric			\$57	\$67	\$83		
Total			\$133	\$155	\$189		
Badenfest		Bedroom 1	Bedroom 2	Bedroom 3	Bedroom 4	Bedroom 5	Bedroom 6
Utility Allowances							
Total Gas							
Total Electric		\$124	\$151				
Total		\$124	\$151				
South Boardway		Bedroom 1	Bedroom 2	Bedroom 3	Bedroom 4	Bedroom 5	Bedroom 6
Utility Allowances							
Total Gas				\$88			
Total Electric				\$67			
Total				\$155			
Walnut Park		Bedroom 1	Bedroom 2	Bedroom 3	Bedroom 4	Bedroom 5	Bedroom 6
Utility Allowances							
Total Gas				\$110		\$151	
Total Electric				\$79		\$110	
Total				\$189		\$261	
Lookaway		Bedroom 1	Bedroom 2	Bedroom 3	Bedroom 4	Bedroom 5	Bedroom 6
Utility Allowances							
Total Gas				\$110	\$135		
Total Electric				\$79	\$98		
Total				\$189	\$233		
Lafayette Town		Bedroom 1	Bedroom 2	Bedroom 3	Bedroom 4	Bedroom 5	Bedroom 6
Utility Allowances							
Total Gas		\$65	\$76	\$88			
Total Electric		\$46	\$57	\$67			
Total		\$111	\$133	\$155			
Tiffany Turnkey		Bedroom 1	Bedroom 2	Bedroom 3	Bedroom 4	Bedroom 5	Bedroom 6
Utility Allowances							
Total Gas		\$65	\$76				
Total Electric		\$46	\$57				
Total		\$111	\$133				
King Louis Square III		Bedroom 1	Bedroom 2	Bedroom 3	Bedroom 4	Bedroom 5	Bedroom 6
Utility Allowances							
Total Gas							
Total Electric		\$103		\$181	\$227		
Total		\$103		\$181	\$227		

Murphy Park I,II & III	Unit Type	Bedroom 1	Bedroom 2	Bedroom 3	Bedroom 4	Bedroom 5	Bedroom 6
Utility Allowances			Garden	Garden			
Total Gas			\$76	\$88			
Total Electric			\$57	\$67			
Total			\$133	\$155			
Murphy Park I,II & III	Unit Type	Bedroom 1	Bedroom 2	Bedroom 3	Bedroom 4	Bedroom 5	Bedroom 6
Utility Allowances			Townhouse	Townhouse	Townhouse	Townhouse	Townhouse
Total Gas			\$94	\$110	\$135	\$151	\$170
Total Electric			\$66	\$79	\$98	\$110	\$126
Total			\$160	\$189	\$233	\$261	\$296
King Louis Square I	Unit Type	Bedroom 1	Bedroom 2	Bedroom 3	Bedroom 4	Bedroom 5	Bedroom 6
Utility Allowances		Garden	Townhouse	Townhouse	Townhouse		
Total Gas		\$65	\$94	\$110	\$135		
Total Electric		\$46	\$66	\$79	\$98		
Total		\$111	\$160	\$189	\$233		
King Louis Square II	Unit Type	Bedroom 1	Bedroom 2	Bedroom 3	Bedroom 4	Bedroom 5	Bedroom 6
Utility Allowances		Garden	Garden	Townhouse			
Total Gas		\$0	\$0	\$0			
Total Electric		\$103	\$126	\$181			
Total		\$103	\$126	\$181			
Renaissance Place I, II, III	Unit Type	Bedroom 1	Bedroom 2	Bedroom 2	Bedroom 3	Bedroom 4	Bedroom 5
Utility Allowances		Garden	Garden	Townhouse	Townhouse	Townhouse	Townhouse
Total Gas		\$65	\$76	\$94	\$110	\$135	\$151
Total Electric		\$46	\$57	\$66	\$79	\$98	\$110
Total		\$111	\$133	\$160	\$189	\$233	\$261
Cambridge Heights I & II	Unit Type	Bedroom 1	Bedroom 2	Bedroom 2	Bedroom 3	Bedroom 4	Bedroom 5
Utility Allowances		Garden	Garden	Townhouse	Townhouse	Townhouse	Townhouse
Total Gas		\$0	\$0	\$0	\$0	\$0	\$0
Total Electric		\$103	\$126	\$151	\$181	\$227	\$259
Total		\$103	\$126	\$151	\$181	\$227	\$259
Arlington Grove	Unit Type	Bedroom 1	Bedroom 2	Bedroom 3	Bedroom 4	Bedroom 5	Bedroom 6
Utility Allowances			Towhhouse	Townhouse			
Total Gas			\$86	\$100			
Total Electric			\$78	\$94			
Total			\$164	\$194			
North Sarah	Unit Type	Bedroom 1	Bedroom 2	Bedroom 3	Bedroom 4	Bedroom 5	Bedroom 6
Utility Allowances		Garden	Towhhouse	Townhouse			
Total Gas		\$58	\$86	\$100			
Total Electric		\$56	\$78	\$94			
Total		\$114	\$164	\$194			
Preservation Square	Unit Type	Bedroom 1	Bedroom 2	Bedroom 3	Bedroom 4	Bedroom 5	Bedroom 6
Utility Allowances			Towhhouse	Garden	Garden		
Total Gas			\$0	\$0	\$0		
Total Electric			\$151	\$126	\$150		
Total			\$151	\$126	\$150		

RESOLUTION No. 3011



Asset Management Department

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MEMORANDUM

To: Board of Commissioners

Through: Latasha Barnes, Acting Executive Director

From: Paul Werner, Director of Operations for Public Housing

Date: June 12, 2024

Subject: Resolution No. 3011
Authorizing and Approving the Flat Rent Schedule for the Public Housing Program

Sections 210 and 243 of Title II of P.L. 113-76, the Consolidated Appropriations Act of 2014, established new parameters that housing authorities must use when determining flat rent amounts. Specifically, flat rents must now be set at no less than 80% of the applicable Fair Market Rent (FMR). The St. Louis Housing Authority revised the flat rent schedules to be consistent with the statutory requirements and submitted the proposed flat rent schedules for public review for 45 days, concurrent with the Agency Plan.

Board approval is requested for the proposed Flat Rent Schedule for the Public Housing Program.

Authorizing and Approving the Proposed Flat Rent Schedule for the Public Housing Program

WHEREAS, it is necessary to revise the Flat Rent Schedule for the Public Housing program to be consistent with current utility rates and regulatory requirements; and

WHEREAS, the St. Louis Housing Authority (SLHA) has worked in collaboration with the St. Louis Tenant Affairs Board and conducted planning meetings to obtain comments on the proposed Flat Rent Schedule; and

WHEREAS, SLHA has published notices and made the proposed Flat Rent Schedule available for inspection and public comment for a period of 45 days prior to the Public Hearing; and

WHEREAS, SLHA conducted a Public Hearing on June 17, 2024 to obtain public comments regarding the revisions to the proposed Flat Rent Schedule; and

WHEREAS, SLHA has considered all comments and recommendations received and has incorporated all relevant changes to the proposed Flat Rent Schedule; and

WHEREAS, the attached Flat Rent Schedule replaces the previous Flat Rent Schedule; and

WHEREAS, the attached Flat Rent Schedule complies with all Federal rules and regulations; and

WHEREAS, the flat rents will be implemented on leases effective on or after July 1, 2024.

NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF COMMISSIONERS OF THE ST. LOUIS HOUSING AUTHORITY THAT:

1. The attached 2024 Flat Rent Schedule for the Public Housing Program is hereby adopted and approved.
2. The Executive Director is hereby directed to take all actions necessary to implement the Flat Rent Schedule for the Public Housing Program.

Development	Current Flat Rent	Comp. Rent	Comp. Rent	Comp. Rent	Average Comp. Rent	80% minus UA	80% FMR Increase No Increase Decrease
						80% minus UA	2024 Proposed Flat Rent
James House							
0 bdrm	\$809	\$986	\$601	\$614	\$734	\$742	\$742
1 bdrm	\$864	\$1,058	\$815	\$758	\$877	\$778	\$877
West Pine							
1 bdrm	\$1,067	\$1,238	\$1,327	\$1,617	\$1,394	\$778	\$1,117
2 bdrm	\$1,132	\$1,906	\$2,062	\$1,597	\$1,855	\$967	\$1,182
Parkview							
0 bdrm	\$893	\$994	\$904	\$943	\$947	\$742	\$943
1 bdrm	\$1,019	\$1,376	\$1,678	\$1,665	\$1,573	\$778	\$1,069
Kingsbury Terrace							
1 bdrm*	\$524	\$1,164	\$1,338	\$1,308	\$1,270	\$778	\$568
2 bdrm*	\$616	\$1,702	\$1,518	\$1,561	\$1,594	\$967	\$668
Euclid Plaza							
0 bdrm	\$675	\$1,010	\$697	\$1,561	\$1,089	\$742	\$725
1 bdrm	\$735	\$982	\$794	\$706	\$827	\$778	\$785
2 bdrm	\$874	\$932	\$977	\$927	\$945	\$967	\$924
Badenfest							
1 bdrm	\$614	\$728	\$873	\$634	\$745	\$654	\$664
2 bdrm	\$773	\$874	\$932	\$1,218	\$1,008	\$816	\$823
Badenhaus							
0 bdrm	\$653	\$994	\$559	\$617	\$723	\$742	\$703
1 bdrm	\$646	\$718	\$743	\$766	\$742	\$778	\$778
Cochran Plaza							
2 bdrm twnhm	\$1,009	\$1,210	\$781	\$843	\$945	\$807	\$1,059
3 bdrm twnhm	\$1,119	\$1,930	\$885	\$860	\$1,225	\$1,063	\$1,169
4 bdrm twnhm	\$1,178	\$3,061	\$1,570	\$1,610	\$2,080	\$1,221	\$1,228
5 bdrm twnhm	\$1,314	\$2,421	\$1,595	\$1,634	\$1,883	\$1,412	\$1,364
6 bdrm twnhm	\$1,457	\$2,575	\$2,890	\$1,965	\$2,477	\$1,595	\$1,507
LaSalle Park							
2 bdrm	\$1,104	\$1,466	\$1,375	\$1,209	\$1,350	\$807	\$1,154
3 bdrm	\$1,275	\$1,974	\$1,915	\$1,790	\$1,893	\$1,063	\$1,325
4 bdrm	\$1,325	\$2,070	\$2,493	\$2,043	\$2,202	\$1,221	\$1,375
Clinton Peabody							
1 bdrm	\$968	\$1,190	\$1,220	\$1,163	\$1,191	\$645	\$1,018
2 bdrm	\$1,150	\$1,178	\$1,767	\$1,195	\$1,380	\$807	\$1,200
3 bdrm	\$1,225	\$1,435	\$1,309	\$2,150	\$1,631	\$1,063	\$1,275
4 bdrm	\$1,275	\$1,870	\$1,339	\$1,295	\$1,501	\$1,221	\$1,325
5 bdrm	\$1,325	\$1,993	\$4,748	\$2,290	\$3,010	\$1,412	\$1,412
6 bdrm	-	\$2,418	\$5,679	\$5,779	\$4,625	\$1,595	\$1,595
Lafayette Apartments							
0 bdrm	\$908	\$1,001	\$964	\$809	\$925	\$742	\$925
1 bdrm	\$964	\$1,397	\$1,409	\$1,316	\$1,374	\$778	\$1,014
California Gardens							
0 bdrm	\$636	\$753	\$578	\$698	\$676	\$742	\$742
1 bdrm	\$697	\$733	\$722	\$761	\$739	\$778	\$778
Armand & Ohio							
3 bdrm	\$1,112	\$2,005	\$2,098	\$1,890	\$1,998	\$1,058	\$1,162
5 bdrm twnhm	\$1,325	\$2,604	\$2,888	\$3,152	\$2,881	\$1,405	\$1,405
Lafayette Town							
1 bdrm	\$901	\$1,107	\$1,162	\$933	\$1,067	\$667	\$951
2 bdrm	\$1,051	\$1,472	\$1,340	\$1,195	\$1,336	\$834	\$1,101
3 bdrm	\$1,225	\$1,875	\$1,936	\$1,954	\$1,922	\$1,097	\$1,275
Tiffany Turnkey							
1 bdrm	\$837	\$892	\$835	\$788	\$838	\$667	\$887
2 bdrm	\$1,007	\$1,185	\$1,236	\$1,252	\$1,224	\$834	\$1,057
Folsom							
2 bdrm	\$674	\$1,340	\$1,105	\$1,216	\$1,220	\$834	\$834
3 bdrm	\$1,087	\$1,460	\$1,389	\$1,194	\$1,348	\$1,097	\$1,137
4 bdrm	\$1,235	\$2,095	\$1,551	\$1,279	\$1,642	\$1,265	\$1,285

Development	Current Flat Rent	Comp. Rent	Comp. Rent	Comp. Rent	Average Comp. Rent	80% FMR	
						80% minus UA	Increase No Increase Decrease
							2024 Proposed Flat Rent
Marie Fanger							
2 bdrm	\$1,111	\$1,720	\$1,415	\$1,580	\$1,572	\$834	\$1,161
3 bdrm	\$1,225	\$1,551	\$1,708	\$1,499	\$1,586	\$1,097	\$1,275
4 bdrm	\$1,225	\$1,576	\$2,346	\$3,249	\$2,390	\$1,265	\$1,275
South Broadway							
3 bdrm	\$1,100	\$1,311	\$1,656	\$1,335	\$1,434	\$1,097	\$1,150
McMillan Manor							
3 bdrm	\$1,025	\$2,063	\$1,751	\$2,338	\$2,051	\$1,063	\$1,075
4 bdrm	\$1,275	\$2,056	\$2,463	\$2,101	\$2,207	\$1,221	\$1,325
McMillan Manor II							
3 bdrm	\$1,120	\$1,905	\$1,960	\$1,935	\$1,933	\$1,058	\$1,170
4 bdrm	\$1,275	\$1,493	\$1,771	\$1,636	\$1,633	\$1,215	\$1,325
Samuel Shepard							
2 bdrm	\$859	\$900	\$610	\$823	\$778	\$834	\$834
3 bdrm	\$1,100	\$1,808	\$1,768	\$1,772	\$1,783	\$1,097	\$1,150
4 bdrm	\$1,207	\$1,230	\$1,202	\$1,080	\$1,171	\$1,265	\$1,171
Page Manor							
3 bdrm	\$895	\$1,730	\$1,325	\$1,671	\$1,575	\$1,063	\$1,063
4 bdrm	\$1,040	\$1,297	\$1,235	\$1,173	\$1,235	\$1,221	\$1,090
Hodiamont							
2 bdrm	\$784	\$1,104	\$947	\$1,095	\$1,049	\$834	\$834
3 bdrm	\$918	\$1,288	\$1,455	\$1,256	\$1,333	\$1,097	\$1,097
4 bdrm	\$1,151	\$1,544	\$1,172	\$1,155	\$1,290	\$1,265	\$1,201
Towne XV							
3 bdrm	\$1,087	\$1,585	\$1,890	\$1,015	\$1,497	\$1,069	\$1,137
Cupples							
3 bdrm	\$915	\$1,077	\$943	\$1,015	\$1,012	\$1,097	\$1,097
4 bdrm	\$1,058	\$1,366	\$1,008	\$1,265	\$1,213	\$1,265	\$1,265
Walnut Park							
3 bdrm	\$895	\$1,055	\$1,373	\$1,272	\$1,233	\$1,063	\$1,063
5 bdrm	\$1,292	\$2,346	\$2,515	\$2,439	\$2,433	\$1,412	\$1,412
Lookaway							
3 bdrm	\$1,095	\$1,258	\$1,210	\$1,080	\$1,183	\$1,063	\$1,145
4 bdrm	\$1,133	\$1,784	\$1,510	\$1,753	\$1,682	\$1,221	\$1,221
King Louis Square III							
1 bdrm garden	\$810	\$909	\$1,192	\$920	\$1,007	\$675	\$860
3 bdrm twnhm	\$1,150	\$2,230	\$2,341	\$1,989	\$2,187	\$1,071	\$1,200
4 bdrm twnhm	\$1,175	\$2,101	\$2,075	\$2,558	\$2,245	\$1,227	\$1,227
Murphy Park I							
2 bdrm garden*	\$964	\$1,251	\$1,166	\$898	\$1,105	\$834	\$964
2 bdrm twnhm*	\$964	\$1,423	\$1,250	\$915	\$1,196	\$807	\$964
3 bdrm garden*	\$1,114	\$1,701	\$1,375	\$1,370	\$1,482	\$1,097	\$1,114
3 bdrm twnhm*	\$1,114	\$2,009	\$1,024	\$1,260	\$1,431	\$1,063	\$1,114
4 bdrm twnhm*	\$1,243	\$3,000	\$2,829	\$2,787	\$2,872	\$1,221	\$1,243
5 bdrm twnhm - PH**	\$1,425	\$2,543	\$2,780	\$1,765	\$2,363	\$1,412	\$1,475
6 bdrm twnhm - PH**	\$1,425	\$2,717	\$3,262	\$3,290	\$3,090	\$1,595	\$1,595
Murphy Park II							
2 bdrm garden*	\$952	\$1,251	\$1,166	\$898	\$1,105	\$834	\$1,002
2 bdrm twnhm*	\$952	\$1,423	\$1,250	\$915	\$1,196	\$807	\$1,002
3 bdrm garden*	\$1,042	\$1,701	\$1,375	\$1,370	\$1,482	\$1,097	\$1,097
3 bdrm twnhm*	\$955	\$2,009	\$1,024	\$1,260	\$1,431	\$1,063	\$1,063
4 bdrm twnhm*	\$1,254	\$3,000	\$2,829	\$2,787	\$2,872	\$1,221	\$1,304
Murphy Park III							
2 bdrm garden*	\$872	\$1,251	\$1,166	\$898	\$1,105	\$834	\$872
2 bdrm twnhm*	\$880	\$1,423	\$1,250	\$915	\$1,196	\$807	\$880
3 bdrm garden*	\$946	\$1,701	\$1,375	\$1,370	\$1,482	\$1,097	\$946
3 bdrm twnhm*	\$946	\$2,009	\$1,024	\$1,260	\$1,431	\$1,063	\$946
4 bdrm twnhm - PH**	\$1,322	\$3,000	\$2,829	\$2,787	\$2,872	\$1,221	\$1,372
5 bdrm twnhm - PH**	\$1,465	\$2,543	\$2,780	\$1,765	\$2,363	\$1,412	\$1,515
6 bdrm twnhm - PH**	\$1,481	\$2,717	\$3,262	\$3,290	\$3,090	\$1,595	\$1,595

Development	Current Flat Rent	Comp. Rent	Comp. Rent	Comp. Rent	Average Comp. Rent	80% FMR Increase	
						80% minus UA	No Increase
						Decrease	
						2024 Proposed Flat Rent	
Renaissance PI @ Grand							
1 bdrm garden*	\$708	\$1,006	\$1,147	\$1,027	\$1,060	\$667	\$708
2 bdrm garden*	\$849	\$1,042	\$1,225	\$923	\$1,063	\$834	\$849
2 bdrm twnhm*	\$849	\$1,470	\$1,449	\$1,382	\$1,434	\$807	\$849
3 bdrm twnhm - PH**	\$1,160	\$2,062	\$1,840	\$2,163	\$2,022	\$1,063	\$1,210
4 bdrm twnhm - PH**	\$1,225	\$2,471	\$3,097	\$1,610	\$2,393	\$1,221	\$1,275
5 bdrm twnhm - PH**	\$1,374	\$2,475	\$1,697	\$1,658	\$1,943	\$1,412	\$1,424
Renaissance PI @ Grand II							
1 bdrm garden*	\$708	\$1,006	\$1,147	\$1,027	\$1,060	\$667	\$708
2 bdrm garden*	\$830	\$1,042	\$1,225	\$923	\$1,063	\$834	\$830
2 bdrm twnhm*	\$830	\$1,470	\$1,449	\$1,382	\$1,434	\$807	\$830
3 bdrm twnhm*	\$959	\$2,062	\$1,840	\$2,163	\$2,022	\$1,063	\$959
4 bdrm twnhm - PH**	\$1,175	\$2,471	\$3,097	\$1,610	\$2,393	\$1,221	\$1,225
5 bdrm twnhm - PH**	\$1,374	\$2,475	\$1,697	\$1,658	\$1,943	\$1,412	\$1,424
Renaissance PI @ Grand III							
1 bdrm garden*	\$658	\$1,006	\$1,147	\$1,027	\$1,060	\$667	\$658
2 bdrm garden*	\$772	\$1,042	\$1,225	\$923	\$1,063	\$834	\$772
2 bdrm twnhm*	\$823	\$1,470	\$1,449	\$1,382	\$1,434	\$807	\$823
3 bdrm twnhm*	\$948	\$2,062	\$1,840	\$2,163	\$2,022	\$1,063	\$948
4 bdrm twnhm - PH**	\$1,260	\$2,471	\$3,097	\$1,610	\$2,393	\$1,221	\$1,310
5 bdrm twnhm - PH**	\$1,374	\$2,475	\$1,697	\$1,658	\$1,943	\$1,412	\$1,424
Gardens @ Renaissance							
1 bdrm garden*	\$744	\$1,035	\$1,073	\$1,048	\$1,052	\$778	\$744
2 bdrm garden - PH**	\$932	\$1,023	\$1,361	\$1,410	\$1,265	\$967	\$982
Senior Living @ Renaissance							
1 bdrm garden*	\$746	\$1,136	\$1,176	\$1,119	\$1,144	\$778	\$746
2 bdrm garden - PH**	\$972	\$1,023	\$1,391	\$1,391	\$1,268	\$967	\$1,022
King Louis Square							
1 bdrm garden*	\$531	\$1,245	\$931	\$960	\$1,045	\$667	\$531
2 bdrm grdn/twnhm*	\$663	\$1,649	\$1,604	\$1,533	\$1,595	\$807	\$663
3 bdrm grdn/twnhm*	\$777	\$1,555	\$1,287	\$1,728	\$1,523	\$1,063	\$777
4 bdrm twnhm - PH**	\$1,158	\$1,720	\$2,430	\$3,000	\$2,383	\$1,221	\$1,208
King Louis Square II (Old Frenchtown)							
1 bdrm garden*	\$572	\$1,170	\$1,165	\$1,095	\$1,143	\$675	\$572
2 bdrm garden*	\$704	\$1,489	\$1,348	\$1,160	\$1,332	\$841	\$704
3 bdrm twnhm*	\$830	\$1,975	\$1,858	\$2,024	\$1,952	\$1,071	\$830
LesChateaux							
1 bdrm	\$804	\$1,335	\$1,328	\$1,223	\$1,295	\$778	\$804
2 bdrm	\$964	\$1,369	\$1,243	\$1,396	\$1,336	\$967	\$964
Cahill House							
1 bdrm garden*	\$732	\$850	\$789	\$775	\$805	\$778	\$732
2 bdrm garden - PH**	\$867	\$808	\$1,355	\$1,576	\$1,246	\$967	\$967
Cambridge Heights I							
1 bdrm garden*	\$583	\$628	\$710	\$551	\$630	\$675	\$583
2 bdrm garden*	\$715	\$1,137	\$835	\$722	\$898	\$841	\$715
2 bdrm twnhm*	\$772	\$1,270	\$915	\$960	\$1,048	\$816	\$772
3 bdrm twnhm*	\$910	\$956	\$981	\$1,380	\$1,106	\$1,071	\$910
4 bdrm twnhm - PH**	\$1,274	\$3,139	\$1,648	\$1,285	\$2,024	\$1,227	\$1,324
5 bdrm twnhm - PH**	\$1,290	\$1,696	\$1,735	\$1,530	\$1,654	\$1,414	\$1,414
Cambridge Heights II							
1 bdrm garden*	\$606	\$628	\$710	\$551	\$630	\$675	\$606
2 bdrm garden*	\$786	\$1,137	\$835	\$722	\$898	\$841	\$786
2 bdrm twnhm*	\$812	\$1,270	\$915	\$960	\$1,048	\$816	\$812
3 bdrm twnhm*	\$910	\$956	\$981	\$1,380	\$1,106	\$1,071	\$910
4 bdrm twnhm - PH**	\$1,274	\$3,139	\$1,648	\$1,285	\$2,024	\$1,227	\$1,324
5 bdrm twnhm - PH**	\$1,290	\$1,696	\$1,735	\$1,530	\$1,654	\$1,414	\$1,414
Cambridge Senior							
1 bdrm garden*	\$667	\$582	\$681	\$885	\$716	\$778	\$667
2 bdrm garden	\$867	\$920	\$918	\$1,009	\$949	\$967	\$917

Development	Current Flat Rent	Comp. Rent	Comp. Rent	Comp. Rent	Average Comp. Rent	80% FMR	
						80% minus UA	Increase No Increase Decrease
							2024 Proposed Flat Rent
Arlington Grove							
2 brdm twnhm*	\$749	\$1,185	\$978	\$1,115	\$1,093	\$803	\$749
3 brdm twnhm*	\$856	\$1,523	\$1,378	\$1,391	\$1,431	\$1,058	\$856
North Sarah							
1 brdm garden*	\$640	\$1,016	\$1,068	\$872	\$985	\$664	\$640
2 brdm twnhm*	\$749	\$1,150	\$1,150	\$1,150	\$1,150	\$803	\$749
3 brdm twnhm*	\$855	\$1,238	\$2,775	\$1,530	\$1,848	\$1,058	\$855
North Sarah II							
1 brdm garden*	\$600	\$1,016	\$1,068	\$872	\$985	\$664	\$600
2 brdm twnhm*	\$700	\$1,150	\$1,150	\$1,150	\$1,150	\$803	\$700
3 brdm twnhm*	\$800	\$1,238	\$2,775	\$1,530	\$1,848	\$1,058	\$800
North Sarah III							
1 brdm garden*	\$600	\$1,016	\$1,068	\$872	\$985	\$664	\$600
2 brdm twnhm*	\$700	\$1,150	\$1,150	\$1,150	\$1,150	\$803	\$700
3 brdm twnhm*	\$800	\$1,238	\$2,775	\$1,530	\$1,848	\$1,058	\$800
Preservation Square I							
2 brdm garden*	\$808	\$1,597	\$1,913	\$1,097	\$1,536	\$816	\$808
2 brdm twnhm*	\$1,005	\$1,253	\$1,329	\$1,479	\$1,354	\$841	\$1,005
3 brdm garden*	\$1,019	\$1,771	\$1,720	\$1,400	\$1,630	\$1,102	\$1,019
* Tax Credit Max							
** PH Unit, not Tax Credit							

RESOLUTION No. 3012

MEMORANDUM

To: Board of Commissioners

Through: Latasha Barnes, Acting Executive Director

From: Jason W. Hensley, Director of Real Estate Development

Date: June 12, 2024

Subject: Resolution No. 3012
Authorizing and Approving the St. Louis Housing Authority to Submit a Section 18 Disposition Application for Hodiament Apartments

The St. Louis Housing Authority is seeking Board approval to submit a Section 18 disposition application to remove 22 public housing units from its ACC contract with HUD. The proposed action has been part of the Agency Plan since 2022 and has been included in each subsequent Plan.

Hodiament Apartments was vacated in 2022 due to persistent and significant safety issues at the apartment complex. When SLHA assumed management of Northside Scattered Sites in October 2021, the apartment complex already had high vacancy, several units with illegal occupants, and significant deferred maintenance needs as a result of prior management. In November 2021, several vacant units were vandalized in the 2505 Hodiament building, which suffered major water damage, further rendering them unable to be occupied. Due to the deteriorating safety conditions in the apartment complex and surrounding neighborhoods, SLHA's Operations Department made the decision to relocate residents in accordance with the approved ACOP at the time and placed the households in other public housing units within the portfolio.

Since that time, all 22 units at Hodiament Apartments have been repeatedly vandalized and need major repairs to bring them back online. Vandalism, water damage, mold and continued issues with squatters have resulted in all units being unable to be occupied. The physical needs assessment completed on the property by Bureau Veritas showed a rehab cost of over \$5.7 million, or a cost of approximately \$260,000 per unit.

SLHA plans to market the property through a Request for Proposals (RFP) in conjunction with the St. Louis Development Corporation to seek a community-minded developer who can return the property to productive use as affordable housing. In addition, the RFP will also include the adjacent property that is owned by the City's Land Reutilization Authority for potential development along with any rehab of Hodiament Apartments.

**Authorizing and Approving the St. Louis Housing Authority to Submit a Section 18 Disposition Application
for Hodiament Apartments (MO001000041)**

WHEREAS, the St. Louis Housing Authority (SLHA) desires to dispose of twenty-two (22) public housing units at Hodiament Apartments; and

WHEREAS, SLHA will seek a community-centered development partner to purchase the property and return it to use as affordable housing; and

WHEREAS, SLHA intends to partner with the City of St. Louis Development Corporation to market the property through a Request for Proposals and package the SLHA property with the adjacent vacant land owned by the City's Land Reutilization Authority; and

WHEREAS, the property was made vacant in 2022 due to safety issues at the development; and

WHEREAS, residents occupying units at Hodiament Apartments were relocated to other public housing units within the SLHA portfolio in accordance with the approved SLHA Admissions and Continued Occupancy Policy; and

WHEREAS, the City-Wide Tenant Affairs Board (TAB) was notified and consulted on January 24, 2024 and gave SLHA a letter of support for the disposition of the property; and

WHEREAS, the TAB provided a letter waiving the offer of sale of Hodiament Apartments to the TAB on February 21, 2024; and

WHEREAS, local government notification and consultation regarding the submission of the Disposition Application has occurred and a letter of support was received on May 31, 2024; and

WHEREAS, SLHA will prepare and submit the Disposition Application to HUD; and

WHEREAS, SLHA has complied with the current rules and regulations under 24 CFR 970.6 for submission of a demolition/disposition application;

WHEREAS, the disposition of the Hodiament public housing units is in agreement with SLHA's most recent and current Agency Plan.

NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF COMMISSIONERS OF THE ST. LOUIS HOUSING AUTHORITY THAT:

1. The St. Louis Housing Authority is authorized to submit a Section 18 disposition application to HUD to dispose of 22 public housing units at Hodiament Apartments, a mixed-population development consisting of three (3) structures located at 1949 Hodiament, 2501 Hodiament and 2601 Hodiament.
2. The Acting Executive Director is hereby authorized to take any and all necessary actions, and to execute all documents to carry out the terms and conditions of this resolution.

EXECUTIVE DIRECTOR REPORT



MEMORANDUM

To: Board of Commissioners

From: Latasha Barnes, Acting Executive Director

Date: June 21, 2024

Subject: Executive Director Report

I am pleased to present the report below for your consideration. The Monthly Activity Report, also presented for your review, provides additional information related to SLHA activities.

2024 Agency Plan

After multiple solicitations for public feedback, the draft FY 2024 Agency Plan is being finalized and prepared for HUD submission. To ensure we captured a wide range of perspectives, the plan was publicized through multiple channels for public input. This included hosting a virtual town hall meeting, convening with the City-Wide Tenant Affairs Board, sharing the draft plan with City officials for their review, and announcing it through various media outlets. The plan was also easily accessible on our website and notice of the same was posted at all public housing sites for residents to review. The 45-day comment period concluded with an in-person Public Hearing at SLHA at 3 p.m. on June 17, 2024. We appreciate the feedback received from our stakeholders and look forward to sharing a copy of the final product in the near future.

Clinton-Peabody

SLHA is making significant progress on the Clinton-Peabody redevelopment in collaboration with POAH. The development team recently discussed the Choice Neighborhoods application process and outlined the upcoming planning work needed for submission. Residents were presented with the Choice Neighborhoods planning map encompassing the area between Jefferson Avenue, Interstate 64, the Mississippi River and Interstate 44, and given an opportunity to identify the services and amenities they envisioned for their new community. To further engage the community, a series of charettes involving Choice Neighborhood stakeholders were held and the team met with CDA to map out the contracting and disbursement process for ARPA funds awarded for planning and demolition, expected to be available before year-end.

Revitalizing the Al Chappelle Center as a Community Hub: SLHA has undertaken a focused effort to revitalize the Al Chappelle Center as a vibrant community hub and re-activate vacant spaces within the facility. SLHA collected resident feedback regarding desires and expectations for the space. Additionally, meetings were held with key community stakeholders to collaboratively explore resource gaps and identify services most valuable to the residents. Efforts are currently underway to

extend designated spaces within the Al Chappelle Center to vital service providers. This initiative aims to bridge the gap between residents and resources by bringing much-needed community support services directly to their doorstep, fostering a more empowered and connected community.

Housing Choice Voucher Program

SEMAP Performance: SLHA's Housing Choice Voucher (HCV) program has implemented practices to meet the criteria for SEMAP Indicator 13 - Utilization and the efforts have increased the score. Per recent records, the HCV utilization rate has risen by 10% in the last six months. The rampant utilization increases, while positive, have had a slight impact on inspection scheduling resulting in a 7% decrease in completed inspections across the department. The team is actively working to expand capacity in this area.

Request for PBV Proposals: SLHA is pleased to announce the upcoming issuance of a Request for Proposals (RFP) for Project-Based Vouchers (PBV). This initiative has several benefits. It allows the agency to ensure market changes and updated housing standards are incorporated into the contracts, which produce improved property conditions, accessibility features, and energy efficiency. Secondly, the RFP process promotes innovation among housing partners, which may result in new landlords offering properties in better locations or with more amenities, existing partners improving offerings to remain competitive, and/or the creation of new mixed-income housing to better serve the community's needs. Finally, the RFP allows for a strategic expansion of housing options in target areas and reopens negotiations with existing partners. Overall, the issuance of the PBV RFP represents a positive step towards offering a wider range of high-quality and sustainable affordable housing options to our voucher participants.

While several current PBV contracts are naturally expiring after 10–15-year terms, SLHA is committed to ensuring minimal housing disruptions for current PBV households. Staff have been working closely with families to issue vouchers and allow households to identify suitable housing of their choice.

Relaunch of Homeownership Program: SLHA is thrilled to announce the relaunch of the Bridge to Homeownership program. The Bridge to Homeownership program allows families that are assisted under the HCV program to use their voucher/subsidy to buy a home and receive monthly mortgage payment assistance. The Bridge to Homeownership program is currently operating at a 21% participation rate. With the relaunch, we are bringing in new partners and collaborative services to increase participation to 100 participants. If SLHA's "Step up to Homeownership" grant with Better Family Life is awarded, up to thirty (30) Section 8 families will receive targeted credit repair and financial planning services as a part of their homeownership journey.

Public Housing

Occupancy Campaign: SLHA remains focused on increasing occupancy across its public housing portfolio. The Occupancy Campaign, led by the Property Management Department, aims to expand housing opportunities by expediting the unit turn process over the next 90 days. This initiative involves intra-departmental collaborations across sites, inter-departmental collaboration within the agency, and contracting with third-party contractors.

As part of the vacancy reduction efforts, SLHA has implemented various strategies that have demonstrably improved occupancy rates at eight (8) public housing sites. For developments requiring additional support, targeted make-ready projects are underway:

- **SSSS – Tiffany Make-Ready (5 units):** Raineri Construction will be awarded a 60-day contract purchase to begin construction.
- **SSSS Lafayette Townhomes/Folsom/Norfolk Make Ready (6 units):** A Request for Quotation (RFQ) was released on May 28, 2024.
- **SSSS Lafayette Townhomes Make-Ready (4 units):** Also released on May 28, 2024, initial quotes for this RFQ are expected by the end of June.
- **Parkview Apartments (24 units):** A contractor was hired to expedite the turn-around of 24 vacant units for occupancy.
- **NSSS:** The \$2 million funding award from the City of St. Louis will be prioritized for unit turns across Northside Scattered Sites due to the nature and scope of maintenance needs.
- **Cochran:** Any remaining funds from the \$2 million allocation will be used towards unit turns in Cochran Plaza.

The recent portfolio-wide occupancy push and Clinton-Peabody unit inspections have resulted in a 66% increase in work orders from April to May 2024 and a 14.4% decrease in completion rates. The agency will extend overtime opportunities and employ third-party vendors when feasible to address maintenance needs and ensure resident concerns are addressed appropriately.

Community Collaborations and Engagement

Award Winning Senior Services: In recognition of his exceptional service to SLHA residents, the Elderly and Disabled Services Coordinator was recently honored by the St. Louis Senior Fund. He received the prestigious Profession in Aging Award at their Partner Recognition and Awards Reception held on May 22, 2024. This recognition underscores SLHA's commitment to providing exceptional care and support to our senior residents.

LaSalle Park Youth Violence Prevention: SLHA's funding request to the St. Louis Area Violence Prevention Commission (VPC) for the LaSalle Park Youth Festival has been approved. This initiative, developed in partnership with LaSalle Park residents, aims to provide a safe and engaging event for young people aged 15-25, thereby reducing at-risk behaviors. The LaSalle Park Youth Festival will be held on July 27, 2024 in conjunction with the Office of Violence Prevention's Show Me Peace Walk at Lifewise STL. The event will feature a one-day extravaganza with local youth-serving organizations showcasing their resources; engaging entertainment to cater to all ages; food; and water activities to cater to a variety of interests, ensuring there is something for everyone.

Expanding ROSS Referrals: SLHA recently leveraged resident feedback to enhance resident access to vital support services. Through surveys, the team gathered valuable insights into the needs and challenges faced by our community. This data proved instrumental in expanding ROSS referrals to a wider network of community partners. By pinpointing specific service gaps identified in the surveys, the agency identified organizations that could effectively address those needs. This broadened approach to ROSS referrals ensures residents are connected with the most relevant and impactful resources available, empowering them to thrive within our community.

Activating Resident Voices: Recognizing the importance of resident voices, SLHA is actively expanding Tenant Affairs Boards (TABs) across our public housing portfolio. This initiative aims to empower residents and provide them with a direct platform to shape their communities and advocate for their needs. To achieve this, we're implementing a two-pronged approach. First, we have been focused on establishing new TABs in developments lacking them. Since

January 2024, five (5) TABs have been reactivated. TAB activation ensures residents have a designated channel for voicing concerns and suggestions. Second, we're placing a strong emphasis on resident engagement in the TAB election process. Through informative campaigns and accessible voting procedures, we're encouraging residents to actively participate in choosing their TAB representatives. This increased engagement will foster a stronger sense of ownership and empower residents to be active participants in shaping the future of their communities.

Summer Meals and Senior Nutrition Program: Summer meal planning is in full swing at several SLHA public housing sites. Saving Our Children will sponsor the Youth Summer Food program at LaSalle Park and Kingsbury, offering nutritious meals to children 18 and under (or 19 and over in some cases). All property/assistant managers and resident volunteers will attend a mandatory training program to ensure a smooth operation. Meals must be consumed on-site according to State guidelines. In addition to the summer program, the Elderly and Disabled Services Coordinator is partnering with the St. Louis Area Food Bank to bring back the senior food commodity boxes at various SLHA locations. These boxes, which became inactive during COVID, will be recertified to serve residents aged 60 and over. This initiative ensures access to essential food resources for our senior residents.